

**MALAYSIAN SUSTAINABLE PALM OIL  
MSPO OPMC Public Summary Report**

- Initial Assessment
- Annual Surveillance Assessment (4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>IOI CORPORATION BERHAD</b>
Client Company (HQ) Address: IOI Plantation Services Sdn Bhd Level 29, IOI City Tower 2, Lebuhr IRC, IOI Resort City 62502 Putrajaya, Malaysia
Certification Unit: Pamol Kluang Palm Oil Mill & Estates (Pamol Timur Estate, Pamol Barat Estate, Mamor Estate, Unijaya Estate, Kahang Estate, and Swee Lam Estate)
Date of Final Report: 14/3/2023

**Report prepared by:**

Muhammad Fadzli Masran (Lead Auditor)

**Report Number: 3511556**

**Assessment Conducted by:**

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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
<b>Company Name</b>	IOI Corporation Berhad - IOI Plantation Services Sdn Bhd		
<b>Mill/Estate</b>	<b>Certification Unit</b>	<b>MPOB License No.</b>	<b>Expiry Date</b>
	Pamol Kluang Palm Oil Mill	500040104000	31/03/2023
	Pamol Timur Estate	504178602000	31/05/2023
	Pamol Barat Estate	504177802000	30/06/2023
	Mamor Estate	511691002000	31/03/2023
	Unijaya Estate	504524202000	31/07/2023
	Kahang Estate	502165302000	31/01/2023
	Swee Lam Estate	617329002000	30/04/2023
<b>Address</b>	IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia		
<b>Management Representative</b>	Mr Rajan a/l Sinnathamby		
<b>Website</b>	www.ioigroup.com	<b>E-mail</b>	pmm@ioigroup.com
<b>Telephone</b>	+603-89478888 +607-787 5100	<b>Facsimile</b>	+607-7875179

1.2 Certification Information			
<b>Certificate Number</b>	Mill: MSPO 700801 Estate: MSPO 700802	<b>Certificate Start Date</b>	31/12/2018
<b>Date of First Certification</b>	31/12/2018	<b>Certificate Expiry Date</b>	30/12/2023
<b>Scope of Certification</b>	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
<b>Visit Objectives</b>	<p>The objective of the assessment was to conduct a surveillance assessment 4 and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organization's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.</p>		
<b>Standard</b>	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
<b>Stage 1 Date</b>	Not applicable		

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### Revision 2 (Nov 2021)

<b>Stage 2 / Initial Assessment Visit Date (IAV)</b>	26-29/11/2018
<b>Continuous Assessment Visit Date (CAV) 1</b>	25-28/11/2019
<b>Continuous Assessment Visit Date (CAV) 2</b>	24-27/11/2020
<b>Continuous Assessment Visit Date (CAV) 3</b>	23-27/11/2021
<b>Continuous Assessment Visit Date (CAV) 4</b>	21-25/11/2022

### 1.3 Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 547027	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn. Bhd.	15/03/2025
MSPO 720913	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018.	BSI Services Malaysia Sdn. Bhd.	22/12/2024

### 1.4 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Pamol Kluang Palm Oil Mill	8 1/2 Miles, Jalan Mersing Road, 86007 Kluang, Johor, Malaysia	2° 06' 39.89" N	103° 23' 30.52" E
Pamol Timur Estate	Jalan Kluang-Mersing, 86000 Kluang, Johor, Malaysia	2° 06' 39.48" N	103° 23' 32.25" E
Pamol Barat Estate	Jalan Kluang-Paloh, 86000 Kluang, Johor, Malaysia	2° 06' 46.90" N	103° 20' 37.99" E
Mamor Estate	Jalan Kluang-Paloh, 86000 Kluang, Johor, Malaysia	2° 08' 43.14" N	103° 18' 21.49" E
Unijaya Estate	Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511, 86009 Kluang, Johor, Malaysia	1° 56' 26.04" N	103° 16' 41.47" E
Kahang Estate	Peti Surat 14, 86700 Kahang, Johor, Malaysia	2° 19' 55.72" N	103° 29' 51.83" E
Swee Lam Estate	K.B. 107, 81000 Kulai, Johor, Malaysia	1° 40' 28.95" N	103° 39' 13.56" E

### 1.5 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
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Pamol Timur Estate	2,098.00	6.78	191.33	2,296.11	91.37
Pamol Barat Estate	2,124.00	7.23	179.09	2,310.32	91.94
Mamor Estate	2,073.00	48.36	***104.11	2,225.47	93.15
Unijaya Estate	*1,160.00	**1.47	*99.17	1,260.64	92.02
Kahang Estate	2,278.00	4.11	137.79	2,419.90	94.14
Swee Lam Estate	1,098.00	2.16	60.8	1,160.96	94.58
<b>Total</b>	<b>10,831.00</b>	<b>70.11</b>	<b>772.29</b>	<b>11,673.40</b>	

Note:

Unijaya Estate

\*Total planted reduced 6ha due to:

- Increase of 3.00 ha due to remapping river and riparian reserve in PM07A, PM08A and PM16A
- Decreased of 2.00 ha due to declare new river and riparian reserve in PM10A
- Decreased of 9.00 ha due to replanting and 2019 and 2022

\*\*Decrease 0.50ha river due to the re-demarcation by GIS

Mamor Estate

\*\*\*Total area variance 4.53 ha due to new land title area declare by admin and GIS department starting in year 2022

**1.6 Plantings & Cycle**

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pamol Timur Estate	12.00	1,118.00	664.00	304.00	0.00	2,086.00	12.00
Pamol Barat Estate	193.00	1,727.00	204.00	0.00	0.00	1,931.00	193.00
Mamor Estate	183.00	0.00	1,148.00	742.00	0.00	1,890.00	183.00
Unijaya Estate	243.00	306.00	547.00	64.00	0.00	917.00	243.00
Kahang Estate	0.00	0.00	2,047.00	231.00	0.00	2,278.00	0.00
Swee Lam Estate	0.00	308.00	429.00	192.00	169.00	1,098.00	0.00
<b>Total (ha)</b>	<b>631.00</b>	<b>3,459.00</b>	<b>5,039.00</b>	<b>1,533.00</b>	<b>169.00</b>	<b>10,200.00</b>	<b>631.00</b>

**1.7 Certified Tonnage of FFB**

Estate	Tonnage / year		
	Estimated (Dec 21 - Nov 22)	Actual (Nov 21 - Oct 22)	Forecast (Dec 22 - Nov 23)
Pamol Timur Estate	48,031.00	38,157.55	49,057.00
Pamol Barat Estate	30,288.00	34,847.73	46,185.00
Mamor Estate	49,919.00	47,849.83	44,373.00
Unijaya Estate	23,740.00	18,167.19	23,830.00

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Kahang Estate	66,440.00	49,944.30	64,980.00
Swee Lam Estate	29,571.00	19,001.78	27,050.00
<b>Total</b>	<b>247,989.00</b>	<b>207,968.38</b>	<b>255,475.00</b>

**1.8 Uncertified Tonnage of FFB**

Estate	Tonnage / year		
	Estimated (Dec 21 - Nov 22)	Actual (Nov 21 - Oct 22)	Forecast (Dec 22 - Nov 23)
N/A	N/A	N/A	N/A
<b>Total (mt)</b>	N/A	N/A	N/A

**1.9 Certified Tonnage**

	Estimated (Dec 21 - Nov 22)	Actual (Nov 21 - Oct 22)	Forecast (Dec 22 - Nov 23)
	<b>Mill Capacity: 60 MT/hr</b>	<b>FFB</b>	<b>FFB</b>
	247,989.00	207,968.38	255,475.00
<b>SCC Model: SG</b>	<b>CPO (OER: 21.75 %)</b>	<b>CPO (OER: 22.58 %)</b>	<b>CPO (OER: 22.80 %)</b>
	53,937.61	46,963.36	5,8247.11
	<b>PK (KER: 5.50 %)</b>	<b>PK (KER: 4.72 %)</b>	<b>PK (KER: 4.97 %)</b>
	13,639.40	9,815.63	12,696.00

**1.10 Actual Sold Volume (CPO)**

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
46,963.36	N/A	N/A	46,963.36	N/A	46,963.36

**1.11 Actual Sold Volume (PK)**

PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
9,815.63	N/A	N/A	9,815.63	N/A	9,815.63

## Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 21 - 25/11/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the Pamol Kluang Palm Oil Mill, and Supply Bases (Pamol Timur Estate, Pamol Barat Estate, Mamor Estate, Unijaya Estate, Kahang Estate and Swee Lam Estate) 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.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-2:2013 or MS 2530-3:2013 or 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 Certification Unit were not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

The estates or smallholders 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

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 private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.6.

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.

All the previous nonconformities are remains closed. The assessment findings from the initial assessment are detailed in Section 4.2. Major non-conformity has been closed offsite due to evidences submission were sufficient.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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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)
Pamol Kluang Palm Oil Mill	√	√	√	√	√
Pamol Timur Estate	√		√	√	
Pamol Barat Estate	√		√	√	
Mamor Estate		√			√
Unijaya Estate	√		√	√	√
Kahang Estate		√			
Swee Lam Estate		√			√

**Tentative Date of Next Visit: November 6, 2023 - November 10, 2023**

**Total No. of Mandays: 15 Mandays**

**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>
Muhammad Fadzli Masran (MFM)	Team Leader	<p><b>Education:</b> He holds Degree in Forestry Science, graduated from University Putra Malaysia.</p> <p><b>Work Experience:</b> He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health &amp; safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April</p>



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		<p>2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021.</p> <p><b>Aspect covered in this audit:</b>  Mill best practices, estate best practices, land and legal issues, environment and ecological, waste management, HCV, OHS, waste management, environment aspect impact, and environment aspect impact etc. (Principle 1, Principle 3, Principle 4, Principle 5 and Principle 7).</p> <p><b>Language proficiency:</b>  Able to speak and understand Bahasa Malaysia and English.</p>
Mohd Nur Amin bin Mohd Halim (MNA)	Team Member	<p><b>Education:</b>  Diploma Office Management &amp; Technology, UiTM.</p> <p><b>Work Experience:</b>  He gained his career as sustainability practitioner in Government Link Company related to palm oil plantation for over 6 years and 10 months majorly handling operational excellent, environment, safety, and health at the upstream and downstream operations. He then joining an international certification body over the last 3 years and started his auditing career as qualified lead auditor for MSPO (OPMC and SCCS) scheme; and qualified auditor for ISCC Waste and Residue scheme. Concurrent, he was also a document controller and scheme coordinator for MSPO (OPMC and SCCS) prior to DSM accreditation.</p> <p><b>Training attended:</b>  He has completed Exemplar IMS (9001, 14001 &amp; 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV &amp; HCS Course (2020), Endorse ISCC Basic &amp; PLUS Course (2022), CQI &amp; IRCA ISO 14001:2015 LA Course (2022), Endorse RSPO P&amp;C LA Course (2022).</p> <p><b>Aspect covered in this audit:</b>  Workers welfare, stakeholder consultation, social, long-term economic viability etc. (Principle 2, Principle 3, Principle 4, Principle 6, and Principle 7).</p> <p><b>Language proficiency:</b>  Able to speak and understand Bahasa Malaysia and English.</p>
Yusof Khairan Nizar Ahmad Tarmizi (YKN)	Team Member	<p><b>Education:</b>  Holds a Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.</p> <p><b>Work Experience:</b>  Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS 1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles &amp;</p>

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		<p>Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.</p> <p><b>Training attended:</b></p> <p>He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&amp;SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&amp;C 2018 Lead Auditor Course; SMETA Requirements Training; HCV &amp; HCS Introductory Training. Also attended the Quality &amp; Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodies Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).</p> <p><b>Aspect covered in this audit:</b></p> <p>Mill best practices, Estate best practices, land and Legal issues, OHS, contracts etc. long-term economic viability etc.</p> <p><b>Language proficiency:</b></p> <p>Fluent in English and Bahasa Malaysia.</p>
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## 2.2 Impartiality and conflict of interest

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

## 2.3 Accompanying Persons

No.	Name	Role
1.	Hafriazhar Mohd. Mokhtar	Observer (QR for Muhammad Fadzli)

## 2.4 Assessment Plan

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

Date	Time	Subjects	MFM	YKN	MNA
Sunday 20/11/2022	PM	Audit Team Travelling	√	√	√
Monday 21/11/2022 Pamol Kluang Palm Oil Mill	08.30 - 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader</li> <li>• Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	√

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Date	Time	Subjects	MFM	YKN	MNA
	09.00 - 13.00	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	09.00 - 12.00	Stakeholder interviews			√
	13.00 - 14.00	Lunch/Rest	√	√	√
	14.00 - 16.30	Continue with document review (MSPO 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 P6: Best practices	√	√	√
	16.30 - 17.00	Interim Closing briefing	√	√	√
Tuesday 22/11/2022 Kahang Estate	09.00 - 13.00	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	09.00 - 12.00	Stakeholder interviews			√
	13.00 - 14.00	Lunch/Rest	√	√	√
	14.00 - 16.30	Continue with document review Document review P1 – P7 (MSPO 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 and P6: Best practices P7: Development of New Planting (if any)	√	√	√

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Date	Time	Subjects	MFM	YKN	MNA
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Wednesday 23/11/2022 Kahang Estate	09.00 - 13.00	Continue with document review Document review P1 – P7 (MSPO 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 and P6: Best practices, P7: Development of New Planting (if any)	√		
Mamor Estate	13.00 - 14.00	Lunch and travel to Mamor Estate	√		
	09.00 - 13.00	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.		√	√
	09.00 - 12.00	Stakeholder interviews			√
	13.00 - 14.00	Lunch/Rest		√	√
	14.00 - 16.30	Continue with document review Document review P1 – P7 (MSPO 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 and P6: Best practices, P7: Development of New Planting (if any)	√	√	√
	16.30 - 17.00	Interim Closing briefing	√	√	√
Thursday 24/11/2022	09.00 - 13.00	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area	√		

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Mamor Estate  Swee Estate Lam		(agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.			
	13.00 - 14.00	Lunch and travel to Swee Lam Estate	√		
	09.00 - 13.00	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.		√	√
	09.00 - 12.00	Stakeholder interviews			√
	13.00 - 14.00	Lunch/Rest		√	√
	14.00 - 16.30	Continue with document review Document review P1 – P7 (MSPO 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 and P6: Best practices, P7: Development of New Planting (if any)	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Friday 25/11/2022	09.00 - 13.00	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.		√	√
	09.00 - 12.00	Stakeholder interviews			√
	13.00 - 14.00	Lunch/Rest		√	√
	14.00 - 16.00	Continue with document review Document review P1 – P7 (MSPO part 3) P1: Management commitment and responsibility P2: Transparency	√	√	√

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Date	Time	Subjects	MFM	YKN	MNA
		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, P7: Development of New Planting (if any)			
	16.00 - 16.30	Preparation of audit report	√	√	√
	16.30 - 17.00	Closing Meeting	√	√	√

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

During the assessment there were three (3) Major & one (1) Minor nonconformities and four (4) OFI raised. The Pamol Kluang Palm Oil Mill, and Supply Bases (Pamol Timur Estate, Pamol Barat Estate, Mamor Estate, Unijaya Estate, Kahang Estate and Swee Lam Estate) Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-Conformity Report			
<b>NCR Ref #:</b>	2279315-202211-M1	<b>Issue Date:</b>	25/11/2022
<b>Due Date:</b>	23/02/2023	<b>Date of Closure:</b>	20/02/2023
<b>Area/Process:</b>	Kahang Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.3.1.1 Major
<b>Requirements:</b>	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.		
<b>Statement of Nonconformity:</b>	The operation of 3 units of genset found non-compliance to applicable subsidiary legal requirements under Environmental Quality Act 1974.		
<b>Objective Evidence:</b>	<u>Kahang Estate</u> 3 unit of gensets in Genset Room found not having Written Approval or notified to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014.		
<b>Corrections:</b>	Estate management has liaised with Mr. Alvin Wong from Envitech Water Sdn Bhd (a consultant who has experience in getting approval for genset) to assist on the DOE written approval/ notification for Kahang Estate. The additional documentation required by DOE as stated in the FORM AS/PUB/N-JANA will be prepared and submitted by the consultant.		

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<b>Root cause analysis:</b>	The gensets is used to supply the electricity and water (from water pump) for the whole complex of the estate. Since the genset was bought in the 90s, the current management could not find any approval or details of the genset.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>• Kahang Estate will follow up with the consultant and DOE once the AS/PUB/N-JANA forms are submitted to DOE together with related documents as required by DOE until the estate obtains the Written Approval.</li> <li>• Once the written approval is obtained it will be displayed in the office and genset room and filed in the Evaluation of Licenses and Permits file.</li> <li>• This approval shall also be included in the estate’s list of Evaluation of License and Permits.</li> <li>• Management shall also check on this approval when they carry out monthly checks on their list of Evaluation of Licenses and Permits.</li> <li>• Management shall verify the status of this approval when they carry out monthly checks on their list of Evaluation of Licenses and Permits.</li> <li>• Safety, Health and Environment Department shall also verify this matter, along with the other approval, licenses and permits during internal and verification audit.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Verified the evidence for the Major NC Close out as follows:</p> <p>Kahang Estate has appointed ETOSH Consult &amp; Engineering Plt. for consultancy and services – Fuel Burning Equipment (FBE) Notification to DOE as per quotation no. KHE/GENSET REG/01/2023 dated 13/01/2023.</p> <p>The estate has accepted the quotation and notify the Plantation Controller on the process as per Memorandum dated 25/01/2023.</p> <p>The consultant, ETOSH Consult &amp; Engineering Plt. Has established timeframe and the process flow. The monitoring of the progress will be conducted bas on timeframe established.</p> <p>The estate has included the progress of Generator Set Notification in the Evaluation of License and Permit.</p> <p>The evidence found adequate to close the Major NC. Thus, the Major NC is effectively closed on 20/02/2023. Further verification will be conducted in the next surveillance audit.</p>

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2279315-202211-M2	<b>Issue Date:</b>	25/11/2022
<b>Due Date:</b>	23/02/2023	<b>Date of Closure:</b>	20/02/2023
<b>Area/Process:</b>	Pamol Kluang Palm Oil Mill	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.3.1.1 Major
<b>Requirements:</b>	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.		
<b>Statement of Nonconformity:</b>	The operation of POM found non-compliance to applicable subsidiary legal requirements under Environmental Quality Act 1974.		
<b>Objective Evidence:</b>	<u>Pamol Kluang POM</u> One unit of Fume Hood in Laboratory found not having Written Approval or Notified to DOE under Regulation 5 of CAR 2014 as required.		



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<b>Corrections:</b>	Until the time when the written approval has been received, the Mill management will stop using the fume hood with immediate effect and will be using NIR machine to monitor losses in mill.
<b>Root cause analysis:</b>	Since the fume hood was installed more than ten years ago, the current management could not find any approval or details of the fume hood.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>• Mill management has engaged a consultant (Dynakey) to obtain approval from DOE by filling up the AS/PUB/N-JANA forms before installing a new fume hood at the lab.</li> <li>• Mill management will follow up with the consultant and DOE until the Written Approval has been received.</li> <li>• Once the written approval is obtained it will be displayed in the office and lab and filed in the Evaluation of Licenses and Permits file.</li> <li>• This approval shall also be included in the mill's list of Evaluation of License and Permits.</li> <li>• Management shall also verify the status on this approval when they carry out monthly checks on their list of Evaluation of Licenses and Permits.</li> <li>• Safety, Health and Environment Department shall also conduct the verification on this matter along with the other approval, licenses and permits during internal and verification audit.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Verified the evidence for the Major NC Close out as follows:</p> <p>The mill has issued an internal memo on Cessation Of Fume hood Use to the Asst. Manager and Laboratory In-Charge dated 22/11/2022.</p> <p>The mill has sealed the fume hood and dismantle the blower.</p> <p>The mill has appointed Dynakey Laboratories Sdn. Bhd. for fixing new set of Laboratory Hot Room (include General Purpose Fume Cupboard) complete with ducting material, documentations and installation as per quotation ref. no. DL/SDK/1122/007 dated 06/12/2022.</p> <p>The consultant Dynakey Laboratories Sdn. Bhd. Has established timeframe and the process flow. The monitoring of the progress will be conducted bas on timeframe established.</p> <p>The mill has included the progress of Fume Hood Notification in the Evaluation of License and Permit.</p> <p>The evidence found adequate to close the Major NC. Thus, the Major NC is effectively closed on 20/02/2023. Further verification will be conducted in the next surveillance audit.</p>

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2279315-202211-M3	<b>Issue Date:</b>	25/11/2022
<b>Due Date:</b>	23/02/2023	<b>Date of Closure:</b>	20/02/2022
<b>Area/Process:</b>	Pamol Kluang Palm Oil Mill	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.4.4.2 Major
<b>Requirements:</b>	The occupational safety and health plan should cover the following: b) The risk of all operations shall be assessed and documented.		

	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).
<b>Statement of Nonconformity:</b>	Mitigation Plans related H&S Risk was not fully implemented.
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>• During site visit at the Shovel operations at the EFB Yard, it was found that the Shovel was without side mirrors, rear view mirror, reverse sensor and threadless tyres. HIRARC for Shovel dated 16/02/2022 was reviewed. The monitoring of the risk control was not effectively implemented.</li> <li>• Tractor driver from Pamol Timur Estate sighted not wearing safety boots required while driving and delivering FFB at Loading Ramp. HIRARC for Tractor dated 16/02/2022 found stated Safety Boots is one of the required PPE other than Helmets and gloves.</li> </ul>
<b>Corrections:</b>	<p>a) Pamol Mill has instructed the contractor to stop using the shovel with immediate effect until he repairs and installs the side mirrors, rear view mirror, reverse sensor and change the tires.</p> <p>b) The AP in-charge has been given a verbal warning to ensure that all persons entering the mill workplace e.g. ramp, weighbridge, process area wear proper safety shoes and hard hat.</p> <p>Appendix 4.3.1.1 (a): Record of verbal warning to Auxiliary Police.</p>
<b>Root cause analysis:</b>	<p>a) The owner of the shovel who is a an EFB contractor failed to follow IOI's safety procedures and ensure vehicles like shovel are in safe condition despite this being mentioned in the contract agreement and during safety briefing by the mill.</p> <p>b) The Auxiliary Police who were supposed to ensure all drivers wear safety shoes &amp; hard hats failed to do so due to a high number of vehicles entering the mill that afternoon. Moreover, as the driver of the tractor from a neighbouring estate was wearing rubber boots, the AP thought the boots had steel toe/sole.</p>
<b>Corrective Actions:</b>	<p>a) A shovel checklist has been developed and issued to the contractor to carry out daily inspection of his shovel and working equipment in the workplace.</p> <p>Appendix 4.3.1.1 (b): Duly completed shovel checklist.</p> <p>b) A checklist has been developed and implemented. Pamol Mill will carry out routine inspections to ensure shovels are in good condition and repairs are carried out as soon as possible. Training was conducted for all APs to ensure proper checking is carried out before vehicles are allowed to enter the mill compound.</p> <p>Appendix 4.3.1.1 (c): Duly completed workplace inspection.</p> <p>Appendix 4.3.1.1 (d): Retraining to APs.</p> <p>c) A memo was sent to all mill APs, contributing estates and contractors to wear safety shoes and hard hat if entering the mill workplace e.g. ramp, weighbridge, process area. Training was conducted for all APs to ensure proper checking is carried out before anyone or vehicle is allowed to enter the mill compound.</p>

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	Appendix 4.3.1.1 (e): A memo to use PPE to APs, contributing estate and contractors.
<b>Assessment Conclusion:</b>	<p>Verified the evidence for the Major NC Close out as follows:</p> <p>The mill has conducted training to the mill Aps on the Safety Operating Procedures for Security and proper checking before anyone or vehicle is allowed to enter the mill compound. Reviewed the training attendance, training materials and training evaluations for training conducted on 13/12/2022.</p> <p>The mill has issued memo to all APs, contributing estate and contractors and vehicle drivers on compulsory to wear PPE in the mill compound dated 30/11/2022.</p> <p>The mill manager has issued warning to all the Aps, on failure to control the use of PPE for contractor workers entering the factory area as per show caused letter dated 13/12/2022.</p> <p>The mill has established Daily Monitoring Checklist for shovel. Reviewed the monitoring records for the month of December 2022 and January 2023.</p> <p>The mill has included the shovel/vehicle monitoring in the workplace inspection. Reviewed the workplace inspection records for the month of December 2022 and January 2023.</p> <p>The evidence found adequate to close the Major NC. Thus, the Major NC is effectively closed on 20/02/2023. Further verification will be conducted in the next surveillance audit.</p>

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2279315-202211-N1	<b>Issue Date:</b>	25/11/2022
<b>Due Date:</b>	Next Surveillance	<b>Date of Closure:</b>	Open
<b>Area/Process:</b>	Pamol Kluang Palm Oil Mill	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.5.1.3 Minor
<b>Requirements:</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.		
<b>Statement of Nonconformity:</b>	The environmental management plan established was not effectively implemented.		
<b>Objective Evidence:</b>	<p><u>Pamol Kluang Palm Oil Mill</u></p> <p>Sighted during site visit at the EFB yard, it was noticed that the drain surrounding the EFB yard was clogged with EFB and soil. It was noted that leachate from the drain was overflow onto the adjacent ground.</p> <p>As stated in the environmental management plan, all leachate from the EFB collection yard must be diverted back into effluent system. This show that the management plan established was not effectively implemented.</p>		
<b>Corrections:</b>	Mill management have carried out cleaning work for the clogged drain at the EFB yard on 21st November 2022.		
<b>Root cause analysis:</b>	Referring to the environment impact assessment reviewed on 17th November 2022, the potential environment negative impacts from EFB production and its heaping had been covered in the assessment document. However, the plan and monitoring programme to mitigate this impact was not stated in the environment impact assessment (EIA). Thus, it was not implemented by the mill.		

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<b>Corrective Actions:</b>	Environment Impact Assessment has been reviewed by including the monitoring programme to mitigate the possible environment impact. Furthermore, a weekly- monitoring checklist had been developed and sent to the mill to ensure the perimeter drain is always in a good condition.
<b>Assessment Conclusion:</b>	The effectiveness implementation of the Corrective Action Plan submitted will be assessed during next assessment.

<b>Opportunity For Improvement</b>			
<b>Ref:</b>	2279315-202211-I1	<b>Clause:</b>	MSPO 2530 Part 3: 4.4.5.5
<b>Area/Process:</b>	Kahang Estate, Swee Lam Estate and Mamor Estate		
<b>Objective Evidence:</b>	The worker masterlist may improve on monitoring the period of workers passport and work permits validity.		

<b>Opportunity For Improvement</b>			
<b>Ref:</b>	2279315-202211-I2	<b>Clause:</b>	MSPO 2530 Part 3: 4.4.5.11
<b>Area/Process:</b>	Kahang Estate, Swee Lam Estate and Mamor Estate		
<b>Objective Evidence:</b>	The linesite inspection can be further improved to identify all potential issue which may lead to uncondusive conditions.		

