

**RSPO PRINCIPLE AND CRITERIA –
4th ANNUAL SURVEILLANCE ASSESSMENT (ASA1_4)
Public Summary Report**

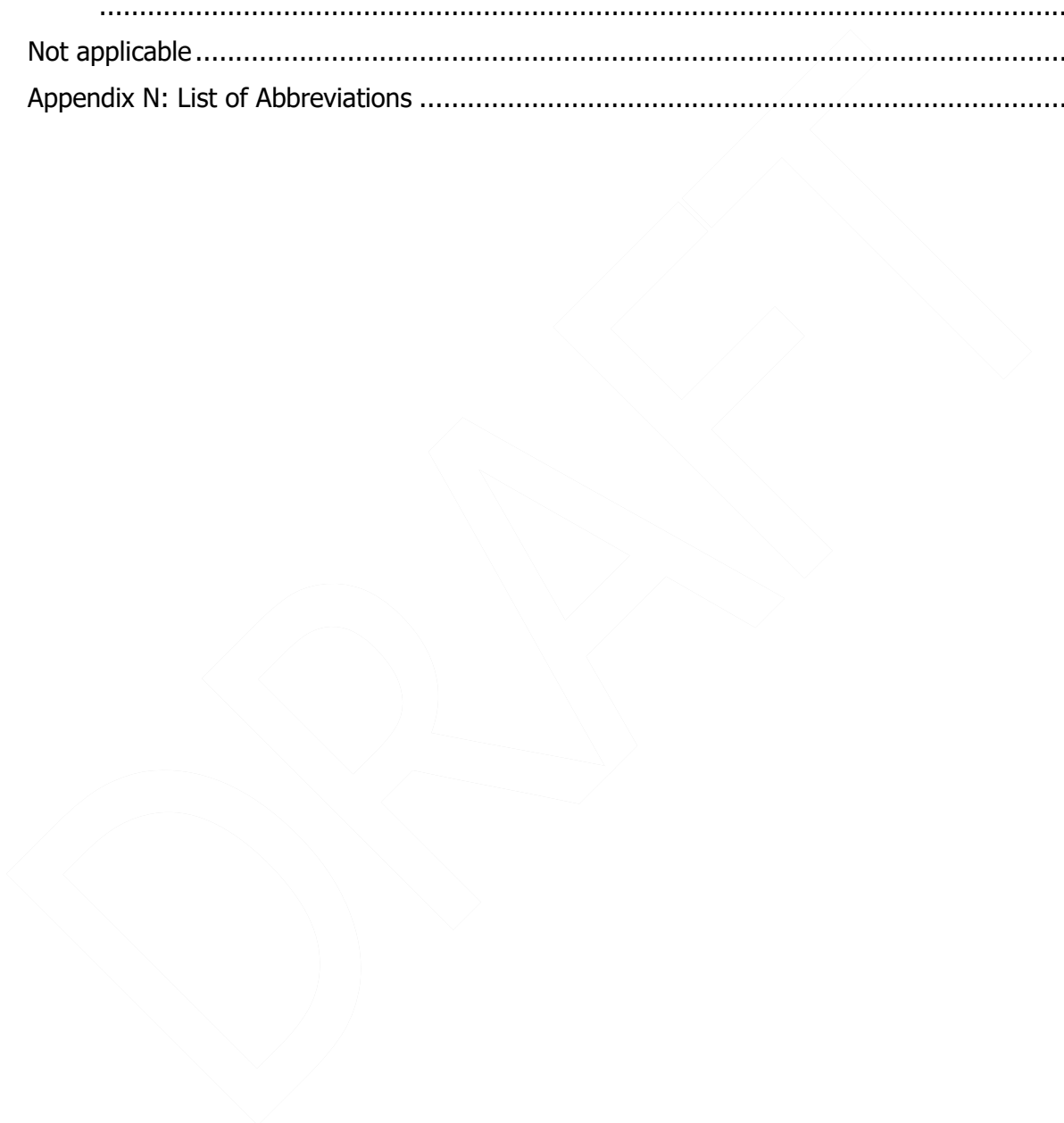
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|--|
| IOI Corporation Berhad |
| Head Office: IOI City Tower 2, Lebuhr IRC IOI Resort City 62502 Putrajaya, Malaysia |
| Certification Unit: Pamol Kluang Palm Oil Mill 8 1/2 Miles, Jalan Mersing Road 86007 Kluang Johor, Malaysia |

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Section 1: Scope of the Certification Assessment

| 1. Company Details | | | |
|---|---|---------------------------------|------------------|
| RSPO Membership Number | 2-0002-04-000-00 | Membership Approval Date | 17/05/2004 |
| Parent Company Name | IOI Corporation Berhad | | |
| Address | IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia | | |
| Subsidiary (Certification Unit Name) | Pamol Plantations Sdn Bhd | | |
| Address | Pamol Kluang Palm Oil Mill, 8 1/2 Miles, Jalan Mersing Road , 86007 Kluang, Johor, Malaysia | | |
| Contact Name | Mohd Saidani bin Dandan Satia | | |
| Website | www.ioigroup.com | E-mail | pmm@ioigroup.com |
| Telephone | +603-89478888 +607-7875171 | Facsimile | +603-89478888 |

| 2. Certification Information | | | |
|-------------------------------|--|------------------------------------|------------|
| Certificate Number | RSPO 547027 | Date of First Certification | 16/03/2010 |
| | | Certificate Start Date | 16/03/2015 |
| | | Certificate Expiry Date | 15/03/2020 |
| Scope of Certification | Palm Oil and Palm Kernel Production from Pamol Kluang Palm Oil Mill and Supply Base (Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang & Swee Lam Estate) | | |
| Applicable Standards | RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D) | | |

| 3. Other Certifications | | | |
|-------------------------|-------------|-----------------------|-------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| Nil | | | |

| 4. Location(s) of Mill & Supply Bases | | | |
|---------------------------------------|--|-----------------|------------------|
| Name (Mill / Supply Base) | Location [Map Reference #] | GPS Coordinates | |
| | | Latitude | Longitude |
| Pamol Kluang Palm Oil Mill | Pamol Kluang Oil Mill, 8 1/2 Miles, Jalan Mersing Road , 86007 Kluang, Johor, Malaysia | 2° 6' 39.5" N | 103° 23' 32.3" E |
| Pamol Timur Estate | Pamol Timur Estate , Jalan Kluang – Mersing, 86000 Kluang, Johor, Malaysia | 2° 6' 43.1" N | 103° 23' 8.3" E |

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| | | | |
|--------------------|---|----------------|------------------|
| Pamol Barat Estate | Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor, Malaysia | 2° 6' 46.9" N | 103° 20' 38.0" E |
| Mamor Estate | Mamor Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor, Malaysia | 2° 8' 43.1" N | 103° 18' 21.5" E |
| Unijaya Estate | Unijaya Estate, Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 8609 Kluang, Johor, Malaysia | 1° 56' 26.1" N | 103° 16' 41.5" E |
| Kahang Estate | Kahang Estate, Peti Surat 14, 86700 Kahang, Johor, Malaysia | 2° 19' 55.7" N | 103° 29' 51.8" E |
| Swee Lam Estate | Swee Lam Estate, K.B.107, 81000 Kulai, Johor, Malaysia | 1° 40' 29.0" N | 103° 39' 13.6" E |

5. Description of Supply Base

| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
|--------------------|--|----------|-----------------------------|-----------------|--------------|
| Pamol Timur Estate | 2,093 | 1.05 | 203.87 | 2,297.92 | 91.08 % |
| Pamol Barat Estate | 2,155 | 2.25 | 157.08 | 2,314.33 | 93.12 % |
| Mamor Estate | 2,074 | 41.33 | 110.15 | 2,225.48 | 93.19 % |
| Unijaya Estate | 1,172 | 1.73 | 86.77 | 1,260.50 | 92.98 % |
| Kahang Estate | 2,278 | 5.57 | 136.33 | 2,419.90 | 94.14 % |
| Swee Lam Estate | 1,100 | 6.08 | 54.88 | 1,160.96 | 94.75 % |
| Total | 10,872 | 58.01 | 749.08 | 11,679.09 | 93.09 % |

Remarks:

- 1) Reduction of 110 ha in Swee Lam Estate compared to last year due to hand over to Housing Property Development Department. Therefore, total planted and total area were decreased as compare to last year data.
- 2) Besides, replanting was carried out and caused the size of planted area, roads and drains changed.
- 3) Size of HCV increased as compared to last year data due to they had included the steep area in the estates as HCV area.