<b>Opportunity For Improvement</b>			
<b>Ref:</b>	2279315-202211-I3	<b>Clause:</b>	MSPO 2530 Part 4: 4.4.5.8
<b>Area/Process:</b>	Pamol Kluang Palm Oil Mill		
<b>Objective Evidence:</b>	The management can be enhanced on the understanding of working hours, break and overtime among employees.		

<b>Opportunity For Improvement</b>			
<b>Ref:</b>	2279315-202211-I4	<b>Clause:</b>	MSPO 2530 Part 3: 4.3.1.2
<b>Area/Process:</b>	Kahang Estate, Swee Lam Estate and Mamor Estate		
<b>Objective Evidence:</b>	The established Legal Requirement Register dated May 2019 can be further improved with better arrangement, grouping and inclusion of the identified acts and its subsidiary regulations.		

<b>Noteworthy Positive Comments</b>	
1	Good commitment from the management teams on the documentation and preparation of the audit.
2	Positive feedbacks from the Internal and External Stakeholders.
3	Good maintenance and cleanliness at the housing area.
4	Good contribution to the local communities.

**3.3 Status of Nonconformities Previously Identified and OFI**

Non-Conformity Report			
<b>NCR Ref #:</b>	2136957-202111-M1	<b>Issue Date:</b>	26/11/2021
<b>Due Date:</b>	27/01/2022	<b>Date of Closure:</b>	09/12/2021
<b>Area/Process:</b>	Pamol Kluang POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.4.5.9 Major
<b>Requirements:</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.		
<b>Statement of Nonconformity:</b>	The management unable to monitor overtime for workers.		
<b>Objective Evidence:</b>	As per verification by the auditor, there is no evidence that overtime has been properly monitored by the POM management.		
<b>Corrections:</b>	<p>Pamol Kluang POM Management has immediately told all workers to thumb print "out" before starting break time and "in" after break. An "overtime requisition" form has also been created for the workers and Management to record actual overtime work carried out. Workers are required to sign the "overtime requisition" form if they agree to the overtime hours offered before commencing work.</p> <p>Please refer to the following appendix:  Appendix 1: Overtime Requisition form</p>		
<b>Root cause analysis:</b>	As Pamol Kluang POM management monitors normal working hours and overtime by using "fingerflex" system where workers thumbprint before and after working hours, they felt that it was sufficient to monitor overtime. However, as some workers fail to thumbprint during "break hours", the data in the system incorrectly shows that they have worked extra OT hours.		
<b>Corrective Actions:</b>	<p>A flow-chart has been prepared for management to better monitor normal and overtime working hours and payment.</p> <p>The "Overtime Requisition" form is also improved to ensure workers request for overtime work before commencing work. With the agreement of the workers concerned, Management shall revise the working hours accordingly in the Overtime Requisition form if there are any changes to the original OT hours requested.</p> <p>Management shall use the attached "Overtime Requisition" form (Appendix 1) and flow-chart (Appendix 2) to monitor payment of wages for normal and overtime work carried out by all workers.</p> <p>Please refer to the following appendix:  Appendix 2: Overtime Requisition Flow Chart</p>		
<b>Assessment Conclusion:</b>	The implementation of corrective actions was found effective and thus, major non-conformance was closed on 09/12/2021.		
<b>Verification Statement:</b>	Pamol Kluang POM used the overtime requisition form established with effect 01/12/2021. Workers request for overtime work before commencing work. With the agreement of the workers concerned, Management will revise the working hours accordingly in the Overtime Requisition form if there are any changes to the original OT hours requested.		

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	<p>Management use the attached "Overtime Requisition" form (Appendix 1) and flow-chart (Appendix 2) to monitor payment of wages for normal and overtime work carried out by all workers.</p> <p>Pamol Kluang POM's sampled workers implement being review with latest requisition dated 30/10/2022 as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Job Descriptions</th> <th>Originality</th> <th>Passport / IC No</th> </tr> </thead> <tbody> <tr><td>1.</td><td>Process Shift A</td><td>India</td><td>P8992517</td></tr> <tr><td>2.</td><td>Process Shift A</td><td>Nepal</td><td>12230194</td></tr> <tr><td>3.</td><td>Effluent Operator</td><td>India</td><td>P8993044</td></tr> <tr><td>4.</td><td>Process Shift B</td><td>India</td><td>R0689659</td></tr> <tr><td>5.</td><td>Process Shift A</td><td>Nepal</td><td>11881805</td></tr> <tr><td>6.</td><td>Auxiliary Police</td><td>Malaysia</td><td>990315-03-XXXX</td></tr> <tr><td>7.</td><td>Effluent Operator</td><td>Malaysia</td><td>740916-01-XXXX</td></tr> <tr><td>8.</td><td>Process Shift B</td><td>Myanmar</td><td>MF245503</td></tr> <tr><td>9.</td><td>Process Shift B</td><td>Myanmar</td><td>ME95786</td></tr> </tbody> </table> <p>The implementation based on established overtime requisition form is satisfactory. No recurrence of issued observed, thus the major NC is remained closed.</p>	No.	Job Descriptions	Originality	Passport / IC No	1.	Process Shift A	India	P8992517	2.	Process Shift A	Nepal	12230194	3.	Effluent Operator	India	P8993044	4.	Process Shift B	India	R0689659	5.	Process Shift A	Nepal	11881805	6.	Auxiliary Police	Malaysia	990315-03-XXXX	7.	Effluent Operator	Malaysia	740916-01-XXXX	8.	Process Shift B	Myanmar	MF245503	9.	Process Shift B	Myanmar	ME95786
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9.	Process Shift B	Myanmar	ME95786																																						

Non-Conformity Report			
<b>NCR Ref #:</b>	2136957-202111-M2	<b>Issue Date:</b>	26/11/2021
<b>Due Date:</b>	27/01/2022	<b>Date of Closure:</b>	09/12/2021
<b>Area/Process:</b>	Pamol Barat Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.5.9 Major
<b>Requirements:</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.		
<b>Statement of Nonconformity:</b>	The management unable to monitor overtime for workers.		
<b>Objective Evidence:</b>	<p>During the audit, the auditor identified 1 worker works 2 types of job daily which are as manuring workers during daytime and as watchmen at night. Based on pay slips sighted, the workers have been paid daily rate and overtime (manuring works) and piece rate (watchman).</p> <p>As per calculation has been made, the worker works more than 12 hours a day and did not comply with Employment Act 1955 Seksyen 60A (b).</p>		
<b>Corrections:</b>	<p>Pamol Barat management issued a letter to the worker on 1/12/2021 to stop him from Watchman work at night-time (Appendix 1). The social liaison officer explained to the worker that according to Employment Act 1955 Section 60A (b) a worker cannot work more than 12 hours/day. However, the management will still offer other suitable jobs as long as it does not violate the Employment Act 1955. Though the worker requested not to be terminated from the night watchman job, he eventually agreed to the termination (Appendix 2 &amp; 3).</p> <p>Please refer to the following appendixes:</p> <p>Appendix 1: Letter from Pamol Barat Estate management to Alam JD Jahangir.</p> <p>Appendix 2: Reply Letter from Alam JD Jahangir to Pamol Barat Estate management.</p> <p>Appendix 3: Pictures of consultation to the workers.</p>		

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<b>Root cause analysis:</b>	As there's a shortage of workers due to the pandemic related travel restrictions, Pamol Barat could not employ or assign separate workers to carry out night watchman work despite advertising for vacancies. Moreover, the worker involved (Alam JD Jahangir) who is very hardworking requested to work as the watchman to increase his income as the work only requires him to be at the buffalo shed without any manual work. He also admitted to resting and sleeping most of the time.
<b>Corrective Actions:</b>	Pamol Barat Estate management issued a memo dated 01/12/2021 to the Auxiliary police and requested them to supervise and patrol the buffalo shed from 06/12/2021 according to the Auxiliary Police Duty Roaster (Appendix 4).  Please refer to the following appendix:  Appendix 4: Memo from Pamol Barat Estate management to their Auxiliary Police and "Jadual Tugasan Harian Polis Bantuan".
<b>Assessment Conclusion:</b>	The implementation of corrective actions was found effective and thus, major non-conformance was closed on 09/12/2021.
<b>Verification Statement:</b>	Kahang Estate, Swee Lam Estate and Mamor Estate managements has monitor overtime to the affected workers using overtime form.  Document review of requisition of all sampled of employees' overtime form with latest for month of October 2022 are 4 hours and less per day.  The form includes detail of work description for the task, overtime start and overtime end, number of overtime hours taken, employee signature, staff in charge's signature, assistant manager's signature for review and manager's signature for approval.  The approval of overtime by the management will then key-in into online checkroll SAP system, auto generated, calculated, and included for wages payment at the end of the month.

<b>Opportunity For Improvement</b>			
<b>Ref:</b>	2136957-202111-I1	<b>Clause:</b>	MSPO 2530 Part 3: 4.3.2.2
<b>Area/Process:</b>	Unijaya Estate		
<b>Objective Evidence:</b>	As per verification at Unijaya Estate, sighted total 32 land title that mentioned land use right is for rubber planting. Application to change the land used right has been made in year 2018. It's can be further improved by follow up and monitor the status of the application.		
<b>Verification Statement:</b>	Follow up still on going as waiting for the approval of land office based on document verified.		

**3.4 Summary of the Nonconformities and Status**

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
1855284-201911-M1	4.3.1.1 Part 4 Major	28/11/2019	Closed on 21/02/2020
1855284-201911-M2	4.3.1.1 Part 3 Major	28/11/2019	Closed on 21/02/2020
1992729-202011-M1	4.6.1.1 Part 4 Major	27/11/2020	Closed on 14/01/2021



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1992729-202011-M2	4.6.3.2 Part 3 Major	27/11/2020	Closed on 14/01/2021
1992729-202011-M3	4.4.5.9 Part 3 Major	27/11/2020	Closed on 14/01/2021
1992729-202011-N1	4.3.1.4 Part 3 Minor	27/11/2020	Closed on 27/01/2021
2136957-202111-M1	4.4.5.9 Part 4 Major	27/11/2021	Closed on 09/12/2021
2136957-202111-M2	4.4.5.9 Part 3 Major	27/11/2021	Closed on 09/12/2021 escalated from Minor to Major.
2279315-202211-M1	4.3.1.1 Part 3 Major	25/11/2022	Closed on 20/02/2023
2279315-202211-M2	4.3.1.1 Part 4 Major	25/11/2022	Closed on 20/02/2023
2279315-202211-M3	4.4.4.2 Part 4 Major	25/11/2022	Closed on 20/02/2023
2279315-202211-N1	4.5.1.3 Part 4 Minor	25/11/2022	Open

**3.5 Issues Raised by Stakeholders**

IS #	Description
<b>1</b>	<p><b>Feedbacks: Contractors, (Representative from Jayakumar Maju Jaya Enterprise, Ah Teng Earthwork Construction Sdn Bhd and Aviya Contractor)</b></p> <p>1 contractor has been contacted and interviewed which are Jayakumar Maju Jaya Enterprise (Hired Tractors Machine, Ah Teng Earthwork Construction Sdn Bhd (Replanting Contractor) and Aviya Contractor (Hired Tractor Machine). Based on interview, the contractor agreed good relationship has been established between management and contractors. The contractor also mentioned that the payment paid within 30 days or 60 days as per terms and conditions agreed by both parties. Contractor was being briefed regarding RSPO &amp; MSPO during stakeholders meeting.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issues.</p>
<b>2</b>	<p><b>Feedbacks: Retailer (Representative from Mak Jun Cafe)</b></p> <p>Management has given a briefing related implementation of MSPO matters. All rules set by management related MSPO need to follow by them. The retailer will share the price of food sold's price appeared at the cafe. No complaint or grievances recorded.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
<b>3</b>	<p><b>Feedbacks: Union, (NUPW Kluang Branch Office)</b></p> <p>Interview with the officers inform the election for NUPW were made through vote among employee who's joint the union. Most of the employee joined NUPW and no restriction from the company. No serious complaint from the workers, mainly for the housing maintenance and overtime which solve internally by the workers and operating units' managements. The officers inform that, the new agreement for wages raised proposal with MAPA is still in process of approval, yet to get have a solid decision.</p>





	<p>The officers required improvement on communication channel between NUPW and IOI Group’s estate &amp; mill managers if their office communicate within email and telephone. The officers inform the estate need to improve on safety requirement on estate road as mitigation to control risk of road accident.</p> <p><b>Management Responses:</b>  Estate management apologizes on the poor communication between them and any of their stakeholders due to poor connectivity in their estate. Estate management is in the stage of proposal budget on upgrading their communication tools in estate. This will take time due to budget approval from the top management. Estate management will ensure safety in estate as top of priority, due to weather especially in raining season will cause estate road is in bad condition. Estate management will always to ensure the estate road will be re-grading during dry season.</p> <p><b>Audit Team Findings:</b>  No other issues.</p>
<p><b>4</b></p>	<p><b>Feedbacks: Estates Employee (Sampled Local and Foreign employee)</b>  Interviewed with sampled employees from mill and estates. Informed that they attended training and briefing which conducted by their employer. Employees informed they are being given with equal wages, equal welfare, and equal benefits as per stated in their employment contract. Employees being paid either with daily rated and piece rated are understandable on how their salary being calculated. Any deduction from employee, will be communicate and have mutually agreement. Employees informed they are aware and being brief of any new deduction or new wages during muster call. Estate employee have no concern raised. While there is concern raised by Mill employee who have raised question on confusion of their working hours.</p> <p><b>Management Responses:</b>  Management do aware about the concern will be communicate with their employees.</p> <p><b>Audit Team Findings:</b>  Mill management need to brief clearly to employee about the nature of shift working hours in mill.</p>

### 3.6 List of Stakeholders Contacted

<p><b>Government Officer:</b></p>	<p><b>Community/neighbouring village:</b>  NUPW Officer  Mak June Café</p>
<p><b>Suppliers/Contractors/Vendors:</b>  Jayakumar Maju Jaya Enterprise  Ah Teng Earthwork Construction Sdn Bhd  Aviya Contractor</p>	<p><b>Worker’s Representative/Gender Committee:</b>  Local employee  Foreigner employee (Indonesia)  Foreigner employee (Bangladesh)  Foreigner employee (India)  Foreigner employee (Nepal)</p>

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
<p>Based on the findings during the assessment Pamol Kluang Palm Oil Mill, and Supply Bases (Pamol Timur Estate, Pamol Barat Estate, Mamor Estate, Unijaya Estate, Kahang Estate and Swee Lam Estate) Certification Unit complies with the MS 2530-3:2013 or MS 2530-4:2013. It is recommended that the certification of Pamol Kluang Palm Oil Mill, and Supply Bases (Pamol Timur Estate, Pamol Barat Estate, Mamor Estate, Unijaya Estate, Kahang Estate and Swee Lam Estate) Certification Unit is approved and continued.</p>	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<p><b>Name:</b> Mohamad Zulkarnain bin Zubir Ahmadi</p>	<p><b>Name:</b> Muhammad Fadzli b. Masran</p>
<p><b>Company name:</b> IOI Plantation Services Sdn Bhd</p>	<p><b>Company Name:</b> BSI Services Malaysia Sdn. Bhd.</p>
<p><b>Title:</b> Assistant Manager, Sustainability</p>	<p><b>Title:</b> Client Manager</p>
<p><b>Signature:</b> </p> <p><b>Date:</b></p>	<p><b>Signature:</b> </p> <p><b>Date:</b> 27/02/2023</p>
<p>01/03/2023</p>	

**Appendix A: Summary of the findings by Principles and Criteria**

**MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	IOI Group has established internal policy title 'Sustainable Palm Oil Policy' in October 2020 that has been signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer and Dr Surina Ismail, Group Head of Sustainability.  Document review, the policy described management committed to comply with all applicable legislation and code of practices, to achieve higher level of transparency and stakeholder's engagement, to build traceable supply chain such that all suppliers are also in compliance with company commitment.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	IOI Group has established internal policy title 'Sustainable Palm Oil Policy' in October 2020 that has been signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer and Dr Surina Ismail, Group Head of Sustainability.  Document review, the policy describes in clause 4 on the management committed towards sustainable production of palm oil and its continuous as outline in the MSPO guidelines.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for	As in Internal audit procedure "Internal audit" dated 03/05/2018 SOP 8. The scope of the procedure is to establish systems that may be	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	further improvement. <b>- Major compliance -</b>	utilized to comply with the relevant element of a formal certification scheme. Mentioned in the procedure that internal audit needs to be done at least once a year to determine the strength and weaknesses and potential area for further improvement applicable to all estates (Kahang, Swee Lam and Mamor).	
<b>4.1.2.2</b>	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. <b>- Major compliance -</b>	Internal audit procedure has been established and documented in the document title "Internal audit" dated 03/05/2018 SOP 8. The scope of the procedure is to establish systems that may be utilized to comply with the relevant element of a formal certification scheme. 2 NCR raised under 4.5.3.1 and 4.5.6.3 as Letter dated 02/11/2022 issued to Zakaria Jamal (Estate Manager) from Lead Auditor. The letter required action to be taken to rectify the NCR issues and propose corrective and preventive measure within 14 days of the date of the letter. Internal Audit Report for Mamor Estate documented and available as sampled. Internal Audit was conducted on 26/10/2022. All NCR raised were investigated and proposal for Corrective Actions and Preventive measures made accordingly as verified.	Complied
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	Internal Audit Report was distributed and issued to managers IOI Kahang, Swee Lam and Mamor Estates as they endorsed and signed the Internal Audit Report respectively.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	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. <b>- Major compliance -</b>	Management Review was conducted as evidence of Minutes of Management Review on Sustainability for PAMOL Kluang Grouping held on 20/10/2022 at Meeting Room, PAMOL Clubhouse. Attended by Agos Atan (Sr. Manager Sustainability), Muhamad Zulkarnain b. Zubair Ahmadi (Asst Manager Sustainability), Rajan A/L Sinnathamby (Acting Mill Manager) Chua Seng Wei (Sr. Asst Mill Manager), Zakaria b. Jamal	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		(Kahang Estate), Lim Wei Kiat (Estate Manager) and other Estates Managers and Assistants. Various issues discussed related to MSPO, internal audit results, mill/estates performances, continual improvement, complaints and grievances, Resources and training needs and etc.	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. <b>- Major compliance -</b>	The recommended improvement in Social impact found listed in Action Plan in Kahang Estate: <ul style="list-style-type: none"> <li>• To upgrade current community hall in providing good amenities to people in Kahang.</li> <li>• To upgrade total of 54 workers housing and upgrade living standard.</li> <li>• To maintain good relationship between management and workers by having Family Day.</li> </ul>	Complied
<b>4.1.4.2</b>	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. <b>- Major compliance -</b>	Currently Kahang Estate and Swee Lam Estate has practices mechanization to overcome manpower shortage due to COVID-19. Such as mechanized fertilizer application, power wheelbarrow, badang, Grabber. Mamor Estate has practices a mechanization to overcome manpower shortage by using Grabber, Mist Blower, Mechanized fertilizer application. To improve tracking and FFB production, EPMS for tracing harvesting of FFB was implemented in the estate.	Complied
<b>4.1.4.3</b>	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. <b>- Major compliance -</b>	The estate management (Kahang, Swee Lam and Mamor) have established annual training program based on the training needs analysis. 2022 to provide knowledge and competency of mechanisation programme implemented as verified.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<b>4.2 Principle 2: Transparency</b>		
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>		
<p><b>4.2.1.1</b></p> <p>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.</p> <p><b>- Major compliance -</b></p>	<p>IOI Group conduct external stakeholders meeting at respective estate as below:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate and Mamor Estate dated 14/10/2022 with 36 participants.</li> <li>2. Swee Lam Estate dated 23/08/2022 with 19 participants.</li> </ol> <p>Document review on minutes of meeting, Kahang Estate, Swee Lam Estate and Mamor Estate managements have brief on the list of documents that stakeholder can have access and request to external stakeholders in Bahasa Malaysia. The briefing includes process of documents to be accessed and location of Sustainability Corner display at each estate and mill office.</p> <p>Kahang Estate, Swee Lam Estate and Mamor Estate adopt IOI Group’s Stakeholder Request Procedure, SOP 12.0 and individually update by respective estates as below:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate on 25/10/2022</li> <li>2. Swee Lam Estate on 24/10/2022</li> <li>3. Mamor Estate on 26/10/2022.</li> </ol> <p>The procedure describes the process and channel of external stakeholders request to respective estates level or corporate level by call at general line provided.</p>	<p>Complied</p>
<p><b>4.2.1.2</b></p>	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental</p> <p>IOI Group established Social Impact Assessment, Management Action Plans &amp; Continuous Improvement Plan which includes Stakeholder</p>	<p>Complied</p>

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	<p>or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>Request Procedure, SOP 12.0 and individually update by respective estates as below:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate on 25/10/2022</li> <li>2. Swee Lam Estate on 24/10/2022</li> <li>3. Mamor Estate on 26/10/2022.</li> </ol> <p>The procedure describes the process and channel of external stakeholders request to respective estates level or corporate level by call at general line provided.</p> <p>Kahang Estate, Swee Lam Estate and Mamor Estate has listed documents that are publicly available include:</p> <ol style="list-style-type: none"> <li>1. Land titles / user rights</li> <li>2. Safety and health plan</li> <li>3. Plans and impact assessments relating to environmental and social impacts</li> <li>4. Details of complaints and grievances</li> <li>5. Negotiation procedures</li> <li>6. Continuous improvement plan</li> </ol>	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>IOI Group established Social Impact Assessment, Management Action Plans &amp; Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and individually update by respective estates as below:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate on 25/10/2022</li> <li>2. Swee Lam Estate on 24/10/2022</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>3. Mamor Estate on 26/10/2022.</p> <p>The SOP include flowcharts consist of process to manage employee grievance, sexual harassment, and land disputes with Appendix 9.0, Rev 1B, update 28/12/2020 as below document control number:</p> <ol style="list-style-type: none"> <li>1. 10.1 Employee grievance</li> <li>2. 10.2 Sexual harassment Grievance</li> <li>3. 10.3 Grievance for landowner issues.</li> </ol> <p>IOI Group brief on the procedures and flowcharts to external stakeholders during External Stakeholder meeting as follow:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate and Mamor Estate dated 14/10/2022 attendee with 36 participants.</li> <li>2. Swee Lam Estate dated 23/08/2022 attendee with 19 participants.</li> </ol>	
<b>4.2.2.2</b>	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p><b>- Minor compliance -</b></p>	<p>IOI Group at each of the respective estate nominate responsible person to be as social liaison officer as follow:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate Acting Manager, Mr. Zakaria Jamal has appointed Mr. Abdullah Anas Ahmad Zawawi, Assistant Manager as social liaison officer with appointment letter dated 01/10/2022.</li> <li>2. Swee Lam Estate Senior Assistant Manager, Mr. Lectumanan Naidu Rajoo has appointed Mr. Mohd Zul Aizat Bin Ramli, Assistant Manager as social liaison officer with appointment letter dated 20/07/2018.</li> <li>3. Mamor Estate Manager, Mr. Lim Wei Kiat has appointed Mr. Mohd Hilmie Bin Mansor, Assistant Manager as social liaison officer with appointment letter dated 06/06/2022.</li> </ol>	Complied



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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. <b>- Major compliance -</b>	Kahang Estate, Swee Lam Estate and Mamor Estate established individual list of stakeholders which include government bodies, relevant embassies, NGOs, neighbouring estates/ smallholders, neighbouring villagers, suppliers, contractors, transporters, worshipping areas and schools. From document review, the list consists of external stakeholders' names, type of agencies, address, contact persons and contact number/ email address. The list updated by respective estates as follow: 1. Kahang Estate on 01/10/2022 2. Swee Lam Estate on 11/10/2022 3. Mamor Estate on 01/09/2022.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
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). <b>- Major compliance -</b>	IOI Group has established traceability procedure: MSPO Supply Chain – Oil Palm Mills (Segregation), ref no: MSPOSC/SOP/SG/1, rev no: 02, dated on 01/09/2019. The purpose is applicable to incoming FFB, outgoing CPO & PK at RSPO certified mills that operate SG supply chain system. In Swee Lam Estate available additional Material Flow Chart for Certified FFB (SOP 1.6 Appendix 2, Rev.1b, Effective date: 01/01/2019). The process started from harvesting and loading of FFB to tractor until delivered to Mill.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Inspection on compliance with established traceability system sighted from Backlog Report where transaction and dispatch checked as sample for date of 02/09/2022 for Gang H02. Block 032 (PM14D), Total Bunch Harvested (2,796)	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Also sampled Daily Crop Production Report which used to reconcile actual FFB dispatched and received by mill where all information found correct as compared with Weight Bridge Tickets and Summary of Monthly Transaction to Mill.	
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The management of estates has appointed suitable staff to implement and maintain traceability system sampled: <ul style="list-style-type: none"> <li>• Sighted an Appointment Letter for Abdul Razzaq Mohamed Nasir (Asst. manager) as PIC for Supply Chain and Traceability for Kahang Estate dated 01/10/2022 approved by Zakaria Jamal (Estate Manager).</li> <li>• Mohd Zul Aizat b. Ramli (Asst Manager) was appointed as MSPO Supply Chain Officer for Swee Lam Estate as appointment Letter dated 02/08/2022 signed by Mohd Faizul Azlan Hilmy (Sr. Asst Manager).</li> <li>• Muhammad Mukhlis b. Mukhtar (Asst. Estate Manager) was appointed as MSPO Supply Chain Officer for Mamor Estate as Appointment Letter dated 01/04/2021 signed by Lim Wei Kiat (Estate Manager).</li> </ul>	Complied
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	In Kahang Estate record of sales maintained as sampled in the month of September 2022. Total delivered (from 01/09/2022 to 30/09/2022) or sold to mill 8,926.560 MT. Date recorder for each sales included: date, time (in/out), Transaction No, Net Weight. Lorry Number included: JHF2378, PGQ2757, NAR8533, NBC7839. While in Swee Lam Estate record of sales maintained as sampled in the month of September 2022. Total delivered (from 01/09/2022 to 30/09/2022) or sold to mill 1,073.280 MT. Also sighted record of dispatch (Weight Bridge Shit) Dispatch Slip No. 67688	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Date: 13/09/2022            Vehicle No: JMQ6271 (Sasaran Perentas Sdn. Bhd.)            Field: PM10D/PM14A/PM07D            Driver: Ismail            Net Weight: 34,020 Kg            Also verified with attached a document from Pamol Kluang POM (Weight Bridge Ticket)            Ticket No FB19045413            Date: 13/09/2022            Vehicle No: JMQ6271 (Ismail/Sasaran Perentas Sdn. Bhd.)            Supplier: Swee Lam Estate            MPOB License No: 617329002000            Graded OER: 22.43%            Block/Year: 10D/14A/07D            Supplier Weight: 34,020 Kg            Nett Weight 33,990 Kg.            In Mamor Estate record of sales maintained as sampled in the month of August 2022. Total delivered (from 01/08/2022 to 30/08/2022) or sold to mill 3,732.390 MT. Also sighted record of dispatch with information:            Date: 07/08/2022            Customer: Pamol Kluang Mill            Vehicle No: JRQ7917 (Driver: Raja) from Sasaran Perentas Sdn. Bhd.            Weight Chit No: 1341</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		Block No: 00D/04C/99E/09C Bunches: 1500 Net Weight: 33,660 Kg Above information was verified and found correct with Monthly Record of Sales for Month of August 2022.	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. <b>- Major compliance -</b>	In Kahang Estate sampled compliance to legal and other related requirements as maintained through documented license, permits, CF such as below: <ul style="list-style-type: none"> <li>• Subregulation 23(1) Form D under Water Services Industry Act 2006 and Water Services Industries (Licensing) Regulations 2007. License valid from 30/11/2021 to 29/11/2024 for conventional water facility with capacity of 31m3.</li> <li>• Licence under Section 7 of Water Enactment (Johor) 1921 to divert and abstract of surface water No. 07/A/Klg/058 for 100m3/day valid till 31/12/2022.</li> <li>• Diesel storage license No. Ref BPGK JH (KLU) 2154 SK under Regulation 9 (2) Supply Control Regulation 1974 for 18,000 litres diesel valid from 31/07/21-30/07/23.</li> <li>• MPOB License No. 502165302000 for Kahang Estate with land size, 2,420 Ha in Mukim Kahang, valid from 01/02/2023 to 31/01/2024.</li> <li>• 2 unit of genset in Genset Room was renewed for license from Suruhanjaya Tenaga. Allocation made on 27/06/2022 and status</li> </ul>	Major Non-conformity