6. Plantings & Cycle

| Estate | Age (Years) | | | | | Mature** | Immature |
|--------------------|-------------|--------|---------|---------|---------|----------|----------|
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Pamol Timur Estate | 412 | 1239 | 442 | 0 | 0 | 1,681 | 412 |
| Pamol Barat Estate | 845 | 874 | 0 | 0 | 436 | 1,310 | 845 |
| Mamor Estate | 0 | 201 | 1521 | 352 | 0 | 2,074 | 0 |
| Unijaya Estate | 307 | 339 | 274 | 252 | 0 | 865 | 307 |

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| | | | | | | | |
|-------------------|-------|-------|-------|-----|-----|-------|-------|
| Kahang Estate | 0 | 364 | 1914 | 0 | 0 | 2,278 | 0 |
| Swee Lam Estate | 0 | 500 | 599 | 0 | 1 | 1,100 | 0 |
| Total (ha) | 1,564 | 3,517 | 4,750 | 604 | 437 | 9,308 | 1,564 |

| 7. Certified Tonnage of FFB (Own Certified Scope) | | | |
|--|---|--|---|
| Estate | Tonnage / year | | |
| | Estimated (March 2018 – February 2019) | Actual (December 2017 – October 2018) | Estimated (March 2019 – February 2020) |
| Pamol Timur Estate | 35,499.35 | 35,065.21 | 35,137.00 |
| Pamol Barat Estate | 29,687.62 | 24,527.91 | 27,722.00 |
| Mamor Estate | 59,526.19 | 45,546.13 | 61,974.00 |
| Unijaya Estate | 22,794.05 | 23,403.41 | 30,760.00 |
| Kahang Estate | 76,206.61 | 47,198.76 | 73,090.00 |
| Swee Lam Estate | 27,876.18 | 27,461.87 | 26,380.00 |
| Total | 251,590.00 | 203,203.29 | 255,063.00 |

| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | | | |
|---|---|--|--|
| Estate | Tonnage / year | | |
| | Estimated (March 2018 – February 2019) | Actual (December 2017 – October 2018) | Forecast (March 2019 – February 2020) |
| | N/A | N/A | N/A |
| | | | |
| | | | |
| | | | |
| Total | | | |

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| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | | | | |
|--|-------------------------------|---------------------------------------|---------------------------|---------------------------------------|
| Independent FFB Supplier | Tonnage / year | | | |
| | Estimated (Mar 18– Feb 19) | Actual (December 2017 – October 2018) | | Forecast (March 2019 – February 2020) |
| | | Dec 2017 – Feb 2018 | March 2018 – October 2018 | |
| | N/A | | | |
| Total | | | | |

| 10. Certified Tonnage | | | |
|--|--------------------------------|--|--|
| Mill Capacity: 60 MT/hr SCC Model: IP | Estimated (Mar 18 – Feb 19) | Actual (December 2017 – October 2018) | Forecast (March 2019 – February 2020) |
| | FFB | FFB | FFB |
| | 251,590.00 | 203,203.29 | 255,063.00 |
| | CPO (OER: 23.50 %) | CPO (OER: 23.79%) | CPO (OER: 23.5%) |
| | 59,124.00 | 48,348.48 | 59,939.81 |
| | PK (KER: 5.00 %) | PK (KER: 5.03%) | PK (KER: 5%) |
| | 12,580.00 | 10,228.71 | 12,753.15 |

| 11. Actual Sold Volume (CPO) (Dec 17-Oct 18) | | | | | |
|--|----------------|-------------------------|-----|--------------|-----------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| CPO (MT) | 37,149.77 | 0 | 0 | 5,662.35 | 42,812.12 |

| 12. Actual Sold Volume (PK) (Dec 17-Oct 18) | | | | | |
|---|----------------|-------------------------|-----|--------------|----------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| PK (MT) | 5,925.74 | 0 | 0 | 3,249.45 | 9,175.19 |

| 13. Actual Group certification Claims | | |
|--|---------------|-----------------------------|
| | Credit | Physical Volume (MT) |
| IS-CSPO | - | - |
| IS-CSPKO | - | - |
| IS-CSPKE | - | - |

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
 (ASI Accreditation Number: ASI-ACC-067)
 Unit 3, Level 10, Tower A
 The Vertical Business Suites, Bangsar South
 No. 8, Jalan Kerinchi
 59200 Kuala Lumpur
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 Nicholas Cheong: Nicholas.Cheong@bsigroup.com
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site initial assessment was conducted from 26 - 29/11/2018. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Pamol Timur & Unijaya Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criterias 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment

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- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix M.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

| Assessment Program | | | | | |
|--------------------------------------|-----------------------------------|---------------------------|---------------------------|---------------------------|---------------------------|
| Name (Mill / Supply Base) | Year 1 (Certification) | Year 2 (ASA 1) | Year 3 (ASA 2) | Year 4 (ASA 4) | Year 5 (ASA 5) |
| 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 26, 2019 - November 29, 2019

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Total No. of Mandays: 10 mandays (including 1 day for mill - SC audit)

2.2 BSI Assessment Team:

| Team Member Name | Role <i>(Team Leader or Team member)</i> | Qualifications <i>(Short description of the team members)</i> |
|-------------------------|--|---|
| Hu Ning Shing (HNS) | Team Leader | She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill. She is fluent in Bahasa Malaysia and English languages. |
| Mr Muhammad Fadzli (MF) | Team member | Fadzli graduated in Bachelor of Forestry Science at University Putra Malaysia. 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 & 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. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed on the aspects of legal, estate & mill best practices, environmental & waste management and workers consultation. He is fluent in Bahasa Malaysia and English languages. |
| Mahzan Munap (MM) | Team member | He holds a MBA from Ohio University and B Sc. in Petroleum Engineering from University of Missouri, USA. Collected over 370 days of auditing experience in OHSAS 18001 and MS 1722 OHSMS (72 days for palm oil miling and 8 days for oil palm plantation). CIMAH competent person with Malaysia Department of Occupational Safety and Health (DOSH) since 1997. An Occupational Safety and Health Trainer at INSTEP PETRONAS. Successfully completed RSPO Lead Assessor Course in 2008 and IRCA accredited Lead Assessor training for ISO 9001 and RABQSA/IRCA EMS Lead Assessor Course for ISO 14001 in 2008. During this assessment, he assessed on the aspects of legal, estate & mill best practices, safety & health, HCV and workers consultation. He is fluent in Bahasa Malaysia and English languages. |

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Accompanying Persons:

| No. | Name | Role |
|-----|------|------|
| | N/A | |

2.3 Assessment Plan

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

| Date | Time | Subjects | HNS | MF | MM |
|---|-------------|--|-----|----|----|
| Sunday 25/11/2018 | PM | Audit team travelling to Kluang | √ | √ | √ |
| Monday 26/11/2018 Pamol Kluang Palm Oil Mill | 0830 - 0900 | Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). Verification on previous audit findings. | √ | √ | √ |
| | 0900 - 1200 | Pamol Kluang Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area. | √ | √ | √ |
| | 1200 - 1300 | Lunch | √ | √ | √ |
| | 1300 - 1630 | Pamol Kluang Palm Oil Mill Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities. | √ | √ | √ |
| | 1630 - 1700 | Interim Closing Briefing | √ | √ | √ |
| Tuesday 27/11/2018 Pamol Timur Estate | 0830 - 1200 | Pamol Timur Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. | √ | √ | √ |
| | 1000 - 1200 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | √ | - | - |
| | 1200 - 1300 | Lunch | √ | √ | √ |