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Criterion / Indicator	Assessment Findings	Compliance
	<p>approved pending payment to obtain the valid license that expired on 23/08/2022 for generation of 160 KW of electricity.</p> <ul style="list-style-type: none"> <li>• One unit of Air Compressor (PMT JH 20120461) having valid CF until 20/06/2023.</li> </ul> <p>In Swee Lam Estate sampled compliance to legal and other related requirements as maintained through documented license, permits, CF such as below:</p> <ul style="list-style-type: none"> <li>• MPOB License No. 617329002000 for Ladang Swee Lam with size of 1,572.11 Ha located in Mukim Senai, Kulai Johor.</li> <li>• Diesel storage for 13,600 Lit and Petrol for 100 Lit having Permit from KPDNKK Ref No. KPDNKK.J-JB/26/5A/11/262(P/D0(P13). Valid from 28/06/21 to 27/06/24.</li> <li>• License for diverting and abstracting water for quantity of 60m3 daily undersection 7, Water Enactment (Johor) 1921. License valid till 31/12/2022.</li> <li>• License Class Facility and Services) for Water Supply approved by SPAN for 3 years (13/02/2020-12/02/2023) under Reg. 25(1) Water Services Industries (Licensing) Regulations 2007.</li> <li>• Certificate of Fitness for Air Compressor No. PMT JH 13143 valid till 22/09/2023.</li> </ul> <p>While in Mamor Estate the compliance to legal and other requirements maintained as sighted:</p> <ul style="list-style-type: none"> <li>• KPDNKK permit for 15,000 Litres and 15,000 Litres Biodiesel B5 Ref. No. BPGK JH (KLU) 1967 SK, valid from 10/03/2021-09/03/23.</li> <li>• Certificate of Fitness for Air Compressor JH PMT 10634 found valid till 20/06/2023.</li> </ul>	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>• MPOB License No. 511691002000 for PAMOL Plantation (Mamor Estate), size 2,230 Ha. Valid from 01/04/2022-31/03/2023.</li> <li>• Water Diverting and Abstracting License under Section 7 Water Enactment (Johor) 19321 for 120m3 daily from surface water valid till 31/12/2022.</li> <li>• SPAN License for Private Water Supply System (Water Treatment) for capacity 0.37 Million Litres Daily (MLD). Valid from 30/06/23-29/06/25.</li> </ul> <p>Noted during site visit at Kahang Estate, 3 unit of gensets in Genset Room found not having Written Approval or notified to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. Thus, Major non-conformity were raised.</p>	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>Kahang Estate, Swee Lam Estate and Mamor Estate found established and identified list of applicable legal and other requirements as found in the Legal Requirement Register dated May 2019 signed and approved by Estate Manager on 25/09/2022. Among Listed included:</p> <ul style="list-style-type: none"> <li>• Occupational Safety and Health Act 1994 and its Regulations</li> <li>• Factories and Machinery Act 1967 and its Regulations</li> <li>• Environmental Quality Act 1974 and its Regulations</li> <li>• Uniformed Building By-Law 1984</li> <li>• Fire Services Act 1988</li> <li>• Electrical Services Act 1990</li> <li>• Pesticides Act 1974 and its Regulations.</li> <li>• Others</li> </ul>	OFI

Criterion / Indicator		Assessment Findings	Compliance
		However improvement can be further made to the existing legal and other requirements by better arrangement, grouping of the identified acts and its subsidiary regulations. Thus, OFI has been raised.	
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	Found Legal Requirement Register will be updated by the Sustainability, Safety & Health Department, IOI Plantation if any new amendments or new regulations coming into force.	Complied
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	The management of estates assigned responsible staff for monitoring compliance: <ul style="list-style-type: none"> <li>Abdul Razzaq b. Mohamad Nasir (Asst Manager) was appointed as Legal Liason Officer for Kahang Estate and Appointment Letter dated 01/10/2022 and approved by Estate Manager (Zakaria b. Jamal).</li> <li>Muhammad Mukhlis b. Mukhtar (Asst Estate Manager) was appointed as Legal Liason Officer for Mamor Estate as Appointment Letter dated 01/04/2021 signed by Lim Wei Kiat (Estate Manager).</li> </ul>	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	Kahang Estate operates on land PTD 3302 with size of 2,419.9009 Ha with Agriculture (Oil Palm Cultivation) as term stated in the land title. Swee Lam Estate operates on 35 freehold land titles with size of 1,572.07 Ha. This is stated in the List of Land Title Rev.02 dated 01/12/2021 updated 25/08/2022. Also available a Land Title Map for company (Nice Frontier Sdn. Bhd), Estate (Swee Lam).	Complied
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.	The land under lease of 99 year was registered on 26/11/1983. No Hakmilik: 010302HSD0008577. A documented land title for Kahang Estate owned by Industrial Oxygen Incorporated Berhad (IOI) for lot No. PTD 3302 in Mukim Kahang with size of 2,419.9009 Ha under lease	Complied

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Criterion / Indicator		Assessment Findings	Compliance																		
- Major compliance -		<p>of 99 years ended 25/11/2082. Sampled List of 35 Land Titles Rev.02 updatd 25/08/2022 with total area of 1,572.07 Ha, owned by Nice Frontier Sdn. Bhd (Swee Lam Estate) with Freehold tenure title. Further sampled on documented Land Title (Form 5DK) of 14<sup>th</sup> Schedule of National Land Code of Mukim Senai dated 12/09/2012 below found tally with actual term which stated oil Palm:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Land Title No</th> <th style="text-align: center;">Lot No</th> <th style="text-align: center;">Size</th> <th style="text-align: center;">Land Use for</th> <th style="text-align: center;">Term Use for</th> <th style="text-align: center;">Owner</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">No. 11 606</td> <td style="text-align: center;">1855</td> <td style="text-align: center;">3.4904</td> <td style="text-align: center;">Agriculture</td> <td style="text-align: center;">Oil Palm</td> <td style="text-align: center;">Nice Frontier Sdn. Bhd.</td> </tr> <tr> <td style="text-align: center;">No. 12 605</td> <td style="text-align: center;">1854</td> <td style="text-align: center;">2.934</td> <td style="text-align: center;">Agriculture</td> <td style="text-align: center;">Oil Palm</td> <td style="text-align: center;">Nice Frontier Sdn. Bhd.</td> </tr> </tbody> </table> <p>Stated in the Land Title List Hectarage in MPOB License and Area Statement must be tally with the total land title hectarage Term stated in land title must be same as planted crop. Found evidence of action taken with land office to comply with term and condition of land used as verified. Mamor Estate (PAMOL Plantation Sdn Bhd) have a document showing legal ownership from evidence of a notice received to collect a land title document from Register of Land Johor (Form F0 under Section 30 of National Land Code dated 17/10/2022. Stated land is Freehold status located in Mukim Niyor with Lot No. 2550, Ownership No. GRN 617565 with size of 2,330 Ha (previously 2225.469 Ha). Land category is agriculture with term of oil palm cultivation.</p>	Land Title No	Lot No	Size	Land Use for	Term Use for	Owner	No. 11 606	1855	3.4904	Agriculture	Oil Palm	Nice Frontier Sdn. Bhd.	No. 12 605	1854	2.934	Agriculture	Oil Palm	Nice Frontier Sdn. Bhd.	
Land Title No	Lot No	Size	Land Use for	Term Use for	Owner																
No. 11 606	1855	3.4904	Agriculture	Oil Palm	Nice Frontier Sdn. Bhd.																
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<b>4.3.2.3</b>	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	14 legally demarcated boundary marking as in the map in the land title in Kahang Estate. Trenching built and fencing as boundary marking other than pole erected as boundary marking. The estate is adjacent	Complied																		



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	- Major compliance -	to Zamrud Estate at Block PM07K, PM05J, PM02G, PM02H, PM07I, PM07E, PM07D on the north, Sembrong Estate on the left at Block PM07K, PM05D, PM05C, PM05A while Block PM01E, PM01C, PM01A are adjacent to Risda Sg. Chales Estate. On the south the estate is adjacent to Seong Thye Estates at Block PM01B and PM06A as sampled during site visit. The marking visibly maintained. Swee Lam Estate is a combination of 35 land lots and each have individual land boundary marking. Sample the boundary marking with the land belong to TNB transmission line at Block PM14E. The estate is adjacent to Kelan Estate on the north and IOI Properties land on the south. While in Mamor Estate a boundary stone sighted and visibly maintained at Block PM96C adjacent to smallholder estate.	
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 -	IOI Group established Social Impact Assessment, Management Action Plans & Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and individually update by respective estates as below: <ol style="list-style-type: none"> <li>1. Kahang Estate on 25/10/2022</li> <li>2. Swee Lam Estate on 24/10/2022</li> <li>3. Mamor Estate on 26/10/2022.</li> </ol> The SOP included in flowchart of 10.3 Grievance for land issues describes on the process of any land squatters' disputes handling as follow reference document: <ol style="list-style-type: none"> <li>1. Negotiation procedure through free, prior and informed consent SOP 6.11 appendix 5.0 effective date 17/01/2017.</li> </ol> Document review on complaints records and onsite interview with external stakeholder, no complaint or disputes recorded and issued. Thus, the criteria was not applicable.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	Not applicable since there is no customary right land for all estate.	Not applicable
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. <b>- Minor compliance -</b>	Not applicable since there is no customary right land for all estate.	Not applicable
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	Not applicable since there is no customary right land for all estate.	Not applicable
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	IOI Group established Social Impact Assessment, Management Action Plans & Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and individually update by respective estates as below: 1. Kahang Estate on 25/10/2022 2. Swee Lam Estate on 24/10/2022 3. Mamor Estate on 26/10/2022. Document review on the assessment, IOI Group’s estates has identified key social factors related to operating center and manage on appropriate measure by monitor the progress of the outcome in social	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>management plan.</p> <p>The key social factors identified as significant as follow:</p> <ol style="list-style-type: none"> <li>1. No recruitment fees</li> <li>2. Expectation for better income</li> <li>3. Comfortable labor quarters and amenities</li> <li>4. Placing water dispenser at the estates' offices</li> <li>5. Food waste in the drainage</li> <li>6. Placing dustbin for cleanliness and hygiene at the labor quarters.</li> </ol>	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>IOI Group established Social Impact Assessment, Management Action Plans &amp; Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and individually update by respective estates as below:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate on 25/10/2022</li> <li>2. Swee Lam Estate on 24/10/2022</li> <li>3. Mamor Estate on 26/10/2022</li> </ol>	Complied
<b>4.4.2.2</b>	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p>IOI Group established Social Impact Assessment, Management Action Plans &amp; Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and individually update by respective estates as below:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate on 25/10/2022</li> <li>2. Swee Lam Estate on 24/10/2022</li> <li>3. Mamor Estate on 26/10/2022</li> </ol>	Complied

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4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. <b>- Minor compliance -</b>	Onsite visit to Kahang Estate, Swee Lam Estate and Mamor Estate offices, observed the complaint and grievance book is available. Onsite interview with workers informed they been briefed on the complaint procedure, mechanism and availability of the complaint book at their office.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. <b>- Minor compliance -</b>	Kahang Estate, Swee Lam Estate and Mamor Estate briefed complaint procedure to external stakeholder during stakeholders meeting conducted as follow: 1. Kahang Estate & Mamor Estate on 14/10/2022 2. Swee Lam Estate on 25/07/2022. Kahang Estate, Swee Lam Estate and Mamor Estate briefed complaint and grievance procedure to employee during muster morning at each respective estates as follow: 1. Kahang Estate on 22/07/2022. 3. Swee Lam Estate on 27/05/2022. 4. Mamor Estate on 09/08/2022.	Complied
4.4.2.5	Complaints and resolutions for the last 24 month shall be documented and made available to affected stakeholders upon request. <b>- Major compliance -</b>	Kahang Estate, Swee Lam Estate and Mamor Estate manage and maintained for past 24 months at each respective estate. Document review on logbook title complaint / grievance book and onsite interview with external stakeholder, no complaint or disputes recorded and issued. The record is only capture housing repair lodge by workers and the management responded as per timeline as follow:- 1. Kahang Estate received latest repair lodged on 17/05/2022. 2. Swee Lam Estate received latest repair lodged on 20/05/2022. 3. Mamor Estate received latest repair lodged on 06/05/2022.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development		
<b>4.4.3.1</b> Growers should contribute to local development in consultation with the local communities. <b>- Minor compliance -</b>	<p>IOI Group has developed contribution program to local development through Yayasan Tan Sri Lee Shin Chin contribute various program includes education, community welfare, medical assistance natural disaster, social enterprise and promotion of Science, Technology, Engineering and Mathematics (STEM). The program display in IOI Group website at <a href="http://yayasan.ioigroup.com">yayasan.ioigroup.com</a> and internal news of 'Berita IOI' with latest issue no.: 95 (Jul – Sep 2022).</p> <p>IOI Group has advertised job vacancy to local community surrounding by displayed at MyFuture Jobs, Facebook page, Instagram Page and Tiktok Page dated 01/10/2022.</p> <p>Other than that, each of respective estate contribute donation to their respective local community surrounded as follow details.</p> <ol style="list-style-type: none"> <li>1. Kahang Estate donate to PIBG of Sekolah Kebangsaan Ladang Pamol.</li> <li>2. Swee Lam Estate supply clean water to Temple Dewi Sri Nagakani Alayam, give permission to use estate road for 'Larian Amal Tadika Indahpura' and 'Pertandingan Kawad Kecekapan BOMBA'.</li> <li>3. Mamor Estate conduct worker sport activities and family day.</li> </ol>	Complied
<b>Criterion 4.4.4:</b> Employees safety and health		
<b>4.4.4.1</b> An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	<p>OSH and Hygiene Policy was established, documented and approved by N.B Sudhakaran (Plantation Director) on March 2022. The policy was communicated in both Bahasa and English languages. Sighted Safety and Health Management Plan documented at Kahang, Swee Lam and Mamor Estate (Jul 2020-July 2025).</p>	Complied

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		All estates (Kahang, Swee Lam and Mamor) having Safety and Health Programme for Year 2022. Programme included OSH Audit and Monthly Inspection, Vehicle Inspection, OSH Trainings, SOP Training, Notification to DOSH, Accident Notification, SHC Meeting, Medical Surveillance and Audiometric, ERP and Drill and etc.	
<b>4.4.4.2</b>	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:               <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> </li> <li>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).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust</li> </ul>	<ul style="list-style-type: none"> <li>a) OSH policy was communicated and implemented in all visited estates (Kahang, Swee Lam and Mamor). Sighted the policy posted at notice board in offices, store, workshop and etc. during site visit. The policy also communicated to worker as feedback during interview with group of harvester, manurers and sprayers.</li> <li>b) Available a HIRARC Masterlist. Listed 57 Process Locations such as Harvesting, Chemical Spraying, Manuring, Oil Palm Thinning, Chemical Store, Prunning, Premix, Nursery, Transporting FFB to mill, Workshop, Office operation and etc. dated 29/10/2022 with revision status individually in Kahang Estate. Risk 1-4 (Low), 5-12 (Medium) and 15-25 (High). Hirarc Form found comprehensive with category of hazard, risk evaluation, Justification of Likelihood, Risk Control (divided into each in hierarchy) and Risk Reevaluation. Noise Risk Assessment (NRA) was conducted as monitoring done on 18/2020 by Etosh Consult &amp; Engineering PLT and 02/04/2022 by Assessor Nur Izzati Salleh (HQ/16/PPEB/00/158).  Available a HIRARC Masterlist in Swee Lam Estate. Listed 57 Process Locations such as Harvesting, Chemical Spraying, Manuring, Oil Palm Thinning, Chemical Store, Prunning, Premix, Nursery, Transporting FFB to mill, Workshop, Office operation and etc. dated 29/10/2022. CHRA was conducted by Assessor (HQ/04/ASS/00/193) from Env Consultancy &amp; Monitoring Services Sdn. Bhd. on 20/03/2019. Noise Risk Assessment (NRA) was conducted by Assessor (HQ/16/PEB/00/158) from Etosh Consult &amp;</li> </ul>	Complied

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<p>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><b>- Major compliance -</b></p>	<p>Engineering PLT on 17/06/2020. Audiometric Test under Hearing Conservation Programme in July 2022 was conducted by RZ Intan Medicare Sdn. Bhd. Total of employee tested (7), Normal Hearing Threshold (5/71.4%), Abnormal Hearing Threshold/Hearing Loss (2/28.6%). While in Mamor Estate, HIRARC was conducted and revised on 29/10/2022 for 57 activities in estate operation. Noise Risk Assessment was conducted on 04/-7/2020 by Nur Izzati Salleh (HQ/16/PEB/00/158 from ETOSH Consult &amp; Engineering PLT. Activity assessed included Workshop, Knapsack Grass Cutter, Mist Blower Sprayer, Tractor Driver, Water Pump Operator. While for Personal Monitoring result only Workshop Maintenance and Water Pump Operator not expose to Above Noise Exposure Limit (NEL). On 09/04/2022 another NRA was conducted for Mechanical Buffolo, Ramp Operator, Grabber Driver, 3MT Roller Driver. Result all exposed to above NEL. Hearing Conservation Programme 2022 was conducted by RZ Intan Medicare Sdn. Bhd. 8 workers attended the audiometric test where resulted 2 (25%) Abnormal Threshold-Hearing Impairment, 0 (%) Retest, CHRA was conducted by Zakaria Abd Karim (HQ/04/ASS/00/193) from ENV Consultancy &amp; Monitoring Services Sdn. Bhd on 13/03/2019.</p> <p>Medical Surveillance was conducted for 22 workers involving Engine Driver, Sprayer, Rat Baiting, Pre-mixer, Foreman, Water treatment Operator and etc. On 27/05/2022 by Klinik Makmur, Kluang.</p> <p>c) In Kahang Estate, a Safe Chemical Handling Training was conducted on 07/10/2022 and as recorded found attended by mandore and two Sprayers. While in Swee Lam Estate a Chemical Handling Training was conducted on 29/07/2022 and attended by 3 Sprayers.</p>	

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	<p>d) As sampled during site visit at Block PM05E (Harvesters) provided and wearing cap, goggles, 95A Respirator, apron, nitrile gloves, safety boots (Wellington) and long sleeve shirt and PM05A (Manurer) provided with Safety helmet, gloves and Safety boots (Wellington). In Mamor Estate, Manurers provided and wear a cap, goggles, respirator, apron, nitrile gloves, wellington safety boots. A Sprayer also having similar PPE provided to them as site visit conducted.</p> <p>e) IOI Group has established and documented SOP for Safe Chemical Handling ((IOI-OSH 3.2.2) Rev.5, dated 06/01/2020. Explained the chemicals risk, PPE required, training required, Spraying handling process, After Spraying, Mixing Pesticides, Emergency requirement and etc. This SOP distributed and available at all estates (Kahang, Swee Lam and Mamor).</p> <p>f) In Kahang Estate, Safety and Health Committee (SHC) Organization Chart with composition of Chairman (Zakaria Jamal/Estate Manager), Abdul Razzaq/Secretary), Employees Representative (7 workers), Employer Representative (7 workers). Available Appointment Letter dated 13/09/2022 for period of 2 years from the date of the letter.</p> <p>Similarly in Swee lam Estate, available an Organization Chart of SHC for Swee Lam Estate where Chairman is Vickneswaran A/L Perumal (Chairman), Mohd Zul Aizat b. Ramli (secretary), Employer Representatives (3 Supervisors, Storekeeper, Office Staff and HA), Employees Representative (Sprayer, Manurer, Harvester, Workshop, Tractor Driver and Security). The Contractor represented by Transporter and Pawn Shop Operator. Mohd Zul Aizat b. Ramli (Asst Manager) was appointed as PIC for OSH for the year 2022-2023.</p>	



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	<p>g) In Kahang Estate, meeting of Safety and Health Committee (SHC) meeting was conducted quarterly in year 2022 on 13/09/2022, 27/06/2022, 29/03/2022. While In Swee Lam Estate, SHC meeting was regularly conducted as evidence from minutes of Meeting conducted on 21/09/2022, 17/06/2022, 16/03/2022, 15/12/21. Sampled in Mamor Estate, the SHC meeting was again quarterly conducted on 24/03/2022, 24/06/2022 and 14/09/2022. Available attendance list for attendees such as Estate Managers (Chairman), Assistant Managers (Secretary), HA/MA, Supervisors, Clerks, Storekeeper, Security, Mandores (Employer Representatives), Tractors Drivers, field operators (Employees Representatives). OSH issues discussed included accident cases reported as sighted in minute of meetings. Mamor Estate has established organization Chart for SHC Year 2022/2023 where Chairman is Lim Wei Kiat (Estate Manager), Secretary is Muhammad Mukhlis b. Mukhtar (Asst Manager), 10 Employer representatives and 10 employee's representative. As Chairman of SHC, he and other members had Appointment Letter dated 01/08/2022 from Zakaria Arshad (Plantation Controller).</p> <p>h) In Kahang Estate, available ERP Team Organization Chart 2022 where Estate Manager is the Emergency Commander. Available Accident Reporting Flowchart and Emergency Response Procedure (Accident &amp; Dangerous Occurrence Notification) flow chart that described process flow of both issues. ERT training was conducted on 07/11/2022 and attended by 11 workers (Mandores and staff).</p> <p>i) In Kahang Estate, First Aider training was conducted on 07/11/2022 attended by 9 workers (mandores, Asst Manager and Cadet Assistant). Sampled during site visit, mandore of manuring maintained a First aid box at site. In Mamur Estate Sighted List of</p>	

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		<p>30 trained first aider by Ha stated in Safety and health Management Plan with individual contact numbers. Also available and listed Location of First Aid Kit such as at Main Office, AP Post, Spraying Gang (Circle &amp; Selective), Spraying Gang (Mist Blower), Rat Baiting Gang, Manuring Gang, Harvesting Gang, Workshop, Chemical Store and replanting. Sighted first aid box inspection checklist conducted on monthly basis.</p> <p>j) In Kahang Estate, Form JKPP 8 was sent to DOSH on 12/01/2022. Two accident cases reported in 2021 where Kamal (MC 8 days and Taher Mohammed Abu (MC 18 days) and another 3 with no reporting cases. In 2022, Ali Mohammad Mortej injured his right hand due to from dried. 8 days MC. Injury from contact with frond. In Swee Lam Estate, minor accidents (MC less than 4 days) with cuts and first aid cases found reported and discussed and recorded in the minutes of the meeting conducted. Form JKPP 8 was submitted to DOSH on 12/01/2022 for statistic of accident occurred in 2021. 23 cases involving loss working day and 2 cases without loss working day. Total accident 25 and only one case (18 days MC) involving Saparudin Ismail. In Mamor Estate, Form JKPP 8 was submitted to DOSH on 26/01/2022 for statistic of incident in estate for year 2021 as required to be submitted before 31/01/2022 under NADOPOD 2004. 40 accidents were reported in 2021, while 2 cases (more than 4 days MC) reported: 1. Hossain Mohammad Babul (11 days MC) Leg hit by dropped FFB, 2. Hossain Md Ismail (43 days MC) hand injury hit by frond.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The	IOI Group established Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer and Dr	Complied

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	<p>policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Surina Ismail, Group Head of Sustainability dated 01/10/2020. Document review on the policy describe management commitment to comply with all applicable legislation and code of practices, to achieve higher level of transparency and stakeholder’s engagement, to build traceable supply chain such that al suppliers are also in compliance with company commitment.</p>	
<b>4.4.5.2</b>	<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><b>- Major compliance -</b></p>	<p>IOI Group established Equal Opportunity Employment and Freedom of Association Policies signed by N B Sudhakaran, Plantation Director dated 01/10/2017.</p> <p>Document review on the policy describes management will ensure workers will be received equal treatment based on relevant merits and competency regardless of gender, race, caste, nationality, religion, physical condition, sexual orientation, marital status and others.</p>	Complied

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<p><b>4.4.5.3</b> 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><b>- Major compliance -</b></p>	<p>IOI Group has signed Collective Agreement signed between and the National Union of Plantation Workers which came into force on 01/01/2020 and valid until 31/12/2022.</p> <p>Kahang Estate, Swee Lam Estate and Mamor Estate apply with new salary with MYR 1,500 follow as the Minimum Wages Order 2021.</p> <p>Document review on sampled payslip for March, May, June or October taken for verification. Based on the sampled, verified new wages into workers salary as stated in their payslip is paid accordingly.</p> <p>Kahang Estate's sampled of workers: -</p> <table border="1" data-bbox="1050 762 1861 1198"> <thead> <tr> <th>No.</th> <th>Job Descriptions</th> <th>Originality</th> <th>Passport / IC No</th> </tr> </thead> <tbody> <tr><td>1.</td><td>Gardener</td><td>Malaysia</td><td>620423-01-XXXX</td></tr> <tr><td>2.</td><td>Gardener</td><td>Malaysia</td><td>680128-04-XXXX</td></tr> <tr><td>3.</td><td>Manurer Mandore</td><td>Malaysia</td><td>640728-71-XXXX</td></tr> <tr><td>4.</td><td>Watchman</td><td>Indonesia</td><td>AU231513</td></tr> <tr><td>5.</td><td>Harvester</td><td>Bangladesh</td><td>BQ0822667</td></tr> <tr><td>6.</td><td>Harvester</td><td>Nepal</td><td>07485411</td></tr> <tr><td>7.</td><td>Water Treatment Plant Operator</td><td>Bangladesh</td><td>BM0911169</td></tr> <tr><td>8.</td><td>Field worker</td><td>Bangladesh</td><td>BP0713736</td></tr> <tr><td>9.</td><td>Watchman</td><td>Nepal</td><td>09194748</td></tr> <tr><td>10.</td><td>Gardener</td><td>Malaysia</td><td>820423-01-XXXX</td></tr> <tr><td>11.</td><td>Harvester</td><td>Nepal</td><td>92180901</td></tr> </tbody> </table> <p>Kahang Estate's sampled payslip:</p> <table border="1" data-bbox="1050 1289 1861 1383"> <tbody> <tr> <td>JD</td> <td>Workshop Apprentice</td> <td>Harvester</td> <td>Harvester</td> </tr> <tr> <td>Originality</td> <td>Bangladesh</td> <td>Indonesia</td> <td>Nepal</td> </tr> </tbody> </table>	No.	Job Descriptions	Originality	Passport / IC No	1.	Gardener	Malaysia	620423-01-XXXX	2.	Gardener	Malaysia	680128-04-XXXX	3.	Manurer Mandore	Malaysia	640728-71-XXXX	4.	Watchman	Indonesia	AU231513	5.	Harvester	Bangladesh	BQ0822667	6.	Harvester	Nepal	07485411	7.	Water Treatment Plant Operator	Bangladesh	BM0911169	8.	Field worker	Bangladesh	BP0713736	9.	Watchman	Nepal	09194748	10.	Gardener	Malaysia	820423-01-XXXX	11.	Harvester	Nepal	92180901	JD	Workshop Apprentice	Harvester	Harvester	Originality	Bangladesh	Indonesia	Nepal	<p>Complied</p>
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JD	Workshop Apprentice	Harvester	Harvester																																																							
Originality	Bangladesh	Indonesia	Nepal																																																							