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| | | | | | |
|-------------------------|-------------|--|---|---|---|
| | 1300 - 1630 | Pamol Timur Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc). | √ | √ | √ |
| | 1630 - 1700 | Interim Closing Briefing | √ | √ | √ |
| Wednesday 28/11/2018 | 0830 - 1200 | Unijaya Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | √ | √ | √ |
| | 1200 - 1300 | Lunch | √ | √ | √ |
| | 1300 - 1630 | Unijaya Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ |
| | 1630 - 1700 | Interim Closing Briefing | √ | √ | √ |
| Thursday 29/11/2018 | 0830 - 1630 | Supply chain audit for Pamol Kluang POM <ul style="list-style-type: none"> • General COC for supply chain • RSPO rules communication and claim • Module D: Identity Preserved | √ | - | - |
| | 1630 - 1730 | Preparation of Closing Meeting and Closing Meeting | √ | - | - |
| | 0830 - 1630 | Supply chain audit for Pamol Kluang POM <ul style="list-style-type: none"> • General COC for supply chain • RSPO rules communication and claim • Module D: Identity Preserved | √ | - | - |
| | 1630 - 1730 | Preparation of Closing Meeting and Closing Meeting | √ | - | - |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- IOI Corporation Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014

RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

| Time Bound Plan | | |
|--|---|-------------------|
| Requirement | Remarks | Compliance |
| Summary of the Time Bound Plan | | |
| Does the plan include all subsidiaries, estates and mills? | Yes. | Complied |
| Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. | Yes. | Complied |
| Have there been any changes since the last audit? Are they justified? | Sugut Estate was included as part of the Pamol Sabah POM supply base and has been audited by certification body, Intertek on 12 th September 2017. Unico Desa POM-2 Sabah scheduled to undergo its first RSPO audit in 11 th – 15 th December 2017. | Complied |
| If there have been changes, what circumstances have occurred? | RSPO certification for Sugut Estate has been successfully granted being of November 2017. | Complied |
| Have there been any stakeholder comments? | No | Complied |
| Have there been any newly acquired subsidiaries? | No | Complied |
| Have there been any isolated lapses in implementation of the plan? | No | Complied |
| Un-Certified Units or Holdings | | |
| Did the company conduct an internal audit? If so, has a positive assurance statement been produced? | IOI has conducted an Internal audit on Uncertified Units to determine its compliance against clause 4.2.4 (Partial certification). The Internal audit reports had identified the issues involved, on-going corrective actions and monitoring. | Complied |
| No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High | PT KPAM Indonesia which is a new concession land sent HCV assessment report to HCVRN and received letter of satisfactory from HCVRN on 25 th November 2017. Currently undergoing peer review for HCS report. The NPP will be conducted upon | Complied |

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| | | |
|--|---|-----------------|
| <p>Conservation Values (HCVs).</p> <ul style="list-style-type: none"> Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. | <p>completion of all reports and will be posted on the RSPO for Public Consultation. The other three uncertified units under new concession land are PTSKS, PTBNS & PTBSS Indonesia still pending with the acquisition of Governmental 'Hak Guna Usaha' application which is still in progress. Besides, update on the RSPO Suspension and complaint by Aiden environment, IOI has submitted progress reports and RSPO has lifted</p> | |
| <p>Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.</p> | <p>PT KPAM Indonesia which is a new concession land sent HCV assessment report to HCVRN and received letter of satisfactory from HCVRN on 25th November 2017. Currently undergoing peer review for HCS report. The NPP will be conducted upon completion of all reports and will be posted on the RSPO for Public Consultation. The other three uncertified units under new concession land are PTSKS, PTBNS & PTBSS Indonesia still pending with the acquisition of Governmental 'Hak Guna Usaha' application which is still in progress.</p> | <p>Complied</p> |
| <p>Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.</p> | <p>New certification for IOI Pelita (Sarawak) is pending resolution of land dispute and RSPO decision. A settlement has not been reached on the issue, but progress is being made through continued engagement conducted by IOI Pelita, IOI Group and the Miri Residents' Office to reach an amicable settlement. In addition, IOI has proactively engaged further with grassroots and RSPO to ensure free and informed consent process when discussion with community is taking place. To further enhance our community engagement, a community communication officer has been appointed and is responsible to meet regularly with wider community and individual households to communicate and disseminate information.</p> | <p>Complied</p> |
| <p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.</p> | <p>In IOI Sustainable Palm Oil Policy under section 7 on transparency and wider engagement, we are committed to resolve complaints and conflicts effectively and responsibly through open transparent process upon agreed by affected stakeholders. Where internal grievance is submitted through estate green book.</p> | <p>Complied</p> |
| <p>Did the company conduct an internal audit? If so, has a positive assurance statement been produced?</p> | <p>Refer first remarks above</p> | <p>Complied</p> |
| <p>Any Legal non- compliance is being resolved in accordance with the legal requirements, with</p> | <p>None.</p> | <p>Complied</p> |

| | | |
|---|--|--|
| reference to RSPO criteria 2.1 and 2.2. | | |
|---|--|--|

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|---|----------------|------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? | Not applicable | |

3.4 Details of findings

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

During the annual surveillance assessment there were two (2) Major & two (2) Minor nonconformities raised. The Pamol Kluang Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

| Summary of Total Number of Nonconformity | | | |
|--|---|--|-----------------------------------|
| Nonconformity | | | |
| NCR Ref # | 1713476-201811-M1 | Clause & Category (Major / Minor) | RSPO SCCS - Indicator 5.3.2 Major |
| Date Issued | 29/11/2018 | Due Date | 28/02/2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 18/01/2019 |
| Statement of Nonconformity: | The written procedure for internal audit was not included the conformance of the requirements of RSPO Market Communications and Claims Documents and the coverage of internal audit was not comprehensive. | | |
| Requirement Reference: | The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. | | |

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| | ii) effectively implements and maintains the standard requirements within its organization |
| Objective Evidence: | <p>SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018) was developed to outline the process of internal audit and the internal audit needs to be carried out at least once a year which covered for RSPO SCCS requirements. However, the requirements of RSPO Market Communications and Claims has yet to be included into the procedure.</p> <p>Besides, Internal audit was carried out on 10/10/2018 for RSPO Supply Chain Certification. However, the audit was only covered the Module D: Identity Preserved. Requirements of Chain of Custody and RSPO Market Communications and Claims Documents have not been audited during the internal audit.</p> |
| Corrections: | <p>The SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies will be revised further.</p> <p>Another internal audit report covering RSPO Supply Chain Certification Standard (including Requirements of Chain of Custody and Module D) and RSPO Rules on Market Communication and Claims was developed.</p> <p>Please refer to Appendix 2 – Pamol Mill 2018 RSPO COC & SCCS Internal Audit Report.</p> |
| Root Cause Analysis: | <p>In the SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018), compliance to RSPO Rules on Market Communication and Claims was not specifically mentioned as it was already mentioned in item 4.1.10 which is about the uses of the RSPO trademark and claims.</p> <p>The internal audit was conducted based on RSPO Supply Chain Standards which covers items in Requirements of Chain of Custody and Module D and also based on RSPO Market Communications and Claims Document. However the RSPO Supply Chain Internal Audit Report was not comprehensive, whereby it just included Module D. This practice was deemed to be compliant as it was not disputed in the previous annual surveillance audits.</p> |
| Corrective Actions: | <p>The SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 08 dated 03/12/2018), has been revised by including compliance towards requirements of RSPO Rules on Market Communications and Claims. Please refer to Appendix 1 – RSPO SOP Mill Management System (Issue 8)</p> <p>A new internal audit report template covering RSPO Supply Chain Certification Standard (including Requirements of Chain of Custody and Module D) and RSPO Rules on Market Communication and Claims was developed. This format of audit report will be used for the upcoming internal audits and amendments will be made according to the updates on RSPO Supply Chain Certification Standard and RSPO Rules on Market Communication and Claims. Please refer to Appendix 3 - RSPO COC & SCCS Internal Audit Report Template</p> |
| Assessment Conclusion: | <p>The major non-conformance was carried out offsite due to the risk was low whereby the traceability was able to trace and no lapse of the supply chain. The</p> |