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Criterion / Indicator		Assessment Findings				Compliance																																												
		Passport/ IC No	BM0911169	AU235153	07486411																																													
		Day Rate/ Piece Rate	MYR 65.70 (Piece Rate)	MYR 74.51 (Piece Rate)	MYR 90.24 (Piece Rate)																																													
		Working day	25	25	25																																													
		Gross Salary	MYR 3,715.05	MYR 2,372.45	MYR 2,771.30																																													
		Deduction	MYR 53.85 (Income Tax)	MYR0	MYR0																																													
		Employer Contribution	MYR 46.90 (SOCSCO)	MYR 29.40 (SOCSCO)	MYR 34.41 (SOCSCO)																																													
		Nett Salary	MYR 3,661.20	MYR 2,372.45	MYR 2,771.30																																													
		<p><u>Swee Lam Estate's sampled of workers: -</u></p> <table border="1"> <thead> <tr> <th>No.</th> <th>Job Descriptions</th> <th>Originality</th> <th>Passport / IC No</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Harvester</td> <td>Nepal</td> <td>09641243</td> </tr> <tr> <td>2.</td> <td>Tractor Driver</td> <td>Indonesia</td> <td>AU209760</td> </tr> <tr> <td>3.</td> <td>Ramp Operator</td> <td>Bangladesh</td> <td>BQ0645971</td> </tr> <tr> <td>4.</td> <td>Harvester</td> <td>India</td> <td>S5406100</td> </tr> <tr> <td>5.</td> <td>Harvester</td> <td>India</td> <td>M4399086</td> </tr> <tr> <td>6.</td> <td>Field Operator</td> <td>Nepal</td> <td>07090643</td> </tr> <tr> <td>7.</td> <td>Driver</td> <td>Indonesia</td> <td>C5621125</td> </tr> </tbody> </table> <p><u>Swee Lam Estate's sampled of payslip: -</u></p> <table border="1"> <thead> <tr> <th>JD</th> <th>Havester</th> <th>Havester</th> <th>Tractor Driver</th> </tr> </thead> <tbody> <tr> <td>Originality</td> <td>India</td> <td>India</td> <td>Indonesia</td> </tr> <tr> <td>Passport/ IC No</td> <td>S5406100</td> <td>M4399086</td> <td>AU209760</td> </tr> </tbody> </table>				No.	Job Descriptions	Originality	Passport / IC No	1.	Harvester	Nepal	09641243	2.	Tractor Driver	Indonesia	AU209760	3.	Ramp Operator	Bangladesh	BQ0645971	4.	Harvester	India	S5406100	5.	Harvester	India	M4399086	6.	Field Operator	Nepal	07090643	7.	Driver	Indonesia	C5621125	JD	Havester	Havester	Tractor Driver	Originality	India	India	Indonesia	Passport/ IC No	S5406100	M4399086	AU209760	
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		Day Rate / Piece Rate	MYR 57.70 (Piece Rate)	MYR 57.70 (Piece Rate)	MYR 74.08 (Piece Rate)	
		Working day	22	22	25	
		Gross Salary	MYR 2,743.40	MYR 2,547.45	MYR 2,202.60	
		Deduction	MYR 300.00 (Advance)	MYR 300.00 (Advance)	MYR 222.35 (Advance, Electricity)	
		Employer Contribution	MYR 28.10 (SOCISO)	MYR 25.80 (SOCISO)	MYR 26.90 (SOCISO)	
		Nett Salary	MYR 2,443.40	MYR 2,247.45	MYR 1,980.25	
		<u>Mamor Estate's sampled of workers: -</u>				
		No.	Job Descriptions	Originality	Passport / IC No	
		1.	Security	Malaysia	851010-11-XXXX	
		2.	Workshop Attendance	Malaysia	840707-11-XXXX	
		3.	Tractor Driver	Malaysia	560331-01-XXXX	
		4.	Manurer	Bangladesh	EB0244925	
		5.	Sprayer	Bangladesh	BM0797942	
		6.	Driver	Nepal	11607076	
		7.	Field Maintenance	Nepal	6373973	
8.	Harvester	India	N0349727			
9.	Harvester	India	V3133848			
10.	FFB Loader	Indonesia	C2755223			
11.	Harvester	Indonesia	C8153459			
<u>Mamor Estate's sample for payslips: -</u>						
JD	Harvester	Security	Upkeep			

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Criterion / Indicator		Assessment Findings				Compliance
					Worker	
		Originality	Indonesia	Malaysia	Bangladesh	
		Passport/ IC No	C2755223	851010-01-XXXX	BM0797942	
		Day Rate/ Piece Rate	MYR 90.29 (Piece Rate)	MYR 57.70 (Daily Rate)	MYR 64.30 (Piece Rate)	
		Working day	26	25	26	
		Gross Salary	MYR 3,084.65	MYR 2,308.25	MYR 2,995.35	
		Deduction	MYR 311.50 (Advance, Electricity)	MYR 527.55 (Advance, EPF, SOCSO, Insurance SIP, Electricity)	MYR 212.40 (Advance, Electricity)	
		Employer Contribution	MYR 38.10 (SOCSO)	MYR 249.05 (EPF, SOCSO Insurance SIP)	MYR 24.40 (SOCSO)	
		Nett Salary	MYR 2,773.15	MYR 1,780.70	MYR 2,782.95	
<b>4.4.5.4</b>	<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><b>- Minor compliance -</b></p>	<p>IOI Group has ensured their contractors follow the industrial best practices in terms of hiring their own employee.</p> <p>monitor contractors' workers are paid according to minimum wages</p> <p>The contractor shall be solely responsible for their employees and workmen whereby the contractor shall pay and shall be solely responsible for the payment wages, salary, benefits, EPF contribution, SOCSO and any other benefits required under the laws of Malaysia.</p> <p>Document review on payslips, verified workers receive more than minimum wages, and SOCSO, EPF and EIS contributions made by both the workers and contractors.</p>				Complied

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		<p>Kahang Estate and Swee Lam Estate’s contractor is Sasaran Perentas Sdn Bhd with payslip latest for October 2022.</p> <p>Mamor Estate’s contractor is Tek Lee Construction Contractor with payslip latest for October 2022.</p>	
<b>4.4.5.5</b>	<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><b>- Major compliance -</b></p>	<p>Kahang Estate, Swee Lam Estate and Mamor Estate established list of employees consist of employee number, full name, division, wages, NRIC / Passport no, employment category, nationality, DOB, age, race, and status in the checkroll system updated October 2022.</p> <p>Document review, employee information includes date of entry, job description and period of employment are contained in the respective employment contracts.</p> <p><u>Opportunity for Improvement</u></p> <p>The worker masterlist may improve on monitoring the period of workers passport and work permits validity</p>	OFI
<b>4.4.5.6</b>	<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><b>- Major compliance -</b></p>	<p>Kahang Estate, Swee Lam Estate and Mamor Estate provide with fair contracts signed by both employee and employer. Both parties will have copy for reference.</p> <p>The employment contracts which contents comply with Employment Act 1955.</p> <p>Document review, the contracts were prepared in either Bahasa Malaysia (for Malaysians and Indonesians) and in dual language (English and either Nepali, Hindi, Bengali) for workers from India, Nepal or Bangladesh.</p>	Complied
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p>	<p>Kahang Estate, Swee Lam Estate and Mamor Estate established time recording system and monitored by field supervisor.</p>	Complied



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	- Major compliance -	Document review, overtime of worker will monitor by themselves, and the data will be transfer into overtime requisition form. The form then will be verified by field supervisor, assistant manager and manager.	
4.4.5.8	<p>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.</p> <p>- Major compliance -</p>	<p>Kahang Estate, Swee Lam Estate and Mamor Estate provide with fair contracts signed by both employee and employer. The employment contracts which contents comply with Employment Act 1955 includes with working hours of 8 hours and overtime.</p> <p>Working day for all estates starting from Monday to Saturday. As per mentioned in the employment contract, stated that working hours is from 6.30 am until 2.30 pm inclusive of 30 minutes of break time.</p> <p>Overtime rate which stated 1.5 for normal hours rate, 2.0 from normal rate for rest days and 3.0 for public holiday and will not exceed 104 hours per months</p>	Complied
4.4.5.9	<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>Kahang Estate, Swee Lam Estate and Mamor Estate provide with fair contracts signed by both employee and employer. Both parties will have copy for reference.</p> <p>The employment contracts which contents comply with Employment Act 1955.</p> <p>As per sampled of employee payslip verified, they paid as per requirement.</p> <p>Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted in indicator 4.4.5.3 above.</p>	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	IOI Group has forms of social benefits and insurance for all employees that mandatory contribute to local and foreign workers based on monthly contribution. This includes in the employment contract of	Complied

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	development, medical care and health provisions. <b>- Minor compliance -</b>	remuneration, working hours, rate of pay, leaves and any other benefits of employment entitle to them.	
<b>4.4.5.11</b>	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. <b>- Major compliance -</b>	<p>Kahang Estate, Swee Lam Estate and Mamor Estate provides for its employees, free houses, subsidised water and electricity, free medical treatment and facilities, worshipping facilities such as mosque, Hindu and Buddhist temples, chapel, futsal court, volleyball court, transport allowance for field checkers, mandores, and auxiliary police.</p> <p>Onsite visit to linesite and onsite interviews with workers, Kahang Estate, Swee Lam Estate and Mamor Estate able to demonstrate that workers living quarters provided are habitable and comply with the Employees' Minimum Standard of Housing and Accommodation and Amenities Act 1990.</p> <p>Kahang Estate, Swee Lam Estate and Mamor Estate conduct linesite inspection at each respective estates as below details:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate conduct on 26/10/2022.</li> <li>2. Swee Lam Estate conduct on 26/10/2022.</li> <li>3. Mamor Estate conduct on 21/11/2022.</li> </ol> <p><u>Opportunity for Improvement</u></p> <p>The linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.</p>	OFI
<b>4.4.5.12</b>	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	<p>IOI Group has been established in the document title Guidelines for handling harassment at workplace document number IOI/G/SE/004 revision 02 dated 26/11/2020.</p> <p>Mentioned in the policy that the objective is to provide impartial process in dealing with harassment and sexual harassment. Mentioned also</p>	Complied

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	that the company is committed to promote safe and healthy work environment which free form unlawful discrimination.	
<p><b>4.4.5.13</b> The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>IOI Group established Equal Opportunity Employment and Freedom of Association Policies signed by N B Sudhakaran, Plantation Director dated 01/10/2017.</p> <p>Document review on the policy describes management will ensure workers will be received equal treatment based on relevant merits and competency regardless of gender, race, caste, nationality, religion, physical condition, sexual orientation, marital status and others.</p> <p>Sighted also was the Collective Agreement signed between IOI Group of Companies and the National Union of Plantation Workers came into force on 01/01/2020 and valid until 31/12/2022.</p> <p>Onsite interview with workers informed they feedback that there is no prohibition to join any union and participate as member of NUPW. And they been briefed on the new collective agreement during NUPW meeting with the union officer.</p> <p>Kahang Estate, Swee Lam Estate and Mamor Estate conduct Internal Stakeholder meeting, Jawatankuasa Perundingan Pekerja and Women Committee (WEC) meeting to discuss on social issues related to workers benefit, welfare, women empowerment activities and housing matters as below:</p> <ol style="list-style-type: none"> <li>1. Kahang Estate conduct Internal Stakeholder meeting on 05/10/2022, Jawatankuasa Perundingan Pekerja on 20/10/2022 and WEC meeting on 13/04/2022.</li> <li>2. Swee Lam Estate conduct Jawatankuasa Perundingan Pekerja on 13/10/2022 and WEC meeting on 22/09/2022.</li> <li>3. Mamor Estate conduct Jawatankuasa Perundingan Pekerja on</li> </ol>	<p>Complied</p>

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		29/09/2022 and WEC meeting on 24/12/2022. Onsite interview with workers from Kahang Estate, Swee Lam Estate and Mamor Estate inform they does understand that management does not discriminate or retaliate against union members.	
<b>4.4.5.14</b>	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 exposed to hazardous working conditions. <b>- Major compliance -</b>	IOI Group established Sustainable Oil Palm Policy includes protection for children signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer and Dr Surina Ismail, Group Head of Sustainability dated 01/10/2020. Document review, the policy state in Paragraph 4 describes that IOI Group would eliminate all forms of child labour. Document review on employee master and onsite interview with workers informed they are no children working in the estate with age less than 18 years old.	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	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. <b>- Major compliance -</b>	Training was planned and conducted and Training Plan established as sampled in Kahang Estate and record of training conducted maintained as below: <ul style="list-style-type: none"> <li>• ERT training was conducted on 07/11/2022 and attended by 11 workers (Mandores and staff).</li> <li>• First Aider training was conducted on 07/11/2022 attended by 9 workers (mandores, Asst Manager and Cadet Assistant).</li> <li>• Safe Chemical Handling Training was conducted on 07/10/2022 and as recorded found attended by mandore and two Sprayers.</li> </ul>	Complied

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	<p>While in Swee Lam Estate similar Training Programme established and Training Plan 2022 available. Implementation of training with records as sampled:</p> <ul style="list-style-type: none"> <li>• Safe Tractor Driving Training was conducted on 26/01/2022 and attended by 17 Tractor Drivers.</li> <li>• Chemical Handling Training was conducted on 29/07/2022 and attended by 3 Sprayers.</li> <li>• First Aid Training was conducted on 22/06/2022 and attended by 18 Harvesters, Checker and Mandore during Master Call.</li> <li>• First Aid and CPR Training was conducted on 23/01/2022 at amol Club House and attended by Sustainability Clerk, MA.</li> </ul> <p>Finally in Mamor Estate, record of training conducted from Training Plan 2022 available and kept:</p> <ul style="list-style-type: none"> <li>• First Aid and CPR Training was attended by 3 staff on 22-23/01/2022 at PAMOL Club House.</li> <li>• Chemical Spraying SOP Training was conducted on 19/05/2022 and attended by 7 Sprayers, Tractor Driver and Mandore.</li> <li>• Fire Drill Training was conducted on 05/09/2022 and attended by 4 staff (Agronomist, Cadet Assistant, Field Staff and Res Operator).</li> <li>• Tractor Driving SOP Training was conducted on 14/09/2022 and attended by 12 Tractor Drivers.</li> <li>• Emergency Response Plan Briefing was conducted on 10/10/2022 and attended by 7 Mandores/Checkers.</li> <li>• Training on Grabber System was conducted on 14/09/2022 and attended by 12 Tractor Driver.</li> </ul>	

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		<ul style="list-style-type: none"> <li>• ERP Training was conducted on 29/09/2022 and attended by 10 Asst. Managers, Cadet Asst, Fields Staff, Sustainability Staff.</li> </ul>	
<b>4.4.6.2</b>	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. <b>- Major compliance -</b>	Available Recommended Training Needs (Appendix D) established and documented at all estates (Kahang, Swee Lam and Mamor) covering positions of staff from Estate Manager, Assistant Manager, Staff, Clerk, Mandore, Sprayer, harvesters, Manurers and ect. Types of training found clearly listed for each of them to provide the specific skill and competency required to all employees.	Complied
<b>4.4.6.3</b>	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. <b>- Minor compliance -</b>	Continuous Training included operational SOP trainings in all estates (Kahang, Swee Lam and Mamor) recommended throughout the year as in Frequency Training Needs document where training will be conducted monthly, quarterly, half-yearly, yearly or when required. The frequency clearly stated in a matrix format for related personnel and types of training needed.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. <b>- Major compliance -</b>	Environmental Policy was address in IOI Group Sustainable Palm Oil Policy under section Environmental Management dated 2020 signed by the Group Managing Director and Chief Executive Officer. The policy was communicated to the employee through displayed at notice board around the mill, training and morning briefing.	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.	The operating units have conducted the aspects and impacts analysis and documented in the Environmental Risk Assessment from. The analysis was reviewed on annually basis. Latest review was conducted	Complied

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	- Major compliance -	in 17/11/2022 for Kahang Estate, 12/10/2022 for Swee Lam Estate and 10/11/2022 Mamor Estate. Based on the environmental aspects impacts conducted, the estates established action plan documented in the Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme.	
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 -	Based on the environmental aspects impacts conducted, the Estates established action plan documented in the Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme. Reviewed the implementation of the management plan as follows: <u>Kahang Estate</u> 1. The estate has construct oil trap to prevent any leakage of diesel/ lubricants going to waterways. Reviewed the oil trap monitoring and cleaning records dated 05/10/2022, 26/10/2022, 03/11/2022 and 17/11/2022. 2. The estate monitor the diesel and electricity consumption on monthly basis. Reviewed the records for periods of July 2021 – June 2022. The diesel usage recorded at 4.48 L/ton FFB produced while electricity usage recorded at 2.60 kWh/ FFB produced. <u>Swee Lam Estate</u> 1. The estates conduct vehicle repair and maintenance on timely basis and maintain the records of to ensure all vehicle working in good condition, optimize usage of fuel. Reviewed the records of maintenance as per Field Service Repair Report no. KLG 06561 for vehicle no. WRT 4765, no. KLG 06562 for vehicle no. WUF 9374 and no. KLG 06563 dated 07/11/2022	Complied

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		<p>2. The estate has construct oil trap to prevent any leakage of diesel/lubricants going to waterways. Reviewed the oil trap monitoring and cleaning records dated 03/11/2022 and 18/11/2022. Noted during site visit at the workshop, the oil trap condition was in order.</p> <p><u>Mamor Estate</u></p> <p>1. The estate has established buffer zone for natural water stream flow through the estate named R1, R2 and R3. The buffer zone were demarcated with red colour ring at the palms trunk along the buffer zone area. Sighted during site visit, the estate has erected signage on prohibition of chemical application, hunting, fishing and cutting down trees at the area. No evidence of chemical application and the vegetation were well growth.</p> <p>2. The estate has construct oil trap to prevent any leakage of diesel/lubricants going to waterways. Reviewed the oil trap monitoring and cleaning records dated 03/11/2022 and 16/11/2022. Noted during site visit at the workshop, the oil trap condition was in order.</p> <p>3. The estate conduct vehicle repair and maintenance on timely basis and maintain the records of to ensure all vehicle working in good condition, optimize usage of fuel. Reviewed the records of maintenance as per Delivery Order no. KDO2209265 for vehicle no JUM 846 and KDO2209266 for vehicle no. JUM 8456 dated 26/09/2022.</p>	
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>Program to promote the positive impacts was documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme. Among the programme to promote positive impact implemented as follows:</p>	Complied



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		<ol style="list-style-type: none"> <li>1. The estate has established recycle waste collection centre at the line site area. Reviewed the records of recycle waste sold and collected as follows per official receipt dated 07/06/2022 and 12/02/2022 at Kahang Estate, no. 85422 and 88995 dated 18/09/2022 at Swee lam Estate and no. 35576 dated 03/09/2022, 35577 and 35578 dated 24/09/2022 and 35581 dated 08/11/2022 for Mamor Estate.</li> <li>2. The estate continuously promote the 3R (reduce, reuse and recycle) program to the workers. reviewed the training records for Waste segregation training dated 15/11/2022 for Kahang Estate, 25/05/2022 for Swee lam Estate and 03/09/2022 for Mamor Estate.</li> <li>3. The conserve soil moisture at the mature and replanting area, the estate applied EFB at the field. Reviewed the EFB application records for Mamor Estate as at todate FY 2022 for P97D recorded at 673.94 ton.</li> <li>4. The estates sampled continuously conducted "Gotong – Royong" to ensure the cleanliness at the line site area. Reviewed the "Gotong – Royong" report conducted on 15/10/2022 at Mamor Estate.</li> </ol>	
<b>4.5.1.5</b>	<p>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><b>- Major compliance -</b></p>	<p>The estates continuously provided training to the employee to ensure the understanding on the environmental policy, objectives and management plans. Noted during interview, the understanding on the environmental issue were acceptable.</p> <p>Reviewed the sampled training materials and attendance for training conducted as follows:</p> <p><u>Kahang Estate</u></p> <ol style="list-style-type: none"> <li>1. Oil trap maintenance training dated 04/11/2022</li> </ol>	Complied

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		2. Waste segregation training dated 15/11/2022 3. Bufferzone area for sprayers training dated 15/10/2022 4. Wildlife training dated 19/08/2022 <u>Swee Lam Estate</u> 1. Riparian Buffer zone training dated 07/04/2022, 22/06/2022, 15/07/2022 2. Water quality index training dated 18/10/2022 3. Wildlife training dated 25/05/2022 4. HCV Management training dated 16/06/2022 5. Waste segregation and management training dated 25/05/2022 6. Oil trap maintenance training dated 23/06/2022 <u>Mamor Estate</u> 1. Empty chemical container triple rinse training dated 30/06/2022 2. RTE and wildlife training dated 29/09/2022 3. Oil trap maintenance training dated 28/06/2022 4. Riparian Buffer zone training dated 15/06/2022, 06/04/2022 5. Waste segregation training dated 03/09/2022													
<b>4.5.1.6</b>	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. <b>- Major compliance -</b>	The estate has established Environmental Performance Monitoring Committee. The committee meeting was conducted on quarterly basis. Reviewed the latest 2 minutes meeting conducted as follows: <table border="1" style="margin-left: 20px;"> <tr> <td>Estate</td> <td>02/2022</td> <td>03/2022</td> </tr> <tr> <td>Kahang Estate</td> <td>27/06/2022</td> <td>13/09/2022</td> </tr> <tr> <td>Swee Lam Estate</td> <td>09/06/2022</td> <td>02/09/2022</td> </tr> <tr> <td>Mamor Estate</td> <td>17/06/2022</td> <td>29/09/2022</td> </tr> </table>	Estate	02/2022	03/2022	Kahang Estate	27/06/2022	13/09/2022	Swee Lam Estate	09/06/2022	02/09/2022	Mamor Estate	17/06/2022	29/09/2022	Complied
Estate	02/2022	03/2022													
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Mamor Estate	17/06/2022	29/09/2022													

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Criterion / Indicator		Assessment Findings	Compliance												
		Among the issue discussed in the meeting such as GHG reduction, waste disposal, riparian reserve area, RTE species and wildlife, HCV area monitoring, water management, zero burning, linesite cleanliness, rain water harvesting and other issues.													
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>															
<b>4.5.2.1</b>	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. <b>- Major compliance -</b>	<p>The operating units has established plan for efficiency of the use of fossil fuels documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme under section 2.0 Identification and Management Plan of Potential Pollutants Source and Potential Source of GHG Emission. Reviewed the implementation of the management as follows:</p> <ol style="list-style-type: none"> <li>The estates monitor the diesel and electricity consumption on monthly basis. Reviewed the records for periods of July 2021 – June 2022. The diesel usage recorded as follows: <table border="1" data-bbox="1093 962 1865 1129"> <thead> <tr> <th>Estate</th> <th>Diesel (L/ ton FFB)</th> <th>Electricity (kWh/ ton FFB)</th> </tr> </thead> <tbody> <tr> <td>Kahang Estate</td> <td>4.48</td> <td>2.60</td> </tr> <tr> <td>Swee Lam Estate</td> <td>3.40</td> <td>6.07</td> </tr> <tr> <td>Mamor Estate</td> <td>1.79</td> <td>5.16</td> </tr> </tbody> </table> </li> <li>The estates conduct vehicle repair and maintenance on timely basis and maintain the records of to ensure all vehicle working in good condition, optimize usage of fuel. Reviewed the records of maintenance as follows:  <u>Kahang Estate</u></li> </ol>	Estate	Diesel (L/ ton FFB)	Electricity (kWh/ ton FFB)	Kahang Estate	4.48	2.60	Swee Lam Estate	3.40	6.07	Mamor Estate	1.79	5.16	Complied
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		<p>Delivery Order no. KDO2209238 dated 23/09/2022 for vehicle no JVM 8467 and KDO2209237 dated 23/09/2022 for vehicle no. JVM 8463.</p> <p><u>Swee Lam Estate</u></p> <p>Field Service Repair Report no. KLG 06561 for vehicle no. WRT 4765, no. KLG 06562 for vehicle no. WUF 9374 and no. KLG 06563 dated 07/11/2022.</p> <p><u>Mamor Estate</u></p> <p>Delivery Order no. KDO2209265 for vehicle no JUM 846 and KDO2209266 for vehicle no. JUM 8456 dated 26/09/2022.</p>	
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>The estates has established baseline for diesel usage base on 3 years diesel consumption trend. The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations.</p>	Complied
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	<p>The estates used solar powered street lights along the main road as sighted in Swee lam Estate.</p> <p>No other possibility of renewable energy used in the estates visited.</p>	Complied
<b>Criterion 4.5.3: Waste management and disposal</b>			
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>The operating units has identified the waste generated from the mill operation. A management plan has been established based on the waste identified and documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme under section 1.0 Identification of Waste</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Products/Pollutants. The waste generated was categorised base on source of pollution as follows:</p> <ul style="list-style-type: none"> <li>1.1 Spent Oil/ Lubricants and Empty Chemical Containers</li> <li>1.2 Scheduled waste store</li> <li>1.3 Clinical waste</li> <li>1.4 Domestic and recyclable waste, scrap iron, construction waste, sewage and green residue</li> </ul>	
<b>4.5.3.2</b>	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> <li>a) Identifying and monitoring sources of waste and pollution</li> <li>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</li> </ul> <p><b>- Major compliance -</b></p>	<p>A management plan has been established based on the waste identified and documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme under section 1.0 Identification of Waste Products/Pollutants.</p> <p>Reviewed the implementation of the management plan as follows:</p> <p><u>Kahang Estate</u></p> <ul style="list-style-type: none"> <li>1. The estate continuously promote the 3R (reduce, reuse and recycle) program to the workers. reviewed the training records for Waste segregation training dated 15/11/2022</li> <li>2. The estate has established recycle waste collection centre at the line site area. Reviewed the records of recycle waste sold and collected as per official receipt dated 07/06/2022 and 12/02/2022.</li> <li>3. Domestic waste were collected 2 times a week at waste bin located away from the housing area before being transported and disposed at Municipal landfill by contractors. The appointed contractors, Sinar YSM Enterprise will transport the BIN to municipal landfill. Reviewed the records as per weighbridge ticket no 1994 dated 02/09/2022 and 2005 dated 12/09/2022.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> <li>1. The estates sampled maintain the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of August, September and October 2022.</li> <li>2. Wastewater from premixing chemical activities were collected in collection sump and reused back for premixing chemicals as sighted at the chemical mixing area.</li> </ol> <p><u>Mamor Estate</u></p> <ol style="list-style-type: none"> <li>1. The conserve soil moisture at the mature and replanting area, the estate used the mill by-product such as EFB for field application as part of waste recycle program. Reviewed the EFB application records as at todate FY 2022 for P97D recorded at 673.94 ton.</li> <li>2. Wastewater from premixing chemical activities were collected in collection sump and reused back for premixing chemicals as sighted at the chemical mixing area.</li> <li>3. The estate continuously promote the 3R (reduce, reuse and recycle) program to the workers. Reviewed the training records for Waste segregation training dated 03/09/2022.</li> </ol>	
<p><b>4.5.3.3</b></p>	<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><b>- Major compliance -</b></p>	<p>Procedure for handling of scheduled waste was addressed in Safe Operating Procedure, Scheduled Waste Procedure. Refer document ref. no. IOI-OSH 3.2.2, rev. no. 1, Appendix 12 (English) dated 22/05/2020.</p> <p>Scheduled waste generated were stored in designated places until the time of disposal. The store was under lock and key. Stores for scheduled waste were inspected and disposal was done by scheduled</p>	<p>Complied</p>