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| | <p>mill has implemented the system. The non-conformance was involved on the revised of documentation only.</p> <p>The SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies, Doc. No. RSPO/SOP/COC/3, Issue No. 08 dated 3/12/2018 was revised by incorporated the RSPO Market Communications and Claims into the procedure. Besides, a new template of Chain of Custody & Supply Chain Certification Internal Audit Report was developed where the requirements for Chain of Custody and RSPO Market Communications and Claims were included in the report. An internal audit has been carried out on 5/12/2018 based on the new template.</p> <p>The corrective action was effectively closed on 18/1/2019 by offsite due to the risk of system breakdown was very minimal. Continuous implemented will be further verified in the next assessment.</p> |
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| Nonconformity | | | |
|------------------------------------|---|--|-----------------------------------|
| NCR Ref # | 1713476-201811-M2 | Clause & Category (Major / Minor) | RSPO SCCS - Indicator 5.4.1 Major |
| Date Issued | 29/11/2018 | Due Date | 28/02/2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 28/02/2019 |
| Statement of Nonconformity: | The information on the Despatch Note for purchase of FFB was not available or insufficient. | | |
| Requirement Reference: | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number | | |
| Objective Evidence: | <p>Sampled of weighbridge tickets/ FFB consignment note/ Despatch note below found not following the minimum information:</p> <p>a. Kahang Estate and Mamor Estate did not included the Certified Sustainable FFB stamping and the RSPO Certificate Number was stated as SPO 547027 instead of RSPO 547027 in Despatch Number. (Despatch No.: 17071 and Despatch No.: 50103)</p> <p>b. Unijaya Estate did not included the RSPO Certificate Number and only mentioned the product as FFB in Despatch Number. (Despatch No.: 51269)</p> | | |

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| | <p>c. RSPO Certificate Number stated in Despatch Note of Swee Lam Estate was SPO 547027 instead of RSPO 547027. (Despatch No.: 58035)</p> |
| <p>Corrections:</p> | <p>All the Supply Chain Officers in the supply base estates are instructed to amend the information in their respective weighbridge tickets to include the following information:</p> <ol style="list-style-type: none"> 1. RSPO SCC number (RSPO 547027) 2. Product description with supply chain model (CSFFB/IP) |
| <p>Root Cause Analysis:</p> | <p>The weighbridge tickets issued in the estates, contain the following information:</p> <ul style="list-style-type: none"> • The name and address of the seller. • The loading/delivery date. • The date on which the documents were issued. • The quantity of the products delivered. • Supply Chain certificate number of the seller (SPO 547027) • A unique identification number (weighbridge ticket no.) <p>In addition to that a rubber stamp that are used to stamp at the back of the ticket contains the following information:</p> <ul style="list-style-type: none"> • The name and address of the buyer. • The name and address of the seller. • Description of the product (Sustainable Product : Fresh Fruit Bunch, FFB) • RSPO Supply Chain Certificate Number (SPO 547027) <p>The Supply Chain Certificate Number (SPO 547027) in both the ticket and stamp was not updated since 2015, thus it was following the old certificate number found in the certificate issued in 2015. The person in charge, Supply Chain Officers in the supply bases (estates) failed to amend this info in both the weighbridge ticket and rubber stamp, as they were not aware of the changes and also they were not highlighted during their training.</p> <p>Since Pamol Kluang mill and its supply bases held more than one sustainable production certifications (RSPO and ISCC) previously, thus to generally claim that the Fresh Fruit Bunches (FFB) from the estates are certified for both the certification standards and cater the requirements of both the certification standards, the information in rubber stamp just indicated, 'Sustainable Product : Fresh Fruit Bunch'.</p> |
| <p>Corrective Actions:</p> | <p>The information in the weighbridge ticket has been amended to include the following additional information:</p> <ol style="list-style-type: none"> 1. RSPO cert. number (RSPO 547027) 2. Product description with supply chain model (CSFFB/IP) <p>Please refer to :</p> <p>Appendix 1 - Swee Lam Estate weighbridge ticket Appendix 2 - Mamor Estate weighbridge ticket Appendix 3 - Unijaya Estate weighbridge ticket Appendix 4 - Kahang Estate weighbridge ticket</p> <p>A training has been conducted for all the Supply Chain Officers on "RSPO Supply Chain Certification Standards" and "RSPO Rules on Market Communication and Claims".</p> <p>Please refer to:</p> <p>Appendix 5 – Training Records (RSPO SCCS)</p> |

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| | At the same time, any updates on “RSPO Supply Chain Certification Standards” and “RSPO Rules on Market Communication Claims” will be communicated to all Supply Chain Officers in all sites during the first visit of annual internal audits and their compliance will be verified during the second visit of the internal audit. |
| Assessment Conclusion: | <p>The major non-conformance was carried out offsite due to the risk was low whereby the traceability was able to trace and no lapse of the supply chain. The mill has implemented the system. The non-conformance was involved on the revised of documentation only.</p> <p>Weighbridge tickets for the estates have been revised and submitted accordingly. Seen the weighbridge tickets (Appendix 1 - Swee Lam Estate weighbridge ticket, Appendix 2 - Mamor Estate weighbridge ticket Appendix 3 - Unijaya Estate weighbridge ticket and Appendix 4 - Kahang Estate weighbridge ticket) where all the information have been included. Besides, training on the Updates on RSPO SCCS, RSPO Rules on Market Communication & Claims was conducted on 10/1/2019 to all the managers, assistant managers, Auxiliary Post, laboratory supervisor and weighbridge operators. Seen the training record, Appendix 5 – Updates on RSPO SCCS RSPO Rules on Market Communication Claims.</p> <p>The corrective action was effectively closed on 18/1/2019 by offsite due to the risk of system breakdown was very minimal. Continuous implemented will be further verified in the next assessment.</p> |

| Nonconformity | | | |
|------------------------------------|--|--|-------------------------------------|
| NCR Ref # | 1713476-201811-N1 | Clause & Category (Major / Minor) | Indicator 2.2.2 Minor |
| Date Issued | 29/11/2018 | Due Date | Next Annual Surveillance Assessment |
| Closed (Yes / No) | No | Date of nonconformity Closure | N/A |
| Statement of Nonconformity: | The clauses of the below requirements were not adequately addressed. | | |
| Requirement Reference: | Legal boundaries shall be clearly demarcated and visibly maintained. | | |
| Objective Evidence: | Field visits at Unijaya Estate found the following: a) No boundary demarcation was sighted at Block 16A and a grassy patch/oil palm smallholder. b) Legal boundary demarcation was poorly visibly maintained at Block 16A and Vegetable farmer and at Block 94A and the same vegetable farmer. | | |
| Corrections: | a) After discussing with the smallholder, we came to a mutual verbal agreement to place back the boundary marking after the boundary trench. b) The frond and trenches are cleared by using JCB for better visibility of boundary marking and boundary upkeep programme is implemented for improvement. | | |
| Root Cause Analysis: | a) The marking was sighted at the boundary previously at the boundary with the smallholder (right after the boundary trench). After investigating with the | | |