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		<p>waste disposal company authorized and licensed by Department of Environment.</p> <p>The estates sampled maintain the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of August, September and October 2022.</p> <p>The scheduled waste was disposed through licensed operator, Kualiti Alam Sdn. Bhd. Reviewed the disposal records as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Date</th> <th>SW</th> <th>Consignment note no</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Kahang Estate</td> <td rowspan="6">05/09/2022</td> <td>312</td> <td>20220905128N74FI</td> </tr> <tr> <td>305</td> <td>2022090512GIYHPW</td> </tr> <tr> <td>109</td> <td>2022090512GXY4TO</td> </tr> <tr> <td>104</td> <td>2022090512MD2H8U</td> </tr> <tr> <td>110</td> <td>2022090512RF4JCH</td> </tr> <tr> <td>410</td> <td>2022090512UK4ECD</td> </tr> <tr> <td rowspan="6">Swee Lam Estate</td> <td rowspan="4">03/08/2022</td> <td>312</td> <td>2022080312KTDOQ4</td> </tr> <tr> <td>410</td> <td>202208031265YT72</td> </tr> <tr> <td></td> <td>2022080312H0QNMI</td> </tr> <tr> <td>305</td> <td>2022080312G1ZLXS</td> </tr> <tr> <td>429</td> <td>2022080312I5ABLX</td> </tr> <tr> <td>20/07/2022</td> <td>404</td> <td>164251</td> </tr> <tr> <td>27/09/2022</td> <td>404</td> <td>172453</td> </tr> <tr> <td rowspan="5">Mamor Estate</td> <td>21/11/2022</td> <td>404</td> <td>2022112111IOGJH2</td> </tr> <tr> <td rowspan="4">12/09/2022</td> <td>104</td> <td>2122091308QO9BCN</td> </tr> <tr> <td>110</td> <td>20220913080IG1U2</td> </tr> <tr> <td>305</td> <td>2022091308XCAEH</td> </tr> <tr> <td>312</td> <td>20220913082MGFRL</td> </tr> <tr> <td>410</td> <td>20220913086FEMD1</td> </tr> </tbody> </table>				Date	Date	SW	Consignment note no	Kahang Estate	05/09/2022	312	20220905128N74FI	305	2022090512GIYHPW	109	2022090512GXY4TO	104	2022090512MD2H8U	110	2022090512RF4JCH	410	2022090512UK4ECD	Swee Lam Estate	03/08/2022	312	2022080312KTDOQ4	410	202208031265YT72		2022080312H0QNMI	305	2022080312G1ZLXS	429	2022080312I5ABLX	20/07/2022	404	164251	27/09/2022	404	172453	Mamor Estate	21/11/2022	404	2022112111IOGJH2	12/09/2022	104	2122091308QO9BCN	110	20220913080IG1U2	305	2022091308XCAEH	312	20220913082MGFRL	410	20220913086FEMD1	
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4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>The estates continuously conducted training to ensure the workers understand and able to conduct triple rinse for empty chemical containers. Reviewed the training records for triple rinse conducted on 19/10/2022 at Kahang Estate, 12/01/2022 at Swee Lam Estate and 30/06/2022 at Mamor Estate.</p> <p>The estates kept the inventory of the triple rinsed chemical containers and reported to DOE through ESWISS as SW 409. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of August, September and October 2022.</p> <p>The triple rinsed chemical containers were stored in designated storage area under lock and key before disposed through licensed contractors, Kualiti Alam Sdn. Bhd. reviewed the disposal records as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Consignment note no</th> </tr> </thead> <tbody> <tr> <td>Kahang Estate</td> <td>05/09/2022</td> <td>2022090512GXY4TO</td> </tr> <tr> <td>Swee Lam Estate</td> <td>03/08/2022</td> <td>20220803123RUK5N</td> </tr> <tr> <td>Mamor Estate</td> <td>13/09/2022</td> <td>2022091308HFXL9S</td> </tr> </tbody> </table>	Estate	Date	Consignment note no	Kahang Estate	05/09/2022	2022090512GXY4TO	Swee Lam Estate	03/08/2022	20220803123RUK5N	Mamor Estate	13/09/2022	2022091308HFXL9S	Complied
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4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>For Kahang Estate and Mamor Estate, Domestic waste were collected 2 times a week at waste bin located away from the housing area before being transported and disposed at Municipal landfill by contractors. The appointed contractors, Sinar YSM Enterprise will transport the BIN to municipal landfill.</p> <p>For Swee Lam Estate, the domestic waste were collected and disposed by the municipal appointed contractors.</p>	Complied												
<p><b>Criterion 4.5.4:</b> Reduction of pollution and emission</p>															



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<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	The estates sampled has conducted assessment of all polluting activities during aspects and impacts analysis and documented in the Environmental Risk Assessment from. The analysis was reviewed on annually basis. Latest review was conducted in 17/11/2022 for Kahang Estate, 12/10/2022 for Swee Lam Estate and 10/11/2022 Mamor Estate.	Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	The operating units has established plan for efficiency of the use of fossil fuels documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme under section 2.0 Identification and Management Plan of Potential Pollutants Source and Potential Source of GHG Emission. Reviewed the implementation of the management as follows: <ol style="list-style-type: none"> <li>1. The estates sampled has construct collection sump/containers at the premix area. The waste water from premix activities were recollect and reuse back for chemical premixing.</li> <li>2. The estates conduct vehicle repair and maintenance on timely basis and maintain the records of to ensure all vehicle working in good condition, optimize usage of fuel. The records of repair and maintenance were available at the sampled estates for review.</li> </ol>	Complied
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	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.	The estates sampled has established Water Management Plan FY 2022. Latest review was conducted on 17/11/2022 for Kahang Estate, 18/11/2022 for Swee Lam Estate and 10/11/2022 for Mamor Estate. The plan focusing on conservation of water pond and water treatment plan, drinking water analysis and stream water quality analysis. Reviewed the implementation of the management plan as follows:	Complied

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<p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</p> <p>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.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<p><u>Kahang Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate conducted river water sampling for natural water stream flow through the estate named R1 and R2 once a year. Latest water sampling FY 2022 was conducted on 25/08/2022. Refer report titled Kahang Estate 19<sup>th</sup> Water Sampling. As per report in Table 4 and analysis certificate no. W0822/040 AKH-1, W0822/041 AKH-2, W0822/042 AKH-3, W0822/043 BKH-1 and W0822/044 BKH-2, the results were within Class III of the National Water Quality Standards of Malaysia.</li> <li>2. The estate monitor the water usage on monthly basis. Reviewed the water consumption records FY 2021 and FY 2022 as to-dated October recorded at 29137m<sup>3</sup> and 23064 m<sup>3</sup> respectively.</li> <li>3. The estate conducted domestic water sampling twice a year. Reviewed the latest sampling records as per lab report no. LS/W/K9864/22 dated 07/07/2022. The results was conform to National Standards for Drinking Water Quality, 2nd Version, January 2004.</li> </ol> <p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate conducted river water sampling for natural water stream flow through the estate named R1, R2 and R3 once a year. Latest water sampling FY 2022 was conducted on 03/08/2022. Refer report titled Swee Lam Estate 20<sup>th</sup> Water Sampling. As per report in Table 4, the results were within Class II of the National Water Quality Standards of Malaysia</li> <li>2. The estate conducted domestic water sampling twice a year. Reviewed the latest sampling records as per report no.</li> </ol>	

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	<p>ENV/WATER/SWEE LAM/04.22 dated April 2022. The results was conform to National Standards for Drinking Water Quality, 2nd Version, January 2004.</p> <p>3. The estates monitor the rainfall in the estate on monthly basis. Reviewed the monthly rainfall report as to-date October 2022.</p> <p><u>Mamor Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate conducted river water sampling for natural water stream flow through the estate named R1, R2 and R3 once a year. Latest water sampling FY 2022 was conducted on 15/07/2022. Refer report titled Mamor Estate 20<sup>th</sup> Water Sampling. The results were within Class II and III of the National Water Quality Standards of Malaysia.</li> <li>2. The estate conducted domestic water sampling twice a year. Reviewed the latest sampling records as per lab report no. LS/W/K6032/22 dated 04/03/2022 and LS/W/K9863/22 dated 07/07/2022. The results were the results was conform to National Standards for Drinking Water Quality, 2nd Version, January 2004.</li> <li>3. To conserve soil moisture of rolling and hill area, the estate construct conservation terrace with back drop of 0.6 – 0.7 meter to hold water as sighted during site visit at PR22.</li> <li>4. The conserve soil moisture at the mature and replanting area, the estate applied EFB at the field. Reviewed the EFB application records as at todate FY 2022 for P97D recorded at 673.94 ton.</li> </ol> <p>The estates sampled has also established buffer zone at the water pond area. The buffer zone were clearly demarcated with red colour</p>	

Criterion / Indicator		Assessment Findings	Compliance
		ring at palm trunks. No evidence of chemical application along the buffer zone area. The estates sampled has erected signage on prohibition of chemical spraying, fertiliser application, cutting down trees, open burning, fishing/poisoning fish and hunting at the buffer zone area.	
<b>4.5.5.2</b>	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. <b>- Minor compliance -</b>	Sighted during field visit in all estates visited, no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Complied
<b>4.5.5.3</b>	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). <b>- Minor compliance -</b>	The estates has placed container for rain harvesting at the workshop and store area. The water were used for cleaning and watering landscape plant. The estates also constructed silt pit and road side drain to channel and captured the water in the estate field.	Complied
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	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: 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),	The estates sampled has conducted initial High Conservation Value and conservation area and biodiversity assessment for all estates in 2009. Based on the HCV and Conservation area identified, the estates has established management plan. The Sustainability Department has reviewed the report and the and management plan and documented in report as follows: 1. High Conservation Value (HCV) & Conservation Area Assessment and Management Action Plans (Review Document), Kahang Estate, dated 17/11/2022.	Complied

Criterion / Indicator		Assessment Findings	Compliance																									
	<p>that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>	<p>2. High Conservation Value (HCV) &amp; Conservation Area Assessment and Management Action Plans (Review Document), Swee Lam Estate, dated 10/11/2022.</p> <p>3. High Conservation Value (HCV) &amp; Conservation Area Assessment and Management Action Plans (Review Document), Mamor Estate, dated 17/11/2022.</p>																										
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>As per High Conservation Value and conservation area and biodiversity assessment conducted, the identified HCV and conservation area as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Area</th> <th>HCV/ Conservation Area</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Kahang Estate</td> <td>Natural Water Stream R1</td> <td>HCV 4</td> </tr> <tr> <td>Natural Water Stream R2</td> <td>HCV 4</td> </tr> <tr> <td>Riparian reserve for Natural Water Stream R1</td> <td>Conservation Area</td> </tr> <tr> <td>Riparian reserve for Natural Water Stream R1</td> <td>Conservation Area</td> </tr> <tr> <td>Pond</td> <td>Conservation Area</td> </tr> <tr> <td rowspan="5">Swee Lam Estate</td> <td>Natural Water Stream R1</td> <td>HCV 4</td> </tr> <tr> <td>Natural Water Stream R2</td> <td>HCV 4</td> </tr> <tr> <td>Natural Water Stream R3</td> <td>HCV 4</td> </tr> <tr> <td>Riparian reserve for Natural Water Stream R1</td> <td>Conservation Area</td> </tr> <tr> <td>Riparian reserve for Natural Water Stream R2</td> <td>Conservation Area</td> </tr> </tbody> </table>	Estate	Area	HCV/ Conservation Area	Kahang Estate	Natural Water Stream R1	HCV 4	Natural Water Stream R2	HCV 4	Riparian reserve for Natural Water Stream R1	Conservation Area	Riparian reserve for Natural Water Stream R1	Conservation Area	Pond	Conservation Area	Swee Lam Estate	Natural Water Stream R1	HCV 4	Natural Water Stream R2	HCV 4	Natural Water Stream R3	HCV 4	Riparian reserve for Natural Water Stream R1	Conservation Area	Riparian reserve for Natural Water Stream R2	Conservation Area	Complied
Estate	Area	HCV/ Conservation Area																										
Kahang Estate	Natural Water Stream R1	HCV 4																										
	Natural Water Stream R2	HCV 4																										
	Riparian reserve for Natural Water Stream R1	Conservation Area																										
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	Pond	Conservation Area																										
Swee Lam Estate	Natural Water Stream R1	HCV 4																										
	Natural Water Stream R2	HCV 4																										
	Natural Water Stream R3	HCV 4																										
	Riparian reserve for Natural Water Stream R1	Conservation Area																										
	Riparian reserve for Natural Water Stream R2	Conservation Area																										

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Criterion / Indicator		Assessment Findings		Compliance
			Riparian reserve for Natural Water Stream R3 Pond	Conservation Area Conservation Area
		Mamor Estate	Natural Water Stream R1 Natural Water Stream R2 Natural Water Stream R3 Steep Slope >25° Riparian reserve for Natural Water Stream R1 Riparian reserve for Natural Water Stream R2 Riparian reserve for Natural Water Stream R3 Pond	HCV 4 HCV 4 HCV 4 HCV 4 Conservation Area Conservation Area Conservation Area Conservation Area
		<p>The estates has erected signage on prohibition of chemical spraying, fertiliser application, cutting down trees, open burning, fishing/poisoning fish, disposed toxic waste, hunting at the HCV area and other strategic places such as muster ground, office area and housing area.</p> <p>The estate continuously conducted training for all workers to ensure their awareness on HCV area and biodiversity in the estate. Reviewed the training material and attendance records as follows:</p> <p><u>Kahang Estate</u></p> <ol style="list-style-type: none"> <li>Riparian Buffer zone area for sprayers training dated 15/10/2022</li> </ol>		

Criterion / Indicator		Assessment Findings	Compliance
		2. Wildlife training dated 19/08/2022  <u>Swee Lam Estate</u> 1. Riparian Buffer zone training dated 07/04/2022, 22/06/2022, 15/07/2022 2. Water quality index training dated 18/10/2022 3. Wildlife training dated 25/05/2022 4. HCV Management training dated 16/06/2022  <u>Mamor Estate</u> 1. RTE and wildlife training dated 29/09/2022 2. Riparian Buffer zone training dated 15/06/2022, 06/04/2022	
<b>4.5.6.3</b>	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. <b>- Major compliance -</b>	Based on the HCV and Conservation area identified, the estates has established management plan. The Sustainability Department has reviewed the management plan on annually basis. latest reviewed was conducted on 17/11/2022  Reviewed the implementation of the management plan as follows: <u>Kahang Estate</u> 1. The estate has established riparian buffer zone for natural water stream flow through the estate named R1 and R2. Sighted during site visit at buffer zone at field PM01B and PM06A. No evidence of chemical application at the buffer zone area. 2. The estate conducted river water sampling for natural water stream flow through the estate named R1 and R2 once a year. Latest water sampling FY 2022 was conducted on 25/08/2022. Refer report titled Kahang Estate 19 <sup>th</sup> Water Sampling. As per	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>report in Tale 4 and analysis certificate no. W0822/040 AKH-1, W0822/041 AKH-2, W0822/042 AKH-3, W0822/043 BKH-1 and W0822/044 BKH-2, the results were within Class III of the National Water Quality Standards of Malaysia.</p> <ol style="list-style-type: none"> <li>3. The estate conducted HCV monitoring/patrolling on monthly basis. Reviewed the monitoring records dated 26/10/2022, 28/09/2022 and 26/08/2022.</li> <li>4. The estate recorded animal/ trace of animal sighted in the estate. Reviewed the animal sighting records for the month August, September and October 2022. Among the animal sighted in the estate such as monitor lizard, barn owl, fox, stork, snakes and elephant.</li> <li>5. If there is any wildlife encroachment such as elephant occur in the estate, the estate lodge report to the Wildlife Department as reviewed letter and communication email dated 19/10/2022.</li> </ol> <p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate conducted HCV monitoring on monthly basis. Reviewed the monitoring records for monitoring at natural water stream R1 (P92A), R2 P14E), and R3 (P00A) dated 18/11/2022, 21/10/2022, and 21/09/2022.</li> <li>2. The estate maintain the records of animal sighted in the estate in RTE Species monitoring checklist. Reviewed the records for month of September and October 2022. Among the animal sighted in the estate such as python, terrapin, porcupine, monkey, wild boar and jungle fowl.</li> <li>3. The estate has established buffer zone for natural water stream flow through the estate named R1, R2 and R3. . Sighted during site</li> </ol>	



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		<p>visit at buffer zone at field PM07C and PM14E. No evidence of chemical application at the buffer zone area.</p> <p><u>Mamor Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate conducted HCV monitoring on monthly basis. Reviewed the monitoring records for HCV monitoring in Monitoring Checklist – Buffer Zone, Worshipping Area and Steep Hill for the month of September, October and November 2022.</li> <li>2. The estate maintain the records of animal sighted in the estate in RTE Species monitoring checklist. Reviewed the records for month of September and October 2022. Among the animal sighted in the estate such as python, monitor lizard, wild boar and jungle fowl.</li> <li>3. The estate conducted river water sampling for natural water stream flow through the estate named R1, R2 and R3 once a year. Latest water sampling FY 2022 was conducted on 15/07/2022. Refer report titled Mamor Estate 20<sup>th</sup> Water Sampling. The results were within Class II and III of the National Water Quality Standards of Malaysia</li> </ol>	
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	<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><b>- Major compliance -</b></p>	<p>IOI Plantation has established Zero Burning Policy Signed by the Plantation Director dated May 2018.</p> <p>For new planting and replanting land preparation, IOI Plantations has established Standard Operating Procedure for Estate Operation as follows:</p>	Complied

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		1. Standard Operating Procedure for Land Clearing for Oil Palm Cultivation, document no. IOI/SOP/A/04, issue date 2007, revised date March 2020. 2. Standard Operating Procedure for Land Preparation for New Planting and Replanting, document no. IOI/SOP/A/05, issue date 2007, revised date March 2020. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	
<b>4.5.7.2</b>	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. <b>- Major compliance -</b>	The management maintained zero open burning and opted for other option in case of potential significant risk of disease spread for the continuation of other crop. Hence this requirement is not used in the estate practices.	Not applicable
<b>4.5.7.3</b>	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. <b>- Major compliance -</b>	The management maintained zero open burning and opted for other option in case of potential significant risk of disease spread for the continuation of other crop. Hence this requirement is not used in the estate practices.	Not applicable
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	No evidence of fire use for replanting waste disposal. As per replanting procedure established, the old palms were felled, shredded, windrowed and left to decompose as sighted in field P2022 at estates visit ed.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			

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4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	<p>Found as sampled a document of Standard Operation Procedures for estates recently revised and maintained. Set of SOP for estate operations detailed out under Group Standard Operating Procedures for palm oil estates, document no IOI/SOP/A, dated on 01/07/2017 Revised March 2020. Sighted the SOP as below in Kahang, Swee Lam, Mamor Estates:</p> <ul style="list-style-type: none"> <li>• Planting density</li> <li>• Nursery</li> <li>• Land clearing &amp; preparation</li> <li>• Planting techniques</li> <li>• Tidal gates</li> <li>• Manuring</li> <li>• Pest &amp; Disease</li> <li>• Harvesting</li> <li>• Weeding</li> <li>• Road maintenance</li> <li>• Workshop</li> <li>• Buffalo healthcare</li> <li>• Foliar sampling &amp; soil sampling</li> <li>• Management and Monitoring of Existing Cultivation of Palm Oil on Peat.</li> </ul>	Complied
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	IOI Plantation in SOP established and documented titled SOP for Land Preparation for New Planting and Replanting (IOI/SOP/A/05) Revised March 2020 explained method for soil conservation measures to maintain slopes, erosion, and drainage and water runoff. Planting of	Complied

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	contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. <b>- Major compliance -</b>	cover crop are made to retain the soil structure and conservation of soil structure in all estates (Kahang, Swee Lam and Mamor).																									
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field. <b>- Major compliance -</b>	Sighted in the estate during site visit a visual identification and block marking posted in the visited field in Kahang, Swee Lam and Mamor Estates.	Complied																								
<b>Criterion 4.6.2: Economic and financial viability plan</b>																											
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Reviewed the annual budget FY 21/2022 and business plan FY 2021/22 – FY 2025/26.	Complied																								
<b>4.6.2.2</b>	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. <b>- Major compliance -</b>	The 10 years replanting program until 2031 were sighted on all the estates sampled in 5 years business plan. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows: <table border="1" data-bbox="1048 1034 1865 1270"> <thead> <tr> <th>Estate</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> </tr> </thead> <tbody> <tr> <td>Kahang Estate</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Swee Lam Estate</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Mamor Estate</td> <td>169.00</td> <td>187.00</td> <td>196.00</td> <td>190.00</td> <td>0.00</td> </tr> </tbody> </table>	Estate	2023/24	2024/25	2025/26	2026/27	2027/28	Kahang Estate	0.00	0.00	0.00	0.00	0.00	Swee Lam Estate	0.00	0.00	0.00	0.00	0.00	Mamor Estate	169.00	187.00	196.00	190.00	0.00	Complied
Estate	2023/24	2024/25	2025/26	2026/27	2027/28																						
Kahang Estate	0.00	0.00	0.00	0.00	0.00																						
Swee Lam Estate	0.00	0.00	0.00	0.00	0.00																						
Mamor Estate	169.00	187.00	196.00	190.00	0.00																						
<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB	Reviewed the annual budget FY 21/2022 and business plan FY 2021/22 – FY 2025/26 In the 5 years business plan include items as follows:	Complied																								

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	b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <b>- Major compliance -</b>	1. Area Statement (mature and immature) 2. Crop Statement by year of planting 3. Crop Statement monthly breakdown 4. 10 years replanting program 5. Summary replanting program by field 6. Detailed replanting program by field 7. Executive/ Staff and workers requirement 8. Mature oil palm costing statement 9. General charges statement 10. Capital expenditure statement	
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. <b>- Major compliance -</b>	The estates visited maintained all records of monitoring and available for review. The Estates submitted Monthly Progress Report to the Plantation Controller at the Regional Office. . The Plantation Controller (PC) is accountable to monitor the estates compliance towards the SOP, Budget and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC/CEO.	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	IOI Group established pricing mechanism has been documented in the contract agreement and contractors are explained on the terms of contracts prior to the signing of the contract. Sample has been taken by the auditor for verification as follows: 1. Sasaran Perentas Sdn Bhd, Transporting FFB contract no.: KHE/001-22/23 2. Sinar YSM Enterprise, Rubbish Collection contract no.: KHE/005-	Complied

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		<p>22/23</p> <p>3. RAPS Construction, Hiring JCB contract no.: SLE/005-22/23</p> <p>4. AVR Machinery Works and Enterprise, hired as loading and transport FFB to ramp contract no.: MME006-22/23</p>	
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>IOI Group ensure all contracts is fair, legal and transparent with their contractors by establishing binding contract agreement and signed by both parties.</p> <p>The pricing of task been briefed and agreed as describes in contract agreement with payments timeline terms.</p> <p>Document review, sample of contract agreement and payment has been taken for Kahang Estate as per below:</p> <p>1. Sasaran Perentas Sdn Bhd, Transporting FFB contract no.: KHE/001-22/23</p> <p>Payment term as stated in contract: 14 days after invoices received</p> <p>Payment Voucher: 7100000141, dated 11/11/2022</p> <p>Invoices number: 0036, PO No.: 45340558960, Dated: 31/10/2022</p> <p>Contractor name: Jayakumar Maju Jaya Enterprise</p> <p>2. Sinar YSM Enterprise, Rubbish Collection contract no.: KHE/005-22/23</p> <p>Payment Voucher: 7100000940, dated 28/10/2022</p> <p>Invoices number: 0036, PO No.: 45340558960, Dated: 31/10/2022</p> <p>Document review, sample of contract agreement and payment has been taken for Swee Lam Estate as per below:</p> <p>1. RAPS Construction, Hiring JCB contract no.: SLE/005-22/23</p> <p>Payment term as stated in contract: 14 days after invoices received</p>	Complied

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		<p>Payment Voucher: 7100000141, dated 11/11/2022            Invoices number: 0036, PO No.: 45340558960, Dated: 31/10/2022            Document review, sample of contract agreement and payment has been taken for Mamor Estate as per below:</p> <ol style="list-style-type: none"> <li>AVR Machinery Works and Enterprise, hired as loading and transport FFB to ramp contract no.: MME006-22/23              Payment term as stated in contract: 30 days after invoices received              Payment Voucher: 7100001470, dated 12/11/2022              Invoices number: 2022-033, PO No.: 4534060504, Dated: 31/10/2022</li> </ol>	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p><b>- Major compliance -</b></p>	<p>Prior signing the contract agreement, all contractors were required to read, understand and acknowledge as follows:</p> <ol style="list-style-type: none"> <li>Additional requirements for contractors and service provider, rev. no 03 dated 01/12/2020 Safety and Health Instruction for Contractors, or</li> <li>IOI's Supplier Code of conducts</li> <li>Safety and Health Instruction for Contractors</li> </ol> <p>IOI's Supplier Code of conducts and Additional requirements for contractors and service provider, rev. no 03 dated 01/12/2020, stated as follows:</p> <p>Contractors are to be aware and comply with all applicable local, national and ratified international laws and regulations including sustainability requirements (e.g. RSPO, RSPO Next, MSPO, ISCC, and etc.) including no child, forced and trafficked labour.</p>	Complied

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<p><b>4.6.4.2</b> The management shall provide evidence of agreed contracts with the contractor.  <b>- Major compliance -</b></p>	<p>The estates has prepared a standard contract for all the contractors. The signed copy of the contract available at the estate office.  Reviewed contract agreement as follows:  <u>Kahang Estate</u>  1. Contract Agreement, Perusahaan Mekassar (M) Sdn. Bhd. and Sinar YSM Enterprise (rubbish collector/transporter) dated 01/09/2022 refer contract no. KHE/005-22/23.  2. Contract Agreement, Perusahaan Mekassar (M) Sdn. Bhd. and Sasaran Perentas Sdn. Bhd. dated 01/09/2022, refer contract no. KHE/001-22/23.   <u>Swee Lam Estate</u>  1. Contract Agreement between IOI Plantations Services Sdn. Bhd and Sasaran Perentas Sdn. Bhd. dated 19/09/2022.  2. Contract Agreement between Nice Frontier Sdn. Bhd. and RAPS Construction, dated 01/07/2022. Refer contract no. SLE/004-22/23.   <u>Mamor Estate</u>  1. Contract Agreement between Pamol Plantations Sdn. Bhd. and Ah Teng Earthwork Construction Sdn. Bhd. dated 01/01/2022.  2. Contract Agreement between Pamol Plantations Sdn. Bhd. and Sinar YSM Enterprise (rubbish collector/transporter) dated 01/07/2022 refer contract no. MME003-22/23.</p>	<p>Complied</p>
<p><b>4.6.4.3</b> The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p>	<p>As stated in the Additional requirements for contractors and service provider, rev. no 03 dated 01/12/2020 under section 1 stated that the</p>	<p>Complied</p>



Criterion / Indicator		Assessment Findings	Compliance
	- <b>Minor compliance</b> -	company and its certification bodies have the right to audit the Contractor/Service provider.	
<b>4.6.4.4</b>	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.  - <b>Major compliance</b> -	All works performed at the estates are checked and verified by the estates personnel. All documentations were submitted to region office for approval before submitted to the Main Office for payment.	Complied
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
<b>4.7.1.1</b>	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.  - <b>Major compliance</b> -	No development of new planting within the certification units.	Not Applicable
<b>4.7.1.2</b>	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.  - <b>Major compliance</b> -	No development of new planting within the certification units.	Not Applicable
<b>Criterion 4.7.2: Peat Land</b>			

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<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
<b>4.7.3.1</b>	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
<b>4.7.3.2</b>	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. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
<b>4.7.3.3</b>	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
<b>4.7.3.4</b>	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. <b>- Minor compliance -</b>	No development of new planting within the certification units.	Not Applicable

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<b>Criterion 4.7.4:</b> Soil and topographic information			
<b>4.7.4.1</b>	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - <b>Major compliance</b> -	No development of new planting within the certification units.	Not Applicable
<b>4.7.4.2</b>	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - <b>Major compliance</b> -	No development of new planting within the certification units.	Not Applicable
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
<b>4.7.5.1</b>	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - <b>Major compliance</b> -	No development of new planting within the certification units.	Not Applicable
<b>4.7.5.2</b>	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. - <b>Major compliance</b> -	No development of new planting within the certification units.	Not Applicable
<b>4.7.5.3</b>	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - <b>Major compliance</b> -	No development of new planting within the certification units.	Not Applicable
<b>Criterion 4.7.6:</b> Customary land			

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.1	No new plantings are established on recognised customary land without the owners’ free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. <b>- Minor compliance -</b>	No development of new planting within the certification units.	Not Applicable
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
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. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.7.6.6</b>	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
<b>4.7.6.7</b>	The process and outcome of any compensation claims shall be documented and made publicly available. <b>- Major compliance -</b>	No development of new planting within the certification units.	Not Applicable
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	No development of new planting within the certification units.	Not Applicable

**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	IOI Group has established internal policy title Sustainable Palm Oil Policy in October 2020 that has been signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer and Dr Surina Ismail, Group Head of Sustainability.  Document review, the policy described management committed to comply with all applicable legislation and code of practices, to achieve higher level of transparency and stakeholder's engagement, to build traceable supply chain such that all suppliers are also in compliance with company commitment.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	IOI Group has established internal policy title Sustainable Palm Oil Policy in October 2020 that has been signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer and Dr Surina Ismail, Group Head of Sustainability.  Document review, the policy describes in clause 4 on the management committed towards sustainable production of palm oil and its continuous as outline in the MSPO guidelines.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	Internal Audit (MSPO LA Checklist Ver.03) was conducted for Pamol Kluang Palm Oil Mill on 27/10/2022 as reported by Muhamad Zulkarnain, Yusri Najmudin and Syaidatul Aishah (Auditor).	Complied

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	- <b>Major compliance</b> -	Available a checklist of audit with information and evidences of implementation and findings recorded.	
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengthen and root causes of nonconformities, in order to implement the necessary corrective action. - <b>Major compliance</b> -	Internal Audit Procedure has been established and documented in the document title "Internal audit" dated 03/05/2018 SOP 8. Findings of internal audit was investigated as sighted for Major NCR under 4.3.1.1 and 4.6.4.1. The Corrective Actions and Preventive Measures were proposed accordingly and dateline mentioned.	Complied
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. - <b>Major compliance</b> -	Result of Internal Audit being discussed and made available to Mill Manager as it was one of the discussion in the Management Review and Minutes sampled. Acting Mill Manager signed and endorsed the Minutes.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	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. - <b>Major compliance</b> -	Management Review was conducted as evidence of Minutes of Management Review on Sustainability for PAMOL Kluang Grouping held on 20/10/2022 at Meeting Room, PAMOL Clubhouse. Attended by Agos Atan (Sr. Manager Sustainability), Muhamad Zulkarnain b. Zubair Ahmadi (Asst Manager Sustainability), Rajan A/L Sinnathamby (Acting Mill Manager) Chua Seng Wei (Sr. Asst Mill Manager) and other Estates Managers and Assistants. Various issues discussed related to MSPO, internal audit results, mill performances, continual improvement, Complaints and grievances, Resources and training needs and etc.	Complied

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<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. <b>- Major compliance -</b>	IOI Services Sdn Bhd has produced Management Action Plan & Continuous Improvement Plan for PAMOL Kluang Palm Oil Moll Reviewed 17/11/2022. <ul style="list-style-type: none"> <li>• Waste fibre and shell produced are continually used as renewable energy sources in oil mill</li> <li>• Estate use EFB as mulch and support minimizing soil erosion, conserve soil moisture</li> <li>• Discharging POME for land application.</li> </ul>	Complied
<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. <b>- Major compliance -</b>	Pamol Mill as reported in Site Progress Report (November 2022) has installed Electrostatic Precipitator (ESP) dust collector system for 2 units 45 TPH Boiler. Currently civil work was completed at end of October 2022. Completion of installation of ESP Approximately in second week of January 2023.	Complied
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	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. <b>- Major compliance -</b>	IOI Group conduct external stakeholders meeting at Pamol Kluang POM dated 04/10/2022 attendee with 36 participants. Document review on minutes of meeting, management have brief on the list of documents that stakeholder can have access and request. Total of stakeholders attended by and using Bahasa Malaysia. The briefing includes process of documents to be accessed and location of Sustainability Corner display at each estate and mill office.	Complied



Criterion / Indicator		Assessment Findings	Compliance
		<p>Pamol Kluang POM adopt IOI Group's Stakeholder Request Procedure, SOP 12.0 and mill management individually update on 19/10/2022.</p> <p>The procedure describes the process and channel of external stakeholders request to respective estates level or corporate level by call at general line provided.</p>	
<b>4.2.1.2</b>	<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><b>- Major compliance -</b></p>	<p>IOI Group established Social Impact Assessment, Management Action Plans &amp; Continuous Improvement Plan which includes Stakeholder Request Procedure, SOP 12.0 and mill management individually update on 19/10/2022.</p> <p>The procedure describes the process and channel of external stakeholders request to respective estates level or corporate level by call at general line provided.</p> <p>Pamol Kluang POM has listed documents that are publicly available include:</p> <ol style="list-style-type: none"> <li>1. Land titles / user rights</li> <li>2. Safety and health plan</li> <li>3. Plans and impact assessments relating to environmental and social impacts</li> <li>4. Details of complaints and grievances</li> <li>5. Negotiation procedures</li> <li>6. Continuous improvement plan</li> </ol>	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p>	<p>IOI Group established Social Impact Assessment, Management Action Plans &amp; Continuous Improvement Plan which includes</p>	Complied

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	- Major compliance -	<p>Grievance Procedure, SOP 10.0 and mill management individually update on 19/10/2022.</p> <p>The SOP include flowcharts consist of process to manage employee grievance, sexual harassment, and land disputes with Appendix 9.0, Rev 1B, update 28/12/2020 as below document control number:</p> <ol style="list-style-type: none"> <li>1. 10.1 Employee grievance</li> <li>2. 10.2 Sexual harassment Grievance</li> <li>3. 10.3 Grievance for landowner issues.</li> </ol> <p>This SOP is also accompanied by a flowchart which details out the procedure for 10.1 Employee grievance, 10.2 Sexual harassment Grievance and 10.3 Grievance for landowner issues.</p> <p>IOI Group brief on the procedures and flowcharts to external stakeholders during External Stakeholder meeting conducted at Pamol Kluang POM dated 04/10/2022 attendee with 36 participants.</p>	
4.2.2.2	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p>- Minor compliance -</p>	<p>IOI Group at Pamol Kluang POM nominate Mr Shathyarubaan a/l Selvadurai, Mill Assistant Manager to be as social liaison officer as social liaison officer with appointment letter dated 05/09/2022.</p>	Complied
4.2.2.3	<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.</p> <p>- Major compliance -</p>	<p>Pamol Kluang POM established individual list of stakeholders which include government bodies, relevant embassies, NGOs, neighbouring estates/ smallholders, neighbouring villagers, suppliers, contractors, transporters, worshipping areas and schools. From document review, the list updated 01/10/2022 consists of external stakeholders' names, type of agencies, address, contact persons and contact number/ email address.</p>	Complied

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<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	IOI Group has established traceability procedure: MSPO Supply Chain – Oil Palm Mills (Segregation), ref no: MSPOSC/SOP/SG/1, Rev.02, dated on 01/09/2019. The purpose is applicable to incoming FFB, outgoing CPO & PK at RSPO certified mills that operate SG supply chain system. The mill is implementing Segregation System (SG) supply chain system for mill operation.	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	The estate management is using Electronic Plantation Management System in order to track the FFB harvest and delivery. Inspection and verification of the production were made on daily basis and agreed between both parties (employer and employees)	Complied
<b>4.2.3.3</b>	The management shall identified and assign suitable employees to implement and maintain traceability system. <b>- Minor compliance -</b>	Chua Seng Wei was appointed as Supply Chain Officer for Pamol Kluang Palm Oil Mill by Rajan A/L Sinathanmby dated 07/10/2021.	Complied
<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. <b>- Major compliance -</b>	All records of incoming FFB transported/received, CPO & PK produced and delivery, on daily basis were maintained and verified traceable through the delivery notes, lorry ticket & weighbridge which were maintained at the palm oil mill office. Records for year 2019, 2020 and 2021 were maintained and sighted.	Complied
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			

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<p><b>4.3.1.1</b> All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.  <b>- Major compliance -</b></p>	<p>Available a document titled Evaluation of License and Permits (Rev.03) Date Issued 01/12/2021 and evidence of compliance as below:</p> <ul style="list-style-type: none"> <li>• CHRA was conducted by Zakaria B. Abd Karim (HQ/04/ASS/00/193) on 19/04/19 from Env Consultancy &amp; Monitoring Services Sdn. Bhd.</li> <li>• Calibration for Weight Bridge 80,000 Kg (Serial No. 006034) was conducted under Peraturan 16, 28A and 45 of Akta Timbang dan Sukat 1972 and Peraturan-Peraturan Sukat dan Timbang 1981.on 30/06/2022 and valid till 30/06/2023. Conducted by Metrology Corporation Malaysia.</li> <li>• Diesel Storage 18,000 Litres having License from KPDNKK under Regulation 18 of Peraturan-Peraturan Kawalan Bekalan (Pindaan) 2021. Valid from 26/03/2022 to 25/03/2024.</li> <li>• MPOB License No. 500040104000 for Milling, transport, storage and etc. for FFB, PK, CPO, SPO.</li> <li>• The renewal of Fire Cert. (valid 11/11/2019-10/10/2020) under Fire Services Act 1988 was exempted as revision on Fire Services (Designated Premises) (Amendment) Regulations 2020. Letter from Jasni Yusof JBPM Johor dated 11/01/2020.</li> <li>• 2 times Environmental Audit to be conducted by 3<sup>rd</sup> Party Registered</li> <li>• Environmental Auditor. Latest conducted on 18/08/2022. Previous license was audited on 27/07/21 and 27/01/2022 by EA 0087 Ahmad Azuan b. Sheikh Omar.</li> </ul> <p><u>Major Non-conformity</u></p>	<p>Major Non-conformity</p>

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		<ul style="list-style-type: none"> <li>Fume Hood in the Lab found not notified to DOE as required under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014.</li> <li>SPAN License for extracting water under Water Services Industry Act 2006 and Water Services Industry (Licensing) Regulations 2007 under BAKAJ valid till 30/05/2024.</li> <li>Inspection by Hygiene Tech conducted on 05/07/2022 by See Jee Boon (HQ/21/JHII/00/00044-2022/042) for Fume Hood LEV System.</li> <li>Air Compressor (JH PMT 90498) CF valid till 03/01/2023.</li> </ul>	
<b>4.3.1.2</b>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>IOI Available and documented Legal Requirement Register for Mill dated and updated 11/06/19. Found not included legal such as:</p> <ul style="list-style-type: none"> <li>Occupational Safety and Health Act 1994 and its Regulations</li> <li>Factories and Machinery Act 1967 and its Regulations</li> <li>Environmental Quality Act 1974 and its Regulations</li> <li>Uniformed Building By-Law 1984</li> <li>Fire Services Act 1988</li> <li>Electrical Services Act 1990</li> <li>Pesticides Act 1974 and its Regulations.</li> <li>Others</li> </ul>	Complied
<b>4.3.1.3</b>	<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><b>- Major compliance -</b></p>	<p>Found Legal Requirement Register will be updated by the Sustainability, Safety &amp; Health Department, IOI Plantation if any new amendments or new regulations coming into force.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - <b>Minor compliance</b> -	Chua Seng Wei was appointed by Sr. Asst Mill Manager as Legal Liason Officer for Pamol Kluang Palm Oil Mill as Appointment Letter dated 07/10/2021.	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - <b>Major compliance</b> -	Land ownership such as land title and land lease documents is available. There is no change in the land ownership. All the land belongs to IOI Pamol Kluang Palm Oil Mill with title no.: 16590, lot 2429, 10 acres size of land.	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. - <b>Major compliance</b> -	Available as sampled a documents showing legal ownership of land as mentioned above which located inside Pamol Timur Estate.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - <b>Major compliance</b> -	Mill located inside Pamol Timur Estate and sharing the estate boundaryThe boundary of mill area clear demarcated with fence as indicated in a Mill Map and physical sighted.	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). - <b>Minor compliance</b> -	IOI Group established Social Impact Assessment, Management Action Plans & Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and mill management individually update on 19/10/2022.  The SOP included in flowchart of 10.3 Grievance for land issues describes on the process of any land squatters’ disputes handling as follow reference document:  1. Negotiation procedure through free, prior and informed consent SOP 6.11 appendix 5.0 effective date 17/01/2017.  Document review on complaints records and onsite interview with	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
		external stakeholder, no complaint or disputes recorded and issued. Thus, the criteria was not applicable.	
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	<p>IOI Group established Social Impact Assessment, Management Action Plans &amp; Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and mill management individually update on 19/10/2022.</p> <p>This SOP included in flowchart of 10.3 Grievance for land issues describes on the process of any land squatters’ disputes handling as follow reference document:</p> <ol style="list-style-type: none"> <li>1. Flowchart on squatters’ disputes handling.</li> <li>2. Negotiation procedure through free, prior and informed consent SOP 6.11 appendix 5.0 effective date 17/01/2017.</li> </ol> <p>Document review on complaints records and onsite interview with external stakeholder, no complaint or disputes recorded and issued.</p> <p>Pamol Kluang POM is located within Pamol Timur Estate with 4.10ha and lot no.2429, Mukim Kluang, District Kluang, Johor. The mill does not border with other estates.</p> <p>Document review on land title number G88881, Pamol Kluang POM is sharing land title with Pamol Plantations Sdn Bhd’s estate but manage by Pamol Timur Estate is perpetuity ownership with legal document of land title no. G88881 register dated on 30/11/2002.</p> <p>Not applicable since there is no customary rights. Pamol Kluang POM is located within Pamol Timur Estate and does not border with other estates.</p> <p>Therefore, no encroachment of land.</p>	Not Applicable

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4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - <b>Minor compliance</b> -	There are no customary rights and verified based on complaints records and consultation with stakeholder.	Not Applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - <b>Major compliance</b> -	There are no customary rights and verified based on complaints records and consultation with stakeholder.	Not Applicable
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - <b>Minor compliance</b> -	IOI Group established Social Impact Assessment, Management Action Plans & Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and mill management individually update on 19/10/2022.  Document review on the assessment, IOI Group’s estates has identified key social factors related to operating center and manage on appropriate measure by monitor the progress of the outcome in social management plan.  The key social factors identified as significant as follow: <ol style="list-style-type: none"> <li>1. No recruitment fees</li> <li>2. Expectation for better income</li> <li>3. Comfortable labor quarters and amenities</li> <li>4. Placing water dispenser at the mill office and compound</li> <li>5. Food waste in the drainage</li> <li>6. Placing dustbin for cleanliness and hygiene at the labor</li> </ol>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		quarters.	
<b>Criterion 4.4.2:</b> Complaints and grievances			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. - <b>Major compliance</b> -	IOI Group established Social Impact Assessment, Management Action Plans & Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and mill management individually update on 19/10/2022.	Complied
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - <b>Major compliance</b> -	IOI Group established Social Impact Assessment, Management Action Plans & Continuous Improvement Plan which includes Grievance Procedure, SOP 10.0 and mill management individually update on 19/10/2022.  Document review, the SOP describes timeline of handling complaint will be accessed as follow: <ol style="list-style-type: none"> <li>1. 5 days of complaint received</li> <li>2. 14 days for respond</li> <li>3. 30 days if required reference to HR.</li> </ol> Document review on logbook title complaint / grievance book and onsite interview with external stakeholder, no complaint or disputes recorded and issued. The record is only capture housing repair lodge by workers and the management responded as per timeline.	Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - <b>Minor compliance</b> -	Onsite visit to Pamol Kluang POM offices, observed the complaint and grievance book is available.  Onsite interview with workers informed they been briefed on the complaint procedure, mechanism and availability of the complaint book at their office.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p><b>- Minor compliance -</b></p>	<p>IOI Group brief on the procedures and flowcharts to external stakeholders during External Stakeholder meeting conducted at Pamol Kluang POM dated 04/10/2022 attendee with 36 participants.</p> <p>Pamol Kluang POM briefed complaint and grievance to employee during morning rollcall on 13/10/2022.</p>	Complied
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><b>- Major compliance -</b></p>	<p>Pamol Kluang POM manage and maintained for past 24 months. Document review on logbook title complaint / grievance book and onsite interview with external stakeholder, no complaint or disputes recorded and issued. The record is only capture housing repair lodge by workers and the management responded as per timeline with received latest repair lodged on 18/09/2022.</p>	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
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><b>- Minor compliance -</b></p>	<p>IOI Group has developed contribution program to local development through Yayasan Tan Sri Lee Shin Chin contribute various program includes education, community welfare, medical assistance natural disaster, social enterprise and promotion of Science, Technology, Engineering and Mathematics (STEM). The program display in IOI Group website at <a href="http://yayasan.ioigroup.com">yayasan.ioigroup.com</a> and internal news of 'Berita IOI' with latest issue no.: 95 (Jul – Sep 2022).</p> <p>IOI Group has advertised job vacancy to local community surrounding by displayed at MyFuture Jobs, Facebook page, Instagram Page and Tiktok Page dated 01/10/2022.</p> <p>Other than that, Pamol Kluang POM contribute donation to their respective local community such as donation to PIBG of Sekolah</p>	Complied

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		Kebangsaan Ladang Pamol.	
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	<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><b>- Major compliance -</b></p>	<p>Occupational Safety, health and Hygiene Policy of IOI Plantation (IOI Group) was approved and signed by N B Sudhakaran (Plantation Director) dated March 2022. It was written in Bahasa and English for better communication and understanding. Available and documented Safety and Health Programme for year 2022 for Palm Oil Mill</p> <p>IOI Group has established and documented Safety and Health Management Plan for PAMOL Palm Oil Mill (July 2020-June 2025) approved by Acting Manager of PAMOL Palm Oil Mill. Rev.15/11/2022.</p>	Complied
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>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"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as</li> </ul>	<ul style="list-style-type: none"> <li>a) OSH policy is communicated to all workers. It also made available as seen posted on notice board in Office and mill operation area.</li> <li>b) Available a document titled Palm Oil Mill HIRARC Masterlist. Listed 41 Process Locations such as Guard House, Loading Ramp, Oil Room, Effluent Pond, Workshop, Biogas Plant, Engine Room, Boiler Stations and etc dated 16/02/2022 with various revision status individually. Risk 1-4 (Low), 5-12 (Medium) and 15-25 (High). Hirarc Form found comprehensive with category of hazard, risk evaluation, Justification oif Likelihood, Risk Control (divided into each in hierarchy) and Risk Reevaluation. NRA was conducted for Pamol Plantation Sdn Bhd by Etosh Consult &amp; Engineering PLT by Assessor Nur Izzati Salleh (HQ/16/PEB/00/158). Area Monitoring on 12/05/2020 and Personal Monitoring on 12-13/05/2020. Total employee 140.</li> </ul>	Major Non-conformity

Criterion / Indicator	Assessment Findings	Compliance
<p>identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 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 ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>Audiometric Test was conducted by RZ Intan Medicare Sdn Bhd for Pamol Kluang POM between December 2021 to May 2022 for 52 employees. Results, 5 (10%) Required reset audiometry, Number of employee with possible work related hearing loss is 16 (31%), Abnormal Hearing Threshold-Hearing Impairment 21 (40%).</p> <p><u>Major Non-conformity</u></p> <p>During site visit at the Shovel operations at the EFB Yard, it was found that the Shovel was without side mirrors, rare view mirror, reverse censor and treadles tyres. HIRARC for Shovel dated 16/02/2022 was reviewed. The monitoring of the risk control was not effectively implemented.</p> <p>c) Awareness Training for Chemical operators was conducted on 02/09/22 (Chemical Handling and SDS).</p> <p>d) Sighted at Loading Bay, Driver of Tractor from Pamol Timur not wearing Safety Boots. Refer to HIRARC Tractor dated 16/02/2022 Safety boots is one of the required PPE other than Helmets and gloves.</p> <p>e) PAMOL Palm Oil Mill has established 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 under the Document Reference: IOI-OSH 3.2.2 Appendix 6 (31).</p> <p>f) Availa Organization Chart for SHC where Chairman is Acting Mill Manager (Rajan A/L Sinnthamby), Secretary is Chua Seng Wei, 10 employees representative and 10 employer representative.</p>	

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		<p>Available appointment letter dated 07/10/2021 for SHC members.</p> <p>g) SHC meeting was conducted regularly as evidence from Minutes of meeting conducted on 12/10/2022, 04/07/2022. 14/04/2022, 26/01/2022.</p> <p>h) Emergency Response Procedure updated 10/10/2021 in the form of flowchart for Accident &amp; Dangerous Occurrences Notification. The instruction found clearly explained with action needed.</p> <p>i) Workers trained as first aider as sighted records list of First Aider: Feft Joubert, Zainal Talib (Workshop), Logesroa (electrical), Shahrulnizam (Ramp), Mohd Fahmi (Process A), Baharudin (Boiler), Norazlin (Lab), Farah (Store), Izyan Izzati (Office), Tanaraj (Biogas). First Aid and CPR training was conducted on 22, 23/01/2022 and attended by 30 workers.</p> <p>j) Form JKPP 8 was submitted to DOSH for calendar 2021 by Chua Seng Wei dated 25/01/2022. Accident statistic was recorded and reported with 2 lost manday cases and 3 manday losses. Listed 7 cases of accident and 3 poisoning/occupational disease. As Minutes of Meeting of SHC conducted on 12/10/2022, 2 accident was reported: 1. Phoe Naing (Oil Room Operator), 9 days MC cuts on fingers Not wearing proper PPE).. 2. Roslan Ibrahim (Engine Driver), 26 days MC, dust enter eyes. (not wearing goggles).</p>	
<b>Criterion 4.4.5:</b> Employment conditions			
<b>4.4.5.1</b>	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy	IOI Group established Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer	Complied

Criterion / Indicator		Assessment Findings	Compliance																								
	shall be signed by the top management and communicated to the employees. <b>- Major compliance -</b>	and Dr Surina Ismail, Group Head of Sustainability dated 01/10/2020. Document review on the policy describe management commitment to comply with all applicable legislation and code of practices, to achieve higher level of transparency and stakeholder's engagement, to build traceable supplychain such that al suppliers are also in compliance with company commitment																									
<b>4.4.5.2</b>	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. <b>- Major compliance -</b>	IOI Group established Equal Opportunity Employment and Freedom of Association Policies signed by N B Sudhakaran, Plantation Director dated 01/10/2017. Document review on the policy describes management will ensure workers will be received equal treatment based on relevant merits and competency regardless of gender, race, caste, nationality, religion, physical condition, sexual orientation, marital status and others.	Complied																								
<b>4.4.5.3</b>	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. <b>- Major compliance -</b>	IOI Group has signed Collective Agreement signed between and the National Union of Plantation Workers which came into force on 01/01/2020 and valid until 31/12/2022. Pamol Kluang POM apply with new salary with MYR 1,500 follow as the Minimum Wages Order 2021. Sample for Pamol Kluang POM as follow: <table border="1" data-bbox="1086 1184 1865 1385"> <thead> <tr> <th>No.</th> <th>Job Descriptions</th> <th>Originality</th> <th>Passport / IC No</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Process Shift A</td> <td>India</td> <td>P8992517</td> </tr> <tr> <td>2.</td> <td>Process Shift A</td> <td>Nepal</td> <td>12230194</td> </tr> <tr> <td>3.</td> <td>Effluent Operator</td> <td>India</td> <td>P8993044</td> </tr> <tr> <td>4.</td> <td>Process Shift B</td> <td>India</td> <td>R0689659</td> </tr> <tr> <td>5.</td> <td>Process Shift A</td> <td>Nepal</td> <td>11881805</td> </tr> </tbody> </table>	No.	Job Descriptions	Originality	Passport / IC No	1.	Process Shift A	India	P8992517	2.	Process Shift A	Nepal	12230194	3.	Effluent Operator	India	P8993044	4.	Process Shift B	India	R0689659	5.	Process Shift A	Nepal	11881805	Complied
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Criterion / Indicator		Assessment Findings				Compliance
		6.	Auxiliary Police	Malaysia	990315-03-XXXX	
		7.	Effluent Operator	Malaysia	740916-01-XXXX	
		8.	Process Shift B	Myanmar	MF245503	
		9.	Process Shift B	Myanmar	ME95786	
		Payslip Sample for Pamol Kluang POM:				
		JD	Shift A Operator	Shift A Operator	Effluent Operator	
		Passport/ IC No	11881805	P8992517	740916-01-XXXX	
		Originality	Nepal	India	Malaysia	
		Day Rate/ Piece Rate	MYR 58.45 (Piece Rate)	MYR 59.83 (Piece Rate)	MYR 1,905.00 (Monthly Rate)	
		Working day	25	25	26	
		Overtime	MYR 595.10 Normal (55 hours) MYR 144.25 Restday (10 hours)	MYR 833.39 Normal (75 hours) MYR 177.78 Restday (12 hours)	MYR 851.71 Normal (62 hours) MYR 73.27 Restday (4 hours)	
		Gross Salary	MYR 3,077.27	MYR 3,000.69	MYR 3,542.25	
		Deduction	MYR 211.42 (Advance, Electricity, Water)	MYR 216.04 (Advance, Electricity, Water)	MYR 1,507.20 (Advance, EPF, SOCSO, Insurance SIP, AMESU Union Fee, Electricity)	
		Employer	MYR 33.10	MYR 36.90	MYR 351.35	