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| | <p>smallholder, the smallholder removed the marking because it was placed at his land.</p> <p>b) The smallholder placed the frond at the boundary trench which causes the boundary marking to be poorly visible.</p> |
| Corrective Actions: | <p>a) To follow the boundary marking programme in order to maintain a good visible boundary marking.</p> <p>b) A programme to upkeep all the boundary marking is done for maintaining a good visibility on the estate boundary.</p> |
| Assessment Conclusion: | <p>Corrections and corrective actions accepted. Evidence and effectiveness of CAP will be verified in the next audit.</p> |

| Nonconformity | | | |
|------------------------------------|---|--|-------------------------------------|
| NCR Ref # | 1713476-201811-N2 | Clause & Category (Major / Minor) | Indicator 5.2.4 Minor |
| Date Issued | 29/11/2018 | Due Date | Next Annual Surveillance Assessment |
| Closed (Yes / No) | No | Date of nonconformity Closure | N/A |
| Statement of Nonconformity: | <p>The status of HCV monitoring was not reflective of actual sightings in the field and the sighting record (Monthly Monitoring Checklist – Buffer Zone) contradicts the age (brown colour fronds) of the fronds sighted.</p> | | |
| Requirement Reference: | <p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. | | |
| Objective Evidence: | <p>The monthly monitoring activities carried out at Palmol Timur Estate could have been thorough in the months of October and November 2018 (see their checklist form Monthly Monitoring Checklist – Buffer Zone) as Auditor’s sighting in the field on 27.11.18 found the brown fronds in two spots of the Buffer Zone area at Block PM-04A. This clearly demonstrates non-conformance against the requirement of item no. 7, Buffer Zone Signage, erected 100m away. Further trailing of the above non-conformance records sighted in the above two Monthly Monitoring Checklist showed “No Frond Stacking in the Buffer Zone” recorded in column Field: 09B1 confirmed as YES by the signature indicated in the column PIC Monitored and Recorded and PIC Verifier and Signature when they were not.</p> | | |
| Corrections: | <p>Immediate action was taken by removing the stacked fronds from buffer zone area.</p> | | |
| Root Cause Analysis: | <p>Harvesters are generally aware that pruned fronds are not supposed to be stacked within the buffer area. However, upon investigating Mr. Slamet, the harvester who worked in Block PM-04A and stacked the frond, it was found that he is having lack of awareness of not to stack pruned fronds in buffer zone area.</p> | | |
| Corrective Actions: | <p>A reminder letter was issued to the relevant personnel such as Mr. Hairul Fadly bin Abdullah (Field Supervisor), Mr. Medianris (Field Mandore) and Mr. Slamet (Harvester) to ensure this issue does not repeat again. Retraining on Buffer Zone</p> | | |

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| | practices has been conducted to improve harvester’s understanding on buffer zone practices. |
| Assessment Conclusion: | Corrections and corrective actions accepted. Evidence and effectiveness of CAP will be verified in the next audit. |

| Opportunity for Improvements | |
|-------------------------------------|--------------------|
| OFI # | Description |
| OFI 1 | Nil |

| Positive Findings | |
|--------------------------|--------------------|
| PF # | Description |
| PF 1 | Nil |

3.4.1 Status of Nonconformities Previously Identified and Observations

| Non-Conformity | | | |
|------------------------------------|---|--|--------------------------|
| NCR Ref # | 1559784-201712-M1 | Clause & Category (Major / Minor) | Indicator 4.1.1 Major |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 30/01/2018 |
| Statement of Nonconformity: | Implementation of the collective agreement was not effective. | | |
| Requirement Reference: | Standard Operating Procedures (SOPs) for estates and mills are documented. | | |
| Objective Evidence: | IOI Group has an agreement with AMESU for all staff (included non-clerical staff) with COG. No.: 069/2015, IOI Group of Companies/ AMESU Agreement, 2014 where the working hours for non-clerical staff is 48 hours and overtime shall be accordance to Employment Act. However, record reviewed on the Time Attendance Report on October 2017 and November 2017 for Weighbridge Operators (nonclerical staff) found that they worked for more than 16 hours per day continuously for a month. | | |
| Corrective Actions: | <ol style="list-style-type: none"> 1. A new male weighbridge operator has been hired and will commence work on 2nd January 2018 (see attached offer letter titled "Tawaran Sebagai Pekerja Am (Weighbridge)). 2. Applied for an increase in overtime hours above the permitted 104 hours, for all levels of workers in the mill. (Please see attachment application letter to JTK titled: "Memohon Permit Waktu Bekerja Melebiji 104 Jam"). 3. With the hiring of the new personnel, weighbridge operation will be on shifts. Only male operators will be on night shift duty. | | |
| Assessment Conclusion: | ASA1_4 verification The female worker was only work in morning shift after interviewed with her. Besides, male workers have been recruited as weighbridge operators through verified the master list of employees. The mill has also in the progress to apply overtime that exceeded 104 hours. Seen the application letter and correspondence with the Labour Office. The mill still waiting for approval from Labour Officer. | | |

| Non-Conformity |
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|------------------------------------|---|--|--------------------------|
| NCR Ref # | 1559784-201712-N1 | Clause & Category (Major / Minor) | Indicator 4.1.2 Minor |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 29/11/2018 |
| Statement of Nonconformity: | The Safe Operating Procedures for Scheduled Waste Storage (IOI-OSH 3.2.2; Revision 1) was not fully implemented. | | |
| Requirement Reference: | A mechanism to check consistent implementation of procedures shall be in place | | |
| Objective Evidence: | The scheduled waste store at Pamol Barat Estate does not comply with the IOI Corporation Berhad (Plantations) – Safe Operating Procedures (IOI-OSH 3.2.2; Revision 1) on the storage of scheduled wastes to ensure SW containers are always kept closed and the store must be kept locked. Sighted that the store was not gated/fenced/locked during site visit. | | |
| Corrective Actions: | The management has sent an order to purchase materials to fence up and lock the present storage area for spent lubricants (SW 305) and filters (SW 410). This storage area already has a roof, bund and concrete floor. The construction work will commence soon and expected to complete by 10th January 2018. | | |
| Assessment Conclusion: | ASA1_4 verification Verified during site visit at Pamol Kluang POM, Pamol Timur Estate and Unijaya Estate, it was noted that all the Scheduled Waste was stored in designated store. The store was store building is roofed, has contamination bund and lockable at all time. Only responsible person is authorized to enter the store. Liquid type scheduled waste container was kept in aluminum tray to prevent spillage during filling or disposing. | | |

| Opportunity for Improvement | |
|------------------------------------|--------------------|
| OFI# | Description |
| Nil | |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|---------------------------------|--------------------------|--------------------|------------------------------------|
| 1143838M1 | Major | 2.1.1 | 9/1/2015 | Closed on 2/4/2015 |
| 1143838M2 | Major | 2.2.1 | 9/1/2015 | Closed on 2/4/2015 |
| 1143838M3 | Major | 6.5.1 | 9/1/2015 | Closed on 2/4/2015 |
| 1143838N1 | Minor | 5.3.3 | 9/1/2015 | Closed on 17/12/2015 |
| 1279712M1 | Major | 2.1.1 | 15/12/2015 | Closed on 31/12/2015 |
| 1279712N1 | Minor | 2.1.4 | 15/12/2015 | Closed on 20/12/2016 |
| 1279712N2 | Minor | 4.1.3 | 15/12/2015 | Closed on 20/12/2016 |
| 1420891M1 | Major | 6.5.2 | 23/12/2016 | Closed on 7/2/2017 |
| 1420891M2 | Major | SCCS Module D 4.2 | 23/12/2016 | Closed on 7/2/2017 |
| 1420891M3 | Major | 4.6.11 | 23/12/2016 | Closed on 7/2/2017 |
| 1420891M4 | Major | 2.1.1 | 23/12/2016 | Closed on 7/2/2017 |
| 1420891N1 | Minor | 4.4.1 | 23/12/2016 | Closed on 15/12/2017 |
| 1420891N2 | Minor | 5.3.3 | 23/12/2016 | Closed on 15/12/2017 |
| 1559784-201712-M1 | Major | 4.1.1 | 15/12/2017 | Closed on 30/01/2018 |

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|-------------------|-------|--------------------|------------|----------------------|
| 1559784-201712-N1 | Minor | 4.1.2 | 15/12/2017 | Closed on 29/11/2018 |
| 1713476-201811-M1 | Major | RSPO SCCS 5.3.2 | 29/11/2018 | Closed on 18/1/2019 |
| 1713476-201811-M2 | Major | RSPO SCCS 5.4.1 | 29/11/2018 | Closed on 18/1/2019 |
| 1713476-201811-N1 | Minor | 2.2.2 | 29/11/2018 | "Open" |
| 1713476-201811-N2 | Minor | 5.2.4 | 29/11/2018 | "Open" |

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Pamol Kluang Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.


Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

| List of Stakeholders Contacted | |
|---|---|
| Internal Stakeholders Managers and Assistants Mill & Estate Male Mill Staff/ Workers Female Mill Staff/Workers Foreign Worker Male and Female Estate workers Workers Representatives | Union/Contractors/Local Communities Contractors Villager Kg Sri Tambak Smallholders |
| Government Departments Headmistress of SJKC Kg Gajah | NGO Nil |

| IS # | Description |
|------|--|
| 1 | Feedbacks: Smallholders – They felt gratitude to the management as they provided whatever assistant that requested by them. For eg: if their truck breaks down or stuck in the field, the management provided tractor to help the smallholders. Besides, the management also maintained the road that access by them. They have good relationship with the management and no land encroachment issue reported. |

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| | <p>Management Responses: The management will ensure the relationship between the management and smallholders is maintained.</p> <p>Audit Team Findings: No other issue.</p> |
| 2 | <p>Feedbacks: Workers’ Representatives – They informed that they have been paid as per the Minimum Wage Order 2016 and according to Employment Act 1955. They were paid double rate if worked on rest day. They were treated equally without discrimination and the company did not restrict their movement.</p> <p>Management Responses: The management will continue to ensure compliance with the legal requirements.</p> <p>Audit Team Findings: No further issue.</p> |
| 3 | <p>Feedbacks: Headmistress of SJKC Kg Gajah – She informed that the company’s management has maintained good relationship with the school management. Donation was given to the school whenever they requested for any activities. However, she reported that there was bad odour from the mill sometimes.</p> <p>Management Responses: The management has acknowledged the issue as there was complaints received during the stakeholder meeting. The management is in progress to install the biogas plant and polishing plant to rectify the issue.</p> <p>Audit Team Findings: Verified the CAPEX proposed by the management and this project will be on-going until next year. Therefore, this will be verified during next assessment.</p> |
| 4 | <p>Feedbacks: Contractors – They informed that they have signed an agreement prior to work and payment was made according to the terms stated in the agreement. They are aware of the complaint procedure as they have been briefed by the management.</p> <p>Management Responses: The management will make sure the payment is made promptly.</p> <p>Audit Team Findings: Verified the invoices and payment vouchers confirmed that payment was made promptly.</p> |
| 5 | <p>Feedbacks: Villager Kg Sri Tambak – He informed that no land dispute reported by the villagers. Trenches and marking were available to demarcate the boundaries. The villagers allow to visit the mosque inside the estate. Job opportunity was provided to local communities as well.</p> <p>Management Responses: The management will maintain good relationship with the local communities.</p> <p>Audit Team Findings: No other issue.</p> |

| Formal Signing-off of Assessment Conclusion and Recommendation | |
|---|---|
| <p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Pamol Kluang Palm Oil Mill Certification Unit has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Pamol Kluang Palm Oil Mill Certification Unit is continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Hu Ning Shing | Name: Ravi Tony |
| Company Name: BSI Services Malaysia Sdn Bhd | Company Name: IOI Plantation Services Sdn Bhd |
| Title: Lead Auditor | Title: Manager, Sustainability, Safety & Health Department (Peninsular) |
| Signature:  | Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  <p>IOI PLANTATION SERVICES SDN BHD Company No: 1050782-T Sustainability, Safety & Health Dept RAVI TONY MANAGER JKKP IS 127/438/2/1596</p> |
| Date: 25/01/2019 | Date: 25/01/2019 |

Appendix A: Summary of Findings

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|------------|
| Principle 1: Commitment to Transparency | | |
| Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | |
| 1.1.1 | <p>There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.</p> <p>- Minor compliance -</p> <p>The Pamol Kluang Palmol Certification Unit continued to use the 'Stakeholder Request Procedure' in its IOI Group Social Impact Assessment (SIA) Index 10.0. Adequate information covering environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. For example, through internal and external stakeholders' meeting, ECC meeting, Gender Committee meeting and etc. Publicly available documents such as land title, OSH plan, HCV documents, negotiation and compensation procedures, complaint records, RSPO public summary reports, EIA and SIA, Management Plans & Continuous Improvement Plans and company policies are available.</p> <p>The estates maintained lists of its stakeholders which included the neighbouring stakeholders, Government/Statutory Bodies, Banks, Suppliers and Contractors. The lists were updated in January 2018.</p> <p>In the offices of palm oil mill and estates assessed, all IOI's policies were seen displayed in dual language on their notice board.</p> | Complied |

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| Criterion / Indicator | Assessment Findings | | | | | Compliance | |
|--|---|---|---|---|--------------|------------|---------------|
| 1.1.2 | Records of requests for information and responses shall be maintained. -Major compliance - | | At the mill and in both the estates visited, all requests, complaints or suggestions from internal and external stakeholders related to social, cultural and economic issues and the responses were recorded in the Grievance/Complaints Book (Green Book). | | | Complied | |
| | | Latest records of requests for information and responses as noted are as follows: | | | | | |
| | | Entity | Requested party | Nature of grievance/ complaints | Date request | | Date response |
| | | Pamol Mill | Mill worker | Request for proper drainage system at ramp to prevent water overflow to the road. | 9.11.18 | | 13.11.18 |
| | | Pamol Timur Estate | Estate worker | Request for house roof repair | 5.10.18 | 9.10.18 | |
| | | Unijaya Estate | Estate worker | Workers complaint hall's fluorescent lamp need to be repaired | 14.9.18 | 17.9.18 | |
| Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. | | | | | | | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| 1.2.1 Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance - | Publicly available management documents such as land titles, OHS plans, EIA, SIA, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available and can be cross referred to their respective criterion. All operating units have individual documents and records to demonstrate compliance to this indicator. IOI Group documents are also accessible through their Group's website link: http://www.ioigroup.com . | Complied |
| Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions. | | |
| 1.3.1 There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance - | IOI Group has developed and implemented Code of Business Conduct & Ethics dated October 2012 where the people to uphold, at all times the IOI Core Values as below: <ol style="list-style-type: none"> a. Integrity b. Commitment c. Loyalty d. Excellence in Execution e. Speed or Timeliness f. Innovativeness g. Cost Efficiency The company employees shall not accept gifts, benefits or entertainment from a third party. Briefing was given to the workers on 9/11/2018 in Pamol Kluang POM, 13/7/2018 in Pamol Timur Estate and during external stakeholder meeting for external stakeholders. | Complied |
| Principle 2: Compliance with applicable laws and regulations | | |
| Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations. | | |