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		Contribution	(SOC SO)	(SOC SO)	(EPF, SOC SO, Insurance SIP)	
		Nett Salary	MYR 2,865.85	MYR 2,784.65	MYR 2,485.05	
<b>4.4.5.4</b>	<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><b>- Minor compliance -</b></p>	<p>IOI Group has ensured their contractors follow the industrial best practices in terms of hiring their own employee.</p> <p>monitor contractors' workers are paid according to minimum wages</p> <p>The contractor shall be solely responsible for their employees and workmen whereby the contractor shall pay and shall be solely responsible for the payment wages, salary, benefits, EPF contribution, SOC SO and any other benefits required under the laws of Malaysia.</p> <p>Document review on payslips, verified workers receive more than minimum wages, and SOC SO, EPF and EIS contributions made by both the workers and contractors.</p> <p>Pamol Kluang POM's contractor is Teo Tuan Kwee Sdn Bhd with payslip latest for October 2022.</p>				Complied
<b>4.4.5.5</b>	<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><b>- Major compliance -</b></p>	<p>Pamol Kluang POM established list of employees consist of employee number, full name, division, wages, NRIC / Passport no, employment category, nationality, DOB, age, race, and status in the checkroll system updated October 2022.</p> <p>Document review, employee information includes date of entry, job description and period of employment are contained in the respective employment contracts.</p> <p><u>Opportunity for Improvement</u></p> <p>The worker masterlist may improve on monitoring the period of workers passport and work permits validity</p>				OFI



Criterion / Indicator		Assessment Findings	Compliance
<b>4.4.5.6</b>	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. <b>- Major compliance -</b>	Pamol Kluang POM provide with fair contracts signed by both employee and employer. Both parties will have copy for reference. The employment contracts which contents comply with Employment Act 1955. Document review, the contracts were prepared in either Bahasa Malaysia (for Malaysians and Indonesians) and in dual language (English and either Nepali, Hindi, Bengali) for workers from India, Nepal or Bangladesh.	Complied
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. <b>- Major compliance -</b>	Pamol Kluang POM established time recording system and monitored by factory supervisor. Document review, overtime of worker will monitor by themselves, and the data will be transfer into overtime requisition form. The form then will be verified by factory supervisor, assistant mill engineers and mill manager.	Complied
<b>4.4.5.8</b>	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. <b>- Major compliance -</b>	Pamol Kluang POM provide with fair contracts signed by both employee and employer. The employment contracts which contents comply with Employment Act 1955 includes with working hours of 8 hours and overtime. Working day for mill starting from Monday to Saturday with two (2) shifts. Working hours displayed at mill office which show the time starting from 7.30 am until 3.30 pm inclusive 1 hours for lunch break time. Overtime rate which stated 1.5 for normal hours rate, 2.0 from normal rate for rest days and 3.0 for public holiday and will not exceed 104 hours per months <u>Opportunity for Improvement</u>	OFI

Criterion / Indicator		Assessment Findings	Compliance																																								
		The management can be enhanced on the understanding of working hours, break and overtime among employees.																																									
<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Pamol Kluang POM provide with fair contracts signed by both employee and employer. Both parties will have copy for reference.</p> <p>The employment contracts which contents comply with Employment Act 1955.</p> <p>Pamol Kluang POM used the overtime requisition form established with effect 01/12/2021. Workers request for overtime work before commencing work. With the agreement of the workers concerned, Management will revise the working hours accordingly in the Overtime Requisition form if there are any changes to the original OT hours requested.</p> <p>Management use the attached Overtime Requisition form (Appendix 1) and flow-chart (Appendix 2) to monitor payment of wages for normal and overtime work carried out by all workers.</p> <p>Pamol Kluang POM's sampled workers implement being review with latest requisition dated 30/10/2022 as below:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Job Descriptions</th> <th>Originality</th> <th>Passport / IC No</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Process Shift A</td> <td>India</td> <td>P8992517</td> </tr> <tr> <td>2.</td> <td>Process Shift A</td> <td>Nepal</td> <td>12230194</td> </tr> <tr> <td>3.</td> <td>Effluent Operator</td> <td>India</td> <td>P8993044</td> </tr> <tr> <td>4.</td> <td>Process Shift B</td> <td>India</td> <td>R0689659</td> </tr> <tr> <td>5.</td> <td>Process Shift A</td> <td>Nepal</td> <td>11881805</td> </tr> <tr> <td>6.</td> <td>Auxiliary Police</td> <td>Malaysia</td> <td>990315-03-XXXX</td> </tr> <tr> <td>7.</td> <td>Effluent Operator</td> <td>Malaysia</td> <td>740916-01-XXXX</td> </tr> <tr> <td>8.</td> <td>Process Shift B</td> <td>Myanmar</td> <td>MF245503</td> </tr> <tr> <td>9.</td> <td>Process Shift B</td> <td>Myanmar</td> <td>ME95786</td> </tr> </tbody> </table>	No.	Job Descriptions	Originality	Passport / IC No	1.	Process Shift A	India	P8992517	2.	Process Shift A	Nepal	12230194	3.	Effluent Operator	India	P8993044	4.	Process Shift B	India	R0689659	5.	Process Shift A	Nepal	11881805	6.	Auxiliary Police	Malaysia	990315-03-XXXX	7.	Effluent Operator	Malaysia	740916-01-XXXX	8.	Process Shift B	Myanmar	MF245503	9.	Process Shift B	Myanmar	ME95786	Complied
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<p><b>4.4.5.10</b> 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.</p> <p><b>- Minor compliance -</b></p>	<p>IOI Group has forms of social benefits and insurance for all employees that mandatory contribute to local and foreign workers based on monthly contribution. This includes in the employment contract of remuneration, working hours, rate of pay, leaves and any other benefits of employment entitle to them.</p>	<p>Complied</p>
<p><b>4.4.5.11</b> In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p><b>- Major compliance -</b></p>	<p>Pamol Kluang POM provides for its employees, free houses, subsidised water and electricity, free medical treatment and facilities, worshipping facilities such as mosque, Hindu and Buddhist temples, chapel, futsal court, volleyball court, transport allowance for field checkers, mandores, and auxiliary police.</p> <p>Onsite visits to linesite and onsite interviews with workers, Pamol Kluang POM able to demonstrate that workers living quarters provided are habitable and comply with the Employees' Minimum Standard of Housing and Accommodation and Amenities Act 1990.</p> <p>Pamol Kluang POM conduct linesite inspection with latest conduct on 24/10/2022.</p> <p><u>Opportunity for Improvement</u></p> <p>The linesite inspection can be further improved to identify all potential issue which may lead to unconducive conditions.</p>	<p>OFI</p>
<p><b>4.4.5.12</b> The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>IOI Group has been established in the document title Guidelines for handling harassment at workplace document number IOI/G/SE/004 revision 02 dated 26/11/2020.</p> <p>Mentioned in the policy that the objective is to provide impartial process in dealing with harassment and sexual harassment. Mentioned also that the company is committed to promote safe and healthy work environment which free from unlawful discrimination.</p>	<p>Complied</p>

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<p><b>4.4.5.13</b> 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><b>- Major compliance -</b></p>	<p>IOI Group established Equal Opportunity Employment and Freedom of Association Policies signed by N B Sudhakaran, Plantation Director dated 01/10/2017.</p> <p>Document review on the policy describes management will ensure workers will be received equal treatment based on relevant merits and competency regardless of gender, race, caste, nationality, religion, physical condition, sexual orientation, marital status and others.</p> <p>Sighted also was the Collective Agreement signed between IOI Group of Companies and the National Union of Plantation Workers came into force on 01/01/2020 and valid until 31/12/2022.</p> <p>Onsite interview with workers informed they feedback that there is no prohibition to join any union and participate as member of NUPW. And they been briefed on the new collective agreement during NUPW meeting with the union officer.</p> <p>Pamol Kluang POM conduct Internal Stakeholder meeting, Jawatankuasa Perundingan Pekerja and Women Committee (WEC) meeting to discuss on social issues related to workers benefit, welfare, women empowerment activities and housing matters as below:</p> <ol style="list-style-type: none"> <li>1. Internal Stakeholder meeting on 05/10/2022</li> <li>2. Jawatankuasa Perundingan Pekerja on 20/10/2022</li> <li>3. WEC meeting on 13/04/2022.</li> </ol> <p>Onsite interview with workers informs they does understand that management does not discriminate or retaliate against union members.</p>	<p>Complied</p>

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<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. <b>- Major compliance -</b>	IOI Group established Sustainable Oil Palm Policy includes protection for children signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer and Dr Surina Ismail, Group Head of Sustainability dated 01/10/2020.  Document review, the policy state in Paragraph 4 describes that IOI Group would eliminate all forms of child labour.  Document review on employee master and onsite interview with workers informed they are no children working in the estate with age less than 18 years old.	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. <b>- Major compliance -</b>	Available training Programme for Year 2022 established for staff of mill operation. Below are among record of training conducted: <ul style="list-style-type: none"> <li>• First Aid and CPR training was conducted on 22, 23/01/2022 and attended by 30 workers.</li> <li>• Fire Drill Training was conducted on 05/09/2022 and attended by 30 workers.</li> </ul>	Complied
<b>4.4.6.2</b>	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. <b>- Major compliance -</b>	Training Matrix and Training Need Analysis Year 2020 available. Covering Staff such as Mill Manager, Assistant Managers, Office Staff, Production Supervisor, Storekeeper, Lab, Mechanical Staff, Electrical Staff, Ramp Operator, Operation Staff, Safety and Health Committee, ERT and First Aider.	Complied
<b>4.4.6.3</b>	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.	Continuous Training included operational SOP trainings in mill recommended throughout the year as in Frequency Training Needs document where training will be conducted monthly, quarterly, half-yearly, yearly or when required. The frequency clearly stated	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	in a matrix format for related personnel and types of training needed.	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	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 -	Environmental Policy was address in IOI Group Sustainable Palm Oil Policy under section Environmental Management dated 2020 signed by the Group Managing Director and Chief Executive Officer. The policy was communicated to the employee through displayed at notice board around the mill, training and morning briefing.	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The operating units have conducted the aspects and impacts analysis and documented in the Environmental Risk Assessment from. The analysis was reviewed on annually basis. Latest review was conducted in 17/11/2022	Complied
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	Base on the environmental aspects impacts conducted, the mill established action plan documented in the Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme. Reviewed the implementation of the management plan as follows: 1. The estate conduct vehicle repair and maintenance on timely basis and maintain the records of to ensure all vehicle working in good condition, optimize usage of fuel. Reviewed the records of maintenance for shovel as per Service Purchase Order no. 4534061579 dated 17/11/2022.	Minor Non-conformity

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		<p>2. The mill has budgeted in 2022/23 annual budget for EFB concrete storage bay c/w roofing shed.</p> <p>3. The mill monitored the usage of diesel usage per CPO produced on monthly basis to ensure optimize usage of diesel. Reviewed the monitoring records FY 2022. As to-date October 2022, the diesel consumption recorded at 0.92 L/ton CPO</p> <p>Sighted during site visit at the EFB yard, it was noticed that the drain surrounding the EFB yard was clogged with EFB and soil. It was noted that leachate from the drain was overflow onto the adjacent ground.</p> <p>As stated in the environmental management plan, all leachate from the EFB collection yard must be diverted back into effluent system. This show that the management plan established was not effectively implemented.</p>	
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>Program to promote the positive impacts was documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme.</p> <p>1. The estate continuously promote the 3R (reduce, reuse and recycle) program to the workers. The mill has established recycle waste collection centre at the line site area. Sighted during site visit the recycle waste collector collect the recycle waste.</p> <p>2. The mill monitor reused the mill by-product, shell and fibre as fuel for boiler. As to-date October 2022, the fibre and usage/CPO produced was recorded at 0.87 ton/FFB.</p>	Complied
<b>4.5.1.5</b>	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy,</p>	<p>The mill continuously provided training to the employee to ensure the understanding on the environmental policy, objectives and</p>	Complied

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	objectives and management plans and are working towards achieving objectives. <b>- Major compliance -</b>	management plans. Noted during interview, the understanding on the environmental issue were acceptable. Reviewed the sampled training materials and attendance for training conducted as follows: 1. Oil trap maintenance training dated 07/10/2022 2. Water quality index training dated 03/09/2022 3. Waste segregation and scheduled waste training dated 25/08/2022 4. Wildlife, RTE training dated 25/08/2022	
<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. <b>- Major compliance -</b>	The mill has established Environmental Performance Monitoring Committee. The committee meeting was conducted on quarterly basis. Reviewed the latest minutes meeting conducted on 15/06/2022 and 29/09/2022.	Complied
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<b>4.5.2.1</b>	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 <b>- Major compliance -</b>	The operating units has established plan for efficiency of the use of fossil fuels documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme under section 2.0 Identification and Management Plan of Potential Pollutants Source and Potential Source of GHG Emission. Reviewed the implementation of the management as follows: 1. The mill monitored the usage of diesel usage per CPO produced on monthly basis to ensure optimize usage of diesel. Reviewed the monitoring records FY 2022. As to-date October 2022, the diesel consumption recorded at 0.92 L/ton CPO	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		2. The mill monitor reused the mill by-product, shell and fibre as fuel for boiler. As to-date October 2022, the fibre and usage/CPO produced was recorded at 0.87 ton/FFB.	
<b>4.5.2.2</b>	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. <b>- Major compliance -</b>	The mill has established baseline for diesel usage base on 3 years diesel consumption trend. The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations.	Complied
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	The mill monitor reused the mill by-product, shell and fibre as fuel for boiler. As to-date October 2022, the fibre and usage/CPO produced was recorded at 0.87 ton/FFB.	Complied
<b>Criterion 4.5.3: Waste management and disposal</b>			
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	The operating units has identified the waste generated from the mill operation. A management plan has been established based on the waste identified and documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme under section 1.0 Identification of Waste Products/Pollutants. The waste generated was categorised base on source of pollution as follows: 1.1 Washing of Floor Lubricant, CPO from Marshalling Yards, Ramp Etc 1.2 Smoke emission 1.3 Noise pollution 1.4 Schedule waste store 1.5 Disposal of spent oil/ lubricants and empty chemical containers	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		1.6 Clinical waste 1.7 Domestic and recyclable waste, scrap iron, construction waste, sewage and green residue	
<b>4.5.3.2</b>	<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. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>A management plan has been established based on the waste identified and documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme under section 1.0 Identification of Waste Products/Pollutants.</p> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>1. The domestic waste for mill housing were manage by sister estate, Pamol Timur Estate. The estate collected domestic waste twice a week and send to BIN located away from the housing area. The appointed contractors, Sinar YSM Enterprise will transport the BIN to municipal landfill twice a week.</li> <li>2. The estate continuously promote the 3R (reduce, reuse and recycle) program to the workers. The mill has established recycle waste collection centre at the line site area. Sighted during site visit the recycle waste collector collect the recycle waste.</li> <li>3. The mill monitor reused the mill by-product, shell and fibre as fuel for boiler. As todate October 2022, the fibre and usage/CPO produced was recorded at 0.87 ton/FFB.</li> <li>4. The mill has budgeted in 2022/23 annual budget for EFB concrete storage bay c/w roofing shed.</li> </ol>	Complied
<b>4.5.3.3</b>	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,	Procedure for handling of scheduled waste was addressed in Safe Operating Procedure, Scheduled Waste Procedure. Refer document	Complied

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Criterion / Indicator		Assessment Findings	Compliance																								
	<p>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><b>- Major compliance -</b></p>	<p>ref. no. IOI-OSH 3.2.2, rev. no. 1, Appendix 12 (English) dated 22/05/2020.</p> <p>Scheduled waste generated were stored in designated places until the time of disposal. The store was under lock and key. Stores for scheduled waste were inspected and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>The mill maintain the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of August, September and October 2022.</p> <p>The scheduled waste was disposed through licensed operator, Kualiti Alam Sdn. Bhd. Reviewed the disposal records as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>SW</th> <th>Consignment note no</th> </tr> </thead> <tbody> <tr> <td rowspan="10">18/10/2022</td> <td>429</td> <td>2022101816H4MDK3</td> </tr> <tr> <td>410</td> <td>2022101816KFGI1A</td> </tr> <tr> <td>409</td> <td>2022101816WO6MD5</td> </tr> <tr> <td>312</td> <td>2022101816NPGKIR</td> </tr> <tr> <td>306</td> <td>2022101816JY3OH4</td> </tr> <tr> <td>305</td> <td>2022101816N59YJT</td> </tr> <tr> <td>110</td> <td>20221018163QCGVL</td> </tr> <tr> <td>109</td> <td>2022101816S5YN27</td> </tr> <tr> <td>104</td> <td>20221018166CDKM9</td> </tr> <tr> <td>103</td> <td>20221018169SJCHT</td> </tr> </tbody> </table>	Date	SW	Consignment note no	18/10/2022	429	2022101816H4MDK3	410	2022101816KFGI1A	409	2022101816WO6MD5	312	2022101816NPGKIR	306	2022101816JY3OH4	305	2022101816N59YJT	110	20221018163QCGVL	109	2022101816S5YN27	104	20221018166CDKM9	103	20221018169SJCHT	
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	109	2022101816S5YN27																									
	104	20221018166CDKM9																									
	103	20221018169SJCHT																									
<b>4.5.3.4</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p><b>- Minor compliance -</b></p>	<p>The domestic waste for mill housing were manage by sister estate, Pamol Timur Estate. The estate collected domestic waste twice a week and send to BIN located away from the housing area. The</p>	Complied																								

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Criterion / Indicator		Assessment Findings	Compliance		
		appointed contractors, Sinar YSM Enterprise will transport the BIN to municipal landfill twice a week for disposal.			
<b>Criterion 4.5.4:</b> Reduction of pollution and emission					
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	The mill has conducted assessment of all polluting activities during aspects and impacts analysis and documented in the Environmental Risk Assessment from. The analysis was reviewed on annually basis. Latest review was conducted in 17/11/2022.	Complied		
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	The operating units has established plan for efficiency of the use of fossil fuels documented in Environmental Impact Assessment, Management Action Plans and Continuous Improvement Programme under section 2.0 Identification and Management Plan of Potential Pollutants Source and Potential Source of GHG Emission. Reviewed the implementation of the management as follows: 1. Sighted the sampled if stack sampling conducted as follows: <table border="1" style="width: 100%;"> <tr> <td>Report no.: AEMR(J)/22-01/20 Date sampled: 24/01/2022 Result: 135.00 mg/m3 @ 12.0% CO2 lower than the allowable emission of 400 mg/m3</td> </tr> <tr> <td>Report no.: AEMR(J)/22-06/20 Date sampled: 02/06/2022 Result: 273.20 mg/m3 @ 12.0% CO2 lower than the allowable emission of 400 mg/m3</td> </tr> </table> 2. Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 004723. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 mg/l for	Report no.: AEMR(J)/22-01/20 Date sampled: 24/01/2022 Result: 135.00 mg/m3 @ 12.0% CO2 lower than the allowable emission of 400 mg/m3	Report no.: AEMR(J)/22-06/20 Date sampled: 02/06/2022 Result: 273.20 mg/m3 @ 12.0% CO2 lower than the allowable emission of 400 mg/m3	Complied
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		land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. 3. The effluent analysis confirm with condition prescribed under Compliance Schedule.																									
<b>4.5.4.3</b>	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. <b>- Major compliance -</b>	<p>Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 004723. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. Sighted the quarterly return form as follows:</p> <p>2<sup>nd</sup> quarter 2022</p> <table border="1"> <thead> <tr> <th></th> <th>Apr 2022</th> <th>May 2022</th> <th>Jun 2022</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.21</td> <td>8.64</td> <td>8.45</td> </tr> <tr> <td>BOD</td> <td>34.00</td> <td>44.00</td> <td>45.00</td> </tr> </tbody> </table> <p>3<sup>rd</sup> quarter</p> <table border="1"> <thead> <tr> <th></th> <th>Jul</th> <th>Aug</th> <th>Sep</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>7.68</td> <td>8.79</td> <td>8.59</td> </tr> <tr> <td>BOD</td> <td>38.00</td> <td>49.00</td> <td>38.00</td> </tr> </tbody> </table> <p>The effluent analysis confirm with condition prescribed under Compliance Schedule.</p>		Apr 2022	May 2022	Jun 2022	pH	8.21	8.64	8.45	BOD	34.00	44.00	45.00		Jul	Aug	Sep	pH	7.68	8.79	8.59	BOD	38.00	49.00	38.00	Complied
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<b>Criterion 4.5.5: Natural water resources</b>																											
<b>4.5.5.1</b>	The management shall establish water management plans to maintain the quality and availability of natural water resources	The mill has established Water Management Plan FY 2022. Latest review was conducted in 15/11/2022. The plan focusing on	Complied																								

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Criterion / Indicator	Assessment Findings	Compliance						
<p>(surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>Abstraction of Physical Water for FFB Milling and Domestic Use, Wastewater treatment and discharge, monitoring of water quality, monitoring of water for processing and domestic usage, alternative source for domestic use and emergency response plan. Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>1. The mill monitor the water usage for processing on monthly basis. as at October 2022, water usage for FFB processing per CPO produced was recorded at 4.98 L/ton CPO</li> <li>2. The mill conducted river water sampling on monthly basis. Reviewed the water sampling analysis results as follows:</li> </ol> <table border="1" data-bbox="1131 778 1868 943"> <tr> <td>Report no.: LP/1022/6418 (1 – 4)</td> </tr> <tr> <td>Date sampled: 04/10/2022</td> </tr> <tr> <td>Result: all sampling points within Class III of the National Water Quality Standards of Malaysia.</td> </tr> </table> <table border="1" data-bbox="1131 943 1868 1106"> <tr> <td>Report no.: LP/0922/6260 (1-4)</td> </tr> <tr> <td>Date sampled: 06/09/2022</td> </tr> <tr> <td>Result: all sampling points within Class III of the National Water Quality Standards of Malaysia.</td> </tr> </table>	Report no.: LP/1022/6418 (1 – 4)	Date sampled: 04/10/2022	Result: all sampling points within Class III of the National Water Quality Standards of Malaysia.	Report no.: LP/0922/6260 (1-4)	Date sampled: 06/09/2022	Result: all sampling points within Class III of the National Water Quality Standards of Malaysia.	
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<p><b>4.5.5.2</b> 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><b>- Major compliance -</b></p>	<p>Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 004723. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. The effluent analysis confirm with condition prescribed under Compliance Schedule.</p>	<p>Complied</p>						

Criterion / Indicator	Assessment Findings	Compliance	
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Mill Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	IOI Plantation Services Sdn Bhd has developed and documented Group Standard Operating Procedure (IOI/SOP/A) rev.02 dated 01/07/17. Among listed such as: <ul style="list-style-type: none"> <li>• FFB Reception</li> <li>• FFB Handling</li> <li>• Sterilizer</li> <li>• Threshing</li> <li>• Digestion and Pressing</li> <li>• Oil Room</li> <li>• Depericarper</li> <li>• Nut and Kernel Plant</li> <li>• Product Storage and Despatch</li> <li>• Laboratory</li> <li>• Effluent Treatment Plant</li> <li>• Water Treatment Plant</li> <li>• Biogas Plant</li> <li>• Polishing Plant</li> <li>• Boiler</li> <li>• Engine Room</li> <li>• Workshop and Shovel.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.1.2	All palm oil mills shall implement best practices. - <b>Major compliance</b> -	The Oil palm Mill has implemented best practices by having proper monitoring of emission such as installation of CMS system and Air polluting control system.	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
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. - <b>Major compliance</b> -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 21/2022 and business plan FY 2021/22 – FY 2025/26 In the 5 years business plan include items as follows: 1. Crop Projection 2. Oil Extraction Rate (OER) and Kernel Extraction Rate (KER) 3. General Charges a. Supervision b. Labour c. Others d. Sustainability e. Vehicle Running 4. Production Cost a. ManPower Cost b. Mill Processing Cost c. Dispatch Cost 5. Depreciation Cost 6. Cost per MT/FFB (RM)	Complied