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| <p>2.1.1</p> | <p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p> | <p>The palm oil mill and estates visited continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and the sustainability team. The CU had obtained and renewed license and permits as required by the law.</p> <p>The licenses/permit viewed among others were:</p> <p>a) Pamol Kluang Palm Oil Mill</p> <ol style="list-style-type: none"> 1. MPOB licence no.: 500040104000 for processing 288,000 ton FFB valid from 1.4.2018 to 31.1.2019. 2. Energy commission license serial #006273/2018, installation #ST (SJB) P/S/JHR/00128 for 3400 kW valid until 10/08/2018. 3. Fire Certificate No.: 3030638, No. JBPM: JH/7/695/2018 valid from 29.10.2018 – 28.10.2019 4. SPAN Water Services Industry (Licencing) Regulation 2007, No.: SPAN/JKSP/PT/800-4(2)/9/09 valid from 31.5.2018 – 30.5.2019 5. River water extraction (BAKAJ) license no.: 08/A/KLG/055 (validity period until 31/12/2018) by Director of Water Resources Johor for usage quantity of 1700m3/day 6. Diesel license ref #BPGK/JH (KLU)0273 SK for 18,000 liter dated 28/02/2018 until 27/02/2019. 7. Firearms Licence, Serial no.:231937, KLG/A/1677 registered in the name of Mill Manager, valid from 4.6.2018 – 3.6.2019. <p><u>Competence persons:</u></p> <ol style="list-style-type: none"> a. FFB Grader: 1x serial no. MPOB-KKMBS-SE-70-2017 b. Steam engineer: 1 x 1st grade: No. 7473 c. Steam engine and boilerman certificate: 4 – 1x Grade 1 and 3x Grade2 d. Electrical charge man: 1x A4, PJ-T-4-H-0003-2002 and 1 x A1, PJ-T-B-0085-2012 e. AESP 5 Nos. (Cert. no. :NJ 0423-R expired on September 2019, NJ 0424-R, NJ 0431-R, NJ 0437-R and NJ 0442-R-all valid until February 2019). f. AGT 3 Nos. (NW-NJHR-AGT-R-0250-P) valid until 13/09/2019, (NJG1532-S valid until April 2020 and AGT004550-18 valid until July 2020. g. CePSWaM serial no.: CePSWaM/184675 expired August 2019 h. CePPOME serial no.: CEPPOME /184183 expired May 2019 <p>b) Pamol Timur Estate</p> <table border="1" data-bbox="657 1800 1289 1975"> <thead> <tr> <th>No.</th> <th>Licence / Permit / Regulatory Requirement</th> <th>Validity Period/Ref</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>JTK-Pemontongan Gaji – Insurans ref PP3/34/1069</td> <td>Effective 24/6/05</td> </tr> </tbody> </table> | No. | Licence / Permit / Regulatory Requirement | Validity Period/Ref | 1 | JTK-Pemontongan Gaji – Insurans ref PP3/34/1069 | Effective 24/6/05 | <p>Complied</p> |
|--------------|--|---|-----|---|---------------------|---|---|-------------------|-----------------|
| No. | Licence / Permit / Regulatory Requirement | Validity Period/Ref | | | | | | | |
| 1 | JTK-Pemontongan Gaji – Insurans ref PP3/34/1069 | Effective 24/6/05 | | | | | | | |

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|-----------------------|--|---|---------------------|------------|
| | 2 | MPOB-FFB menjual & mengalih ref no 504178602000 | 1/6/18-31/5/19 | |
| | 3 | KPDNKK – Diesel storage 18000 litres | 30/1/8-29/1/19 | |
| | 4 | Air compressor – JH PMT 13794 | 29/10/19 | |
| | 5 | Firearms – KLG/A/1566 | Effective 28/11/17 | |
| | c) Unijaya Estate | | | |
| | No. | Licence / Permit / Regulatory Requirement | Validity Period/Ref | |
| | 1 | JTK-Pemotongan Gaji – Insurans ref PP3/34/1069 | Effective 24/6/05 | |
| | 2 | MPOB-FFB menjual & mengalih ref no 504178602000 | 1/6/18-31/5/19 | |
| | 3 | KPDNKK – Diesel storage 18000 litres | 30/1/8-29/1/19 | |
| | 4 | Air compressor – JH PMT 13794 | 29/10/19 | |
| | 5 | Firearms – KLG/A/1566 | Effective 28/11/17 | |
| | <p>Pamol Timur Estate and Unijaya Estate has obtained permit for deduction of wages from Pejabat Tenaga Kerja Kluang and Jabatan Tenaga Kerja Semenanjung Malaysia as below:</p> <p>a. Serial No.: PP2/34/0071 valid from 1/10/2003 for advance and loan (PTE).</p> <p>b. Ref. No.: TK(NJ)U-23 dated 19/12/2017 for electricity (UE).</p> <p>Ref. No.: (8)dIm BHG. PU/9/129 Jld 21 dated 30/12/2015 for buffalo for whole IOI Corporation Berhad Semenanjung Malaysia.</p> | | | |

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|--|---|------------|
| 2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance - | <p>The Pamol Kluang Palm Oil Mill and the visited estates have identified and documented their legal register with written information on applicable legal requirements with respect to their operation. The record titled "<i>Legal Requirement Register</i>" based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills.</p> <p>Among the identified legal and other requirements includes;</p> <ul style="list-style-type: none"> a) Pesticides Act 1974 and Regulations, b) Environmental Quality Act and Regulations 1974, c) Factories and Machinery Act and Regulations, 1967 d) Electricity Supply Act 1990 e) Immigration Act 1959 f) Occupational Safety and Health Act 1994 g) Employment Act 1955 h) Industrial Relations Act 1967 i) Children and Young Persons (Employment) Act 1966 j) MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977 k) Industrial Code of Practice for Confined Space 2010. l) Personal Data Protection Act 2010 | Complied |
| 2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance - | <p>All estates assigned one executive each for the PIC for compliance and changes in the regulatory requirement. At Pamol Timur Estate and Unijaya Estate - the PIC is their Assistant Manager, respectively, En Mukhlis Mukhtar and Kamarol Ariffin B Haridon via letter dated 01/1/18 signed by their Estate Manager. The evaluation of licences and permits for estate was last reviewed on 31.12.2017.</p> | Complied |
| 2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance - | <p>The mechanism established for tracking changes in laws/regulations are through the following means;</p> <ul style="list-style-type: none"> a) Subscribed to Lexis-Nexis Malaysia b) News release through daily newspaper. c) Law change tracked by book publisher (MDC Book Publications). d) Circulars from relevant association (eg. MPOA, MPOB, MAPA) e) Internet (e-federal gazette, www.e-warta.com.my) <p>The IOI Legal Department from headquarters alert all operating units on legal updates. Process flow for the Legal updating is shown in SOP reviewed dated March 2018.</p> | Complied |
| <p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p> | | |