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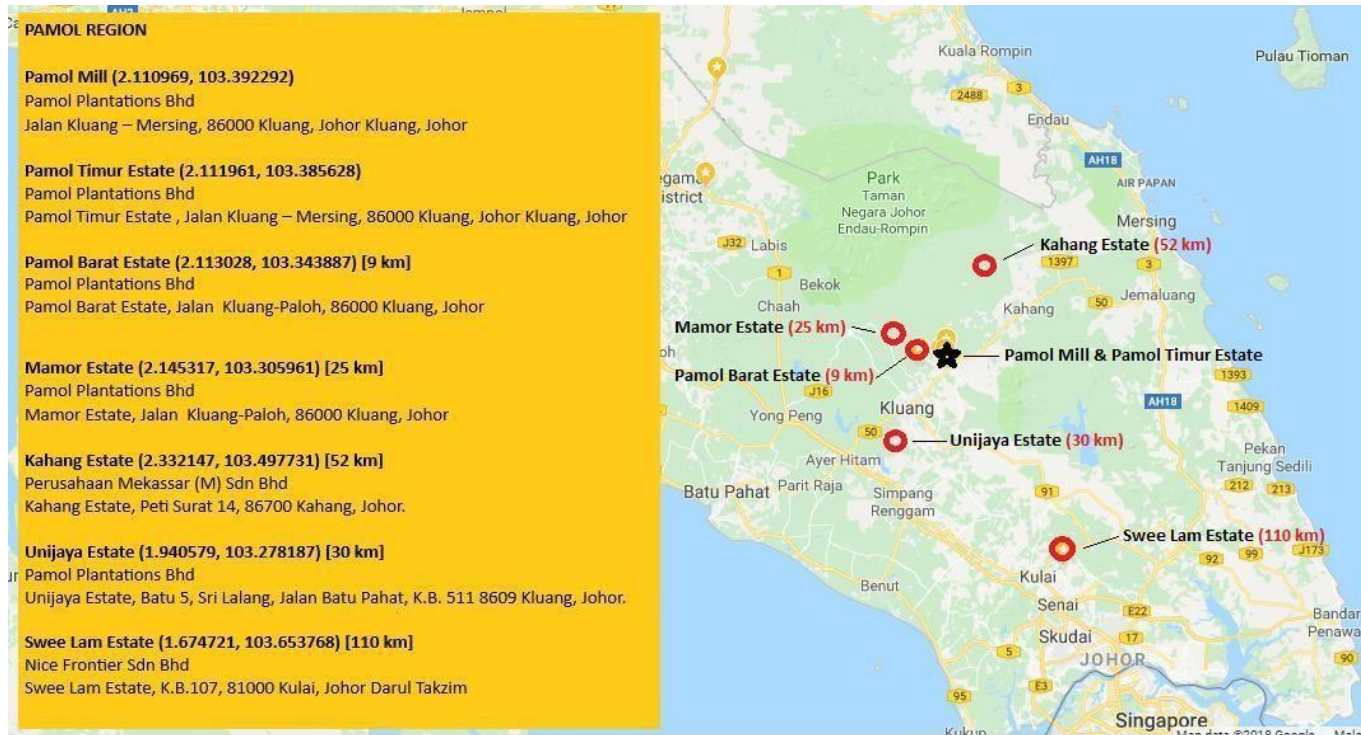
Criterion / Indicator		Assessment Findings	Compliance
		7. Cost per MT/Palm Product (RM)	
<b>Criterion 4.6.3:</b> Transparent and fair price dealing			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	IOI Group established pricing mechanism has been documented in the contract agreement and contractors are explained on the terms of contracts prior to the signing of the contract.  Document review, sample of contract agreement and payment has been taken for the mill as per contract between the mill and SP Shine Enterprise, Transporting EFB & POME, Hire Shovel & JCB Machine contract no.: PMM/007-22/23	Complied
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	IOI Group ensure all contracts is fair, legal and transparent with their contractors by establishing binding contract agreement and signed by both parties.  The pricing of task been briefed and agreed as describes in contract agreement with payments timeline terms.  Document review, sample of contract agreement and payment has been taken for the mill as per below:  1. SP Shine Enterprise, Transporting EFB & POME, Hire Shovel & JCB Machine contract no.: PMM/007-22/23  Payment Voucher: 7100001460, dated 12/11/2022  Invoices number: 1188, PO No.: 4534060738, Dated: 31/10/2022	Complied
<b>Criterion 4.6.4:</b> Contractor			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required	Prior signing the contract agreement, all contractors were required to read, understand and acknowledge as follows:	Complied

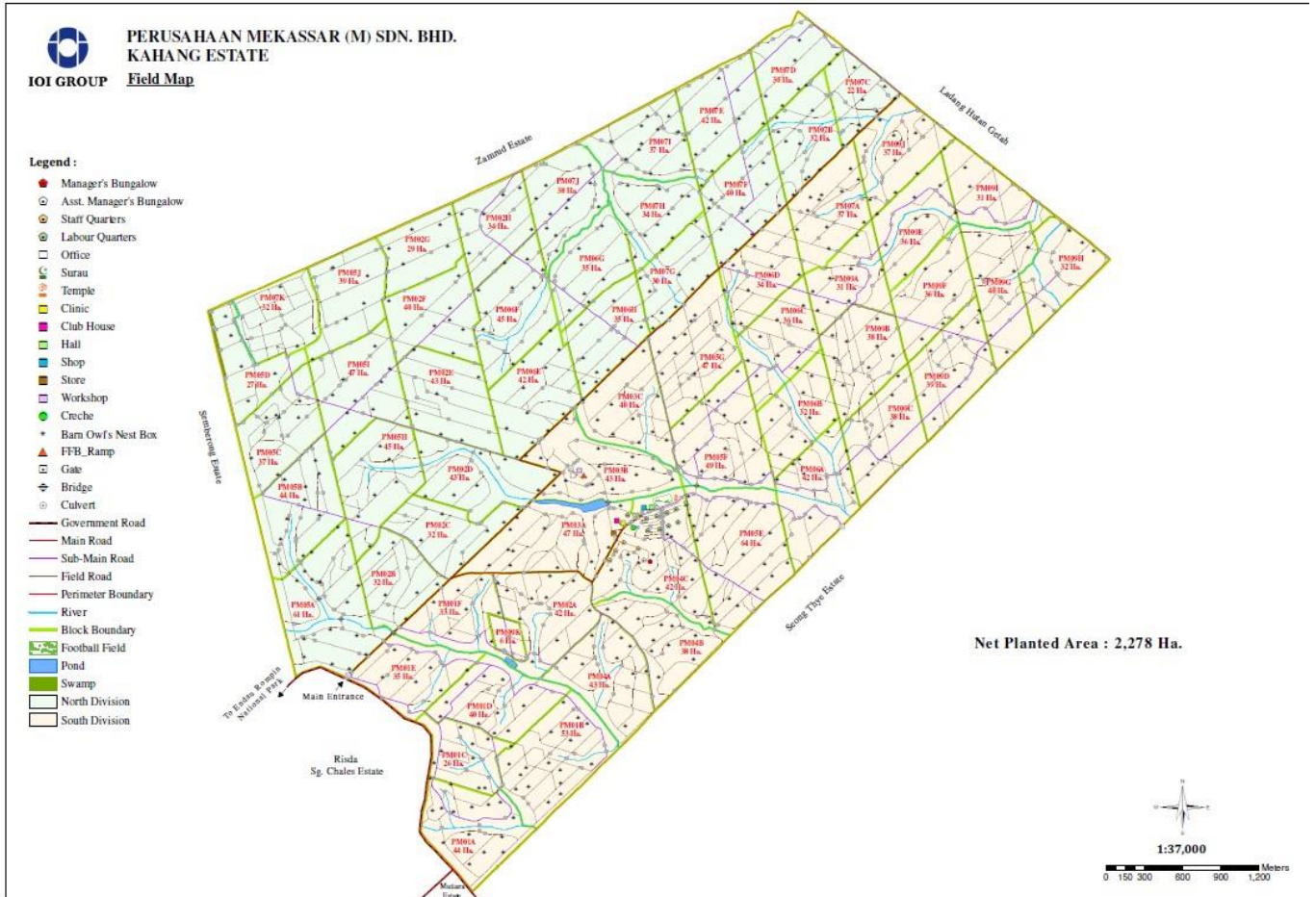
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Criterion / Indicator		Assessment Findings	Compliance
	documentation and information. <b>- Major compliance -</b>	1. Sustainability requirements for contractors and service provider, rev. no 03 dated 01/12/2020. 2. Transport Policy 3. Safety and Health Instruction for Contractors In the Sustainability requirements stated as follows: Contractors are to be aware and comply with all applicable local, national and ratified international laws and regulations including sustainability requirements (e.g. RSPO, RSPO Next, MSPO, ISCC, etc.) including no child, forced and trafficked labour. Reviewed the contract between Pamol Plantations Sdn. Bhd. (Pamol Palm Oil Mill) with Tewtan Enterprise Sdn. Bhd. dated 01/09/2021	
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	Mill has prepared a standard contract for all the contractors. The signed copy of the contract available at the estate office. Reviewed the contract between Pamol Plantations Sdn. Bhd. (Pamol Palm Oil Mill) with Tewtan Enterprise Sdn. Bhd. dated 01/09/2021.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. <b>- Minor compliance -</b>	As stated in the Sustainability requirements for contractors and service provider, rev. no 03 dated 01/12/2020 under section 1 stated that the company and its certification bodies have the right to audit the Contractor/Service provider.	Complied

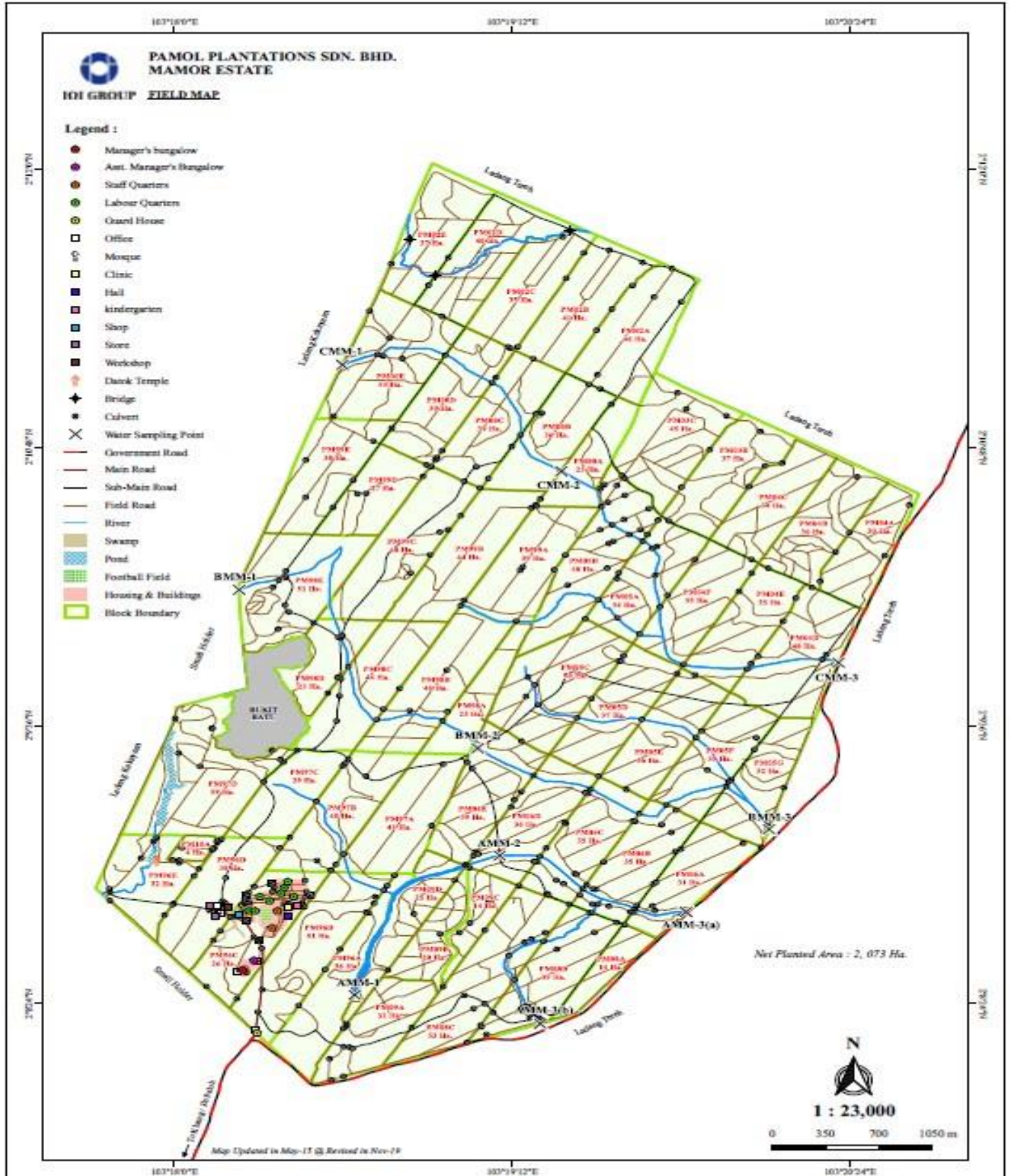


**Appendix C: Location and Field Map**

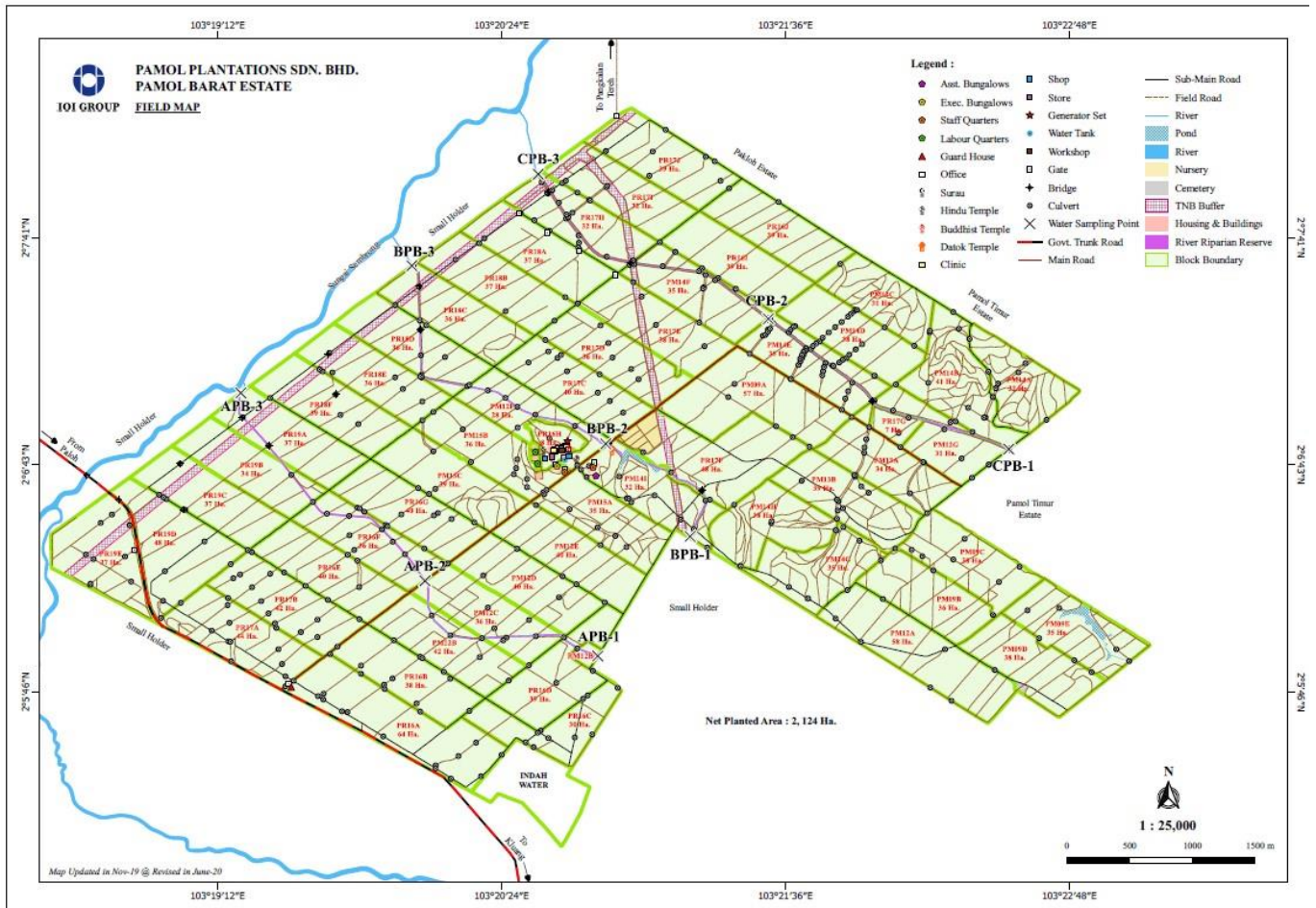






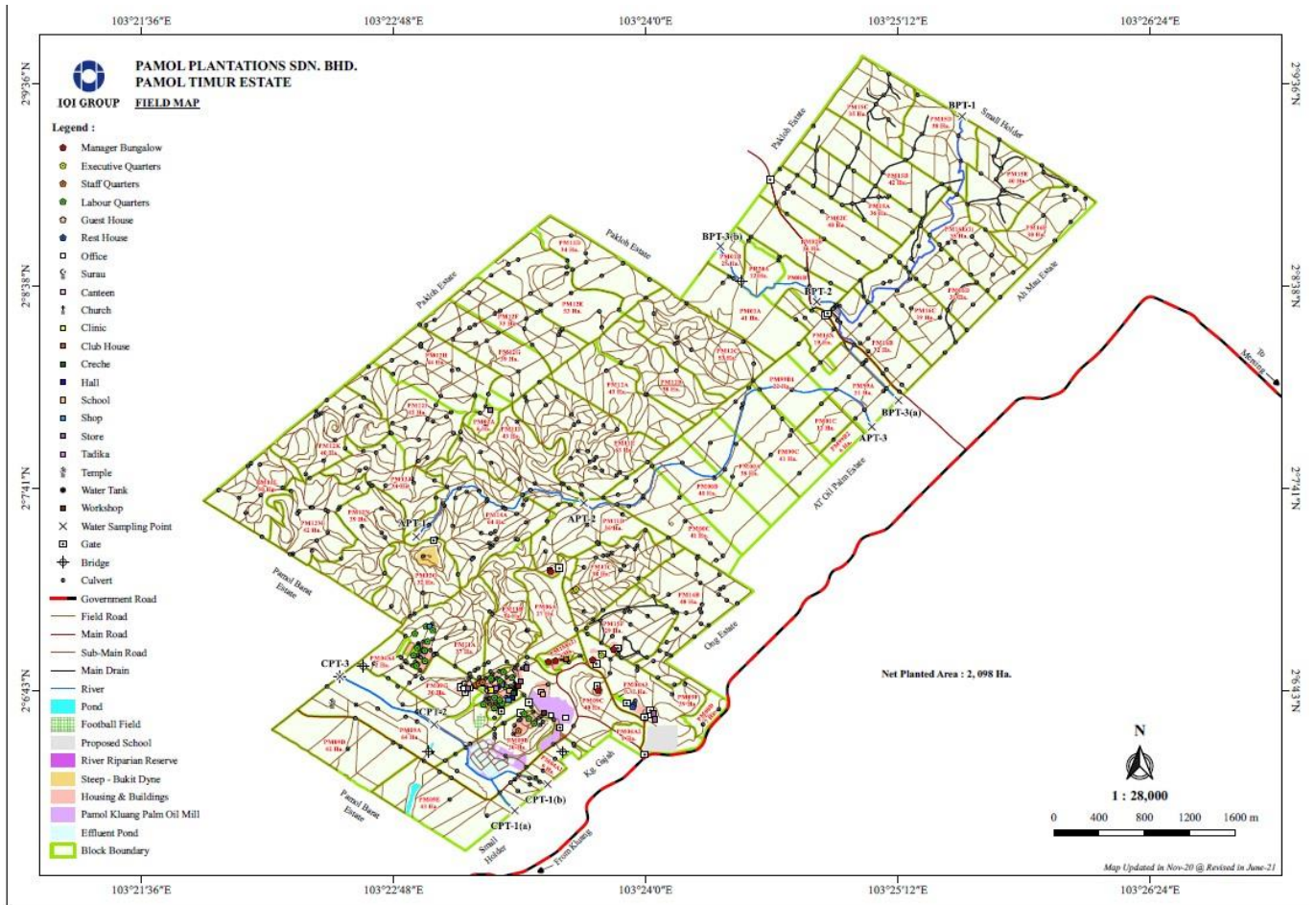


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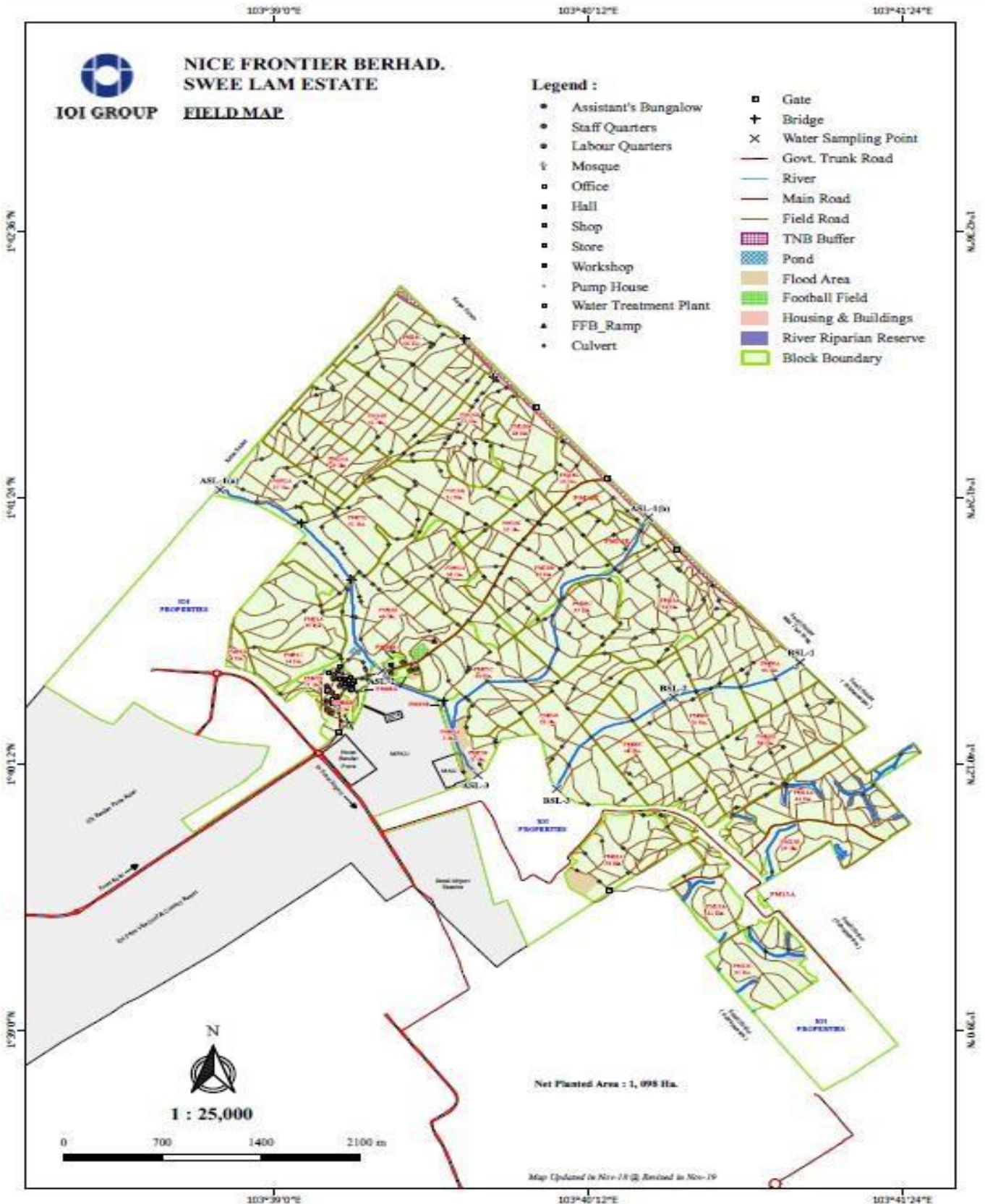


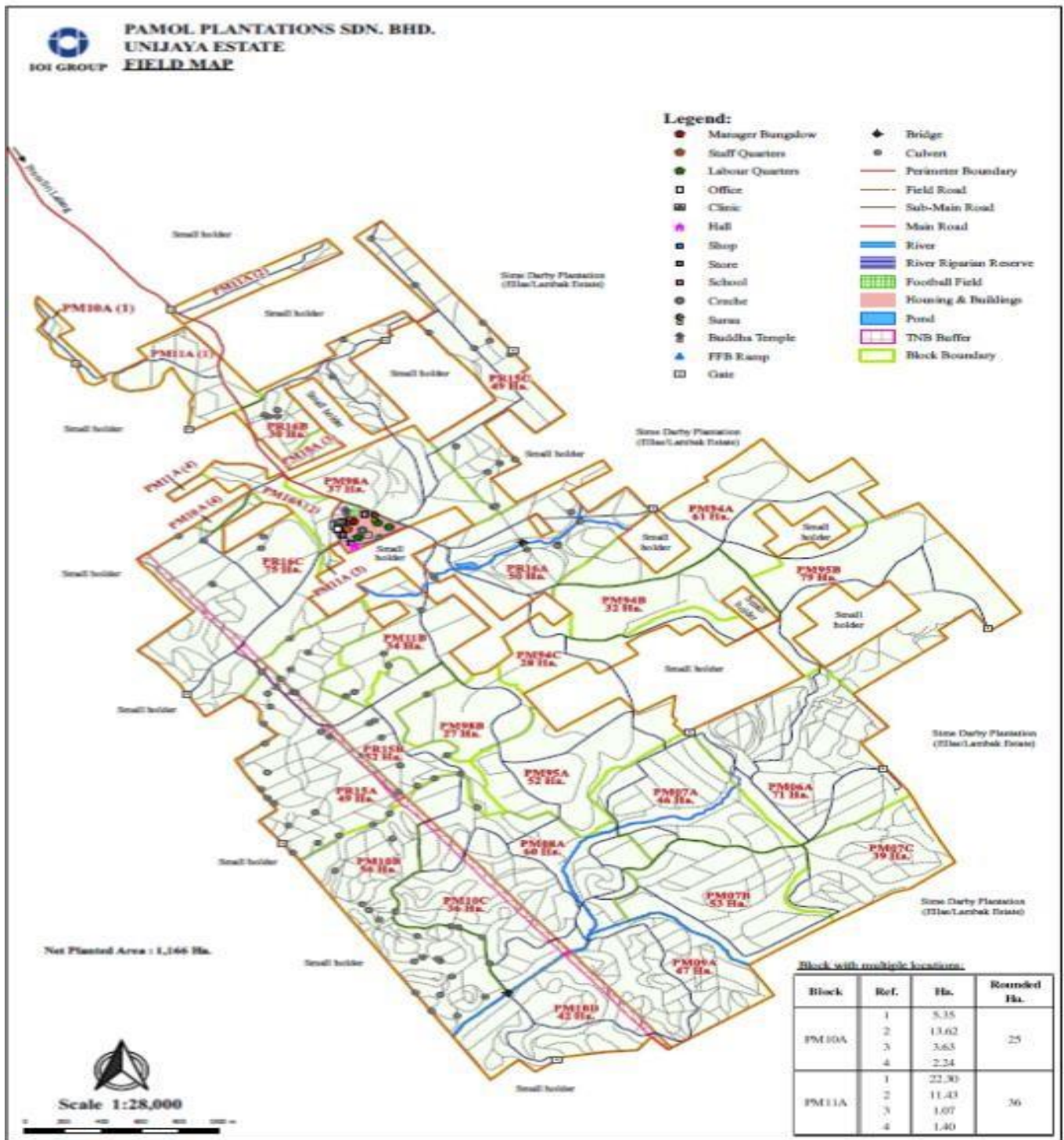


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**Appendix D: List of Abbreviations**

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