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| <p>2.2.1</p> | <p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -</p> | <p>Documents relating to land ownership such as land title and land lease are available. There is no change noted in the land ownership. All the land belongs to IOI. Sample sighted s follows:</p> <p>Pamol Kluang POM</p> <table border="1"> <thead> <tr> <th>Registered Owner</th> <th>Title No.</th> <th>Lot No.</th> <th>Area, ha</th> </tr> </thead> <tbody> <tr> <td>Pamol Plantations S/B</td> <td>G 88881</td> <td>2429</td> <td>4.10</td> </tr> </tbody> </table> <p>Pamol Timur Estate</p> <table border="1"> <tbody> <tr> <td>Pamol Plantations S/B</td> <td>G 90779</td> <td>2593</td> <td>396.81</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>G 90780</td> <td>2594</td> <td>407.22</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>G 94673</td> <td>2589</td> <td>839.55</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>G 88885</td> <td>2430</td> <td>649.14</td> </tr> </tbody> </table> <p>Unijaya Estate</p> <table border="1"> <tbody> <tr> <td>Pamol Plantations S/B</td> <td>GRN81092</td> <td>860</td> <td>6.1233</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN95132</td> <td>1934</td> <td>414.8027</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN89327</td> <td>1966</td> <td>6.6039</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN45559 2</td> <td>2554</td> <td>7.7699</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN50563 0</td> <td>2555</td> <td>7.1882</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN94164</td> <td>2586</td> <td>78.0790</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN94155</td> <td>2682</td> <td>19.1972</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN94155</td> <td>2682</td> <td>19.1972</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN94154</td> <td>2691</td> <td>8.7892</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN89048</td> <td>2733</td> <td>11.2047</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN83087</td> <td>2734</td> <td>24.8755</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN81205</td> <td>2735</td> <td>8.0330</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN81208</td> <td>2736</td> <td>8.7133</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN81210</td> <td>2738</td> <td>6.1054</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN83083</td> <td>2739</td> <td>7.6485</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN82019</td> <td>2744</td> <td>7.9470</td> </tr> <tr> <td>Pamol Plantations S/B</td> <td>GRN83694</td> <td>2749</td> <td>11.1794</td> </tr> </tbody> </table> | Registered Owner | Title No. | Lot No. | Area, ha | Pamol Plantations S/B | G 88881 | 2429 | 4.10 | Pamol Plantations S/B | G 90779 | 2593 | 396.81 | Pamol Plantations S/B | G 90780 | 2594 | 407.22 | Pamol Plantations S/B | G 94673 | 2589 | 839.55 | Pamol Plantations S/B | G 88885 | 2430 | 649.14 | Pamol Plantations S/B | GRN81092 | 860 | 6.1233 | Pamol Plantations S/B | GRN95132 | 1934 | 414.8027 | Pamol Plantations S/B | GRN89327 | 1966 | 6.6039 | Pamol Plantations S/B | GRN45559 2 | 2554 | 7.7699 | Pamol Plantations S/B | GRN50563 0 | 2555 | 7.1882 | Pamol Plantations S/B | GRN94164 | 2586 | 78.0790 | Pamol Plantations S/B | GRN94155 | 2682 | 19.1972 | Pamol Plantations S/B | GRN94155 | 2682 | 19.1972 | Pamol Plantations S/B | GRN94154 | 2691 | 8.7892 | Pamol Plantations S/B | GRN89048 | 2733 | 11.2047 | Pamol Plantations S/B | GRN83087 | 2734 | 24.8755 | Pamol Plantations S/B | GRN81205 | 2735 | 8.0330 | Pamol Plantations S/B | GRN81208 | 2736 | 8.7133 | Pamol Plantations S/B | GRN81210 | 2738 | 6.1054 | Pamol Plantations S/B | GRN83083 | 2739 | 7.6485 | Pamol Plantations S/B | GRN82019 | 2744 | 7.9470 | Pamol Plantations S/B | GRN83694 | 2749 | 11.1794 | <p>Complied</p> |
|-----------------------|--|---|------------------|-----------|---------|----------|-----------------------|---------|------|------|-----------------------|---------|------|--------|-----------------------|---------|------|--------|-----------------------|---------|------|--------|-----------------------|---------|------|--------|-----------------------|----------|-----|--------|-----------------------|----------|------|----------|-----------------------|----------|------|--------|-----------------------|------------|------|--------|-----------------------|------------|------|--------|-----------------------|----------|------|---------|-----------------------|----------|------|---------|-----------------------|----------|------|---------|-----------------------|----------|------|--------|-----------------------|----------|------|---------|-----------------------|----------|------|---------|-----------------------|----------|------|--------|-----------------------|----------|------|--------|-----------------------|----------|------|--------|-----------------------|----------|------|--------|-----------------------|----------|------|--------|-----------------------|----------|------|---------|-----------------|
| Registered Owner | Title No. | Lot No. | Area, ha | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | G 88881 | 2429 | 4.10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | G 90779 | 2593 | 396.81 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | G 90780 | 2594 | 407.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | G 94673 | 2589 | 839.55 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | G 88885 | 2430 | 649.14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN81092 | 860 | 6.1233 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN95132 | 1934 | 414.8027 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN89327 | 1966 | 6.6039 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN45559 2 | 2554 | 7.7699 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN50563 0 | 2555 | 7.1882 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN94164 | 2586 | 78.0790 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN94155 | 2682 | 19.1972 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN94155 | 2682 | 19.1972 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN94154 | 2691 | 8.7892 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN89048 | 2733 | 11.2047 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN83087 | 2734 | 24.8755 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN81205 | 2735 | 8.0330 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN81208 | 2736 | 8.7133 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN81210 | 2738 | 6.1054 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN83083 | 2739 | 7.6485 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN82019 | 2744 | 7.9470 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Plantations S/B | GRN83694 | 2749 | 11.1794 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | Unijaya Estate had the most land title, hence the above records were taken based on random sample. However, the entire land title was checked and found in compliance to the legislative requirement. | |
| 2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance - | Boundary markers were sighted installed at Pamol Timur estate, boundary marker point P09E with neighbouring smallholder (Mr. Khoo). However, field visit at Unijaya Estate found the following: a) No boundary demarcation was sighted at Block 16A and a grassy patch/oil palm smallholder. b) Legal boundary demarcation was poorly visibly maintained at Block 16A and a vegetable farmer and at Block 94A and the same vegetable farmer. Hence, a minor non-conformity has been raised. | Minor nonconformance |
| 2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance - | There is no land dispute in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as trenches were constructed to demarcate the boundaries. | Complied |
| 2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. - Major compliance - | There is no land dispute in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as trenches were constructed to demarcate the boundaries. | Complied |
| 2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance - | There is no land dispute in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as trenches were constructed to demarcate the boundaries. | Complied |
| 2.2.6 To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. - Major compliance - | There is no land dispute in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as trenches were constructed to demarcate the boundaries. | Complied |
| Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent. | | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| 2.3.1 Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance - | The estate lands are legally owned by Pamol Plantations Sdn Bhd which is subsidiary of IOI Corporation Berhad. The existing estates are not encumbered by any customary land rights. Seen the boundary stones map demarcated by the management. Interview with the villagers and smallholders found that no land encroachment issues. The management has maintained clear boundaries and trenches between the plantations and other stakeholders. | Complied |
| 2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance - | The company has developed IOI Peninsular Malaysia Negotiation Procedure through Free Prior & Informed Consent (FPIC) to ensure the negotiation and compensation processes are in two-way communication. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any customary land rights. Land titles and ownerships of the lands were available. | Complied |
| 2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance - | The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any customary land rights. Land titles and ownerships of the lands were available. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as trenches were constructed to demarcate the boundaries. | Complied |
| 2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. - Major compliance - | The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any customary land rights. Land titles and ownerships of the lands were available. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as trenches were constructed to demarcate the boundaries. | Complied |

Principle 3: Commitment to long-term economic and financial viability

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|------------|
| Criterion 3.1: | | |
| There is an implemented management plan that aims to achieve long-term economic and financial viability. | | |
| 3.1.1 | <p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -</p> <p>Pamol Kluang POM and supply base has established business plan in the form of annual budget and 5 Years Business Management Plan FY 2018 - 2022 as guidance for future planning.</p> <p><u>PKPOM</u></p> <p>Pamol Kluang POM has established business plan in the form of annual budget and 5 Years Business Management Plan FY 2018 - 2022 as guidance for future planning. The plan was established as basis for the company and operating units to conduct the business. The business plan covers on FFB production, CPO, OER, and KER, general charges, mill maintenance, process shift labour, general services, and total processing cost. It also covers environment, social (workers and staffs welfare), and health and safety component.</p> <p>The mill also have shown commitment to conserve environment and comply with DOE regulation. The mill planned for new CAPEX in FY 2018/19:</p> <ul style="list-style-type: none"> i. Biogas Plant ii. Polishing Plant iii. Boiler Emission Control Systems <p><u>PTE</u></p> <p>Pamol Timur Estate and Unijaya Estate has established annual business plan in the form of annual budget and 5 Years Business Management Plan FY 2018 - 2022 as guidance for future planning. The plan was established as basis for the company and operating units to conduct the business. The business plan covers on the FFB production, 10 years replanting Program, executive/staff and workers requirement, Mature oil palm costing statement and CAPEX. It also covers environment, social (workers and staffs welfare), and health and safety component.</p> <p><u>PTE</u></p> <p>The estate planned for new CAPEX in FY 2018/19:</p> <ul style="list-style-type: none"> i. Water Tank with Platform 1200 galon ii. Stainless Steel Mini Trailer. <p><u>UJE</u></p> <ul style="list-style-type: none"> i. 300MT fertiliser store ii. Refurbished of staff quarters iii. Workshop parking bay <p>The estate also included welfare activity for their workers in the budget such as family day, sports and recreational activity and filtered water vending machine.</p> | Complied |

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|--|---|-----------------|
| <p>3.1.2</p> <p>An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.</p> <p>- Minor compliance -</p> | <p>IOI Group practices replanting program is for palm ages at 25 years and above and depends on the yield of the field. The replanting program is reviewed on annually basis.</p> <p><u>PTE</u> No replanting program for the next 5 years as the company practice for replanting is for palm ages 25 years and above and depends on the yield of the field. The oldest palm in the estate planted in 1999.</p> <p><u>UJE</u> Sighted the Long Range Replanting Program 2017/18 – 2026/27. Replanting program for the next 5 years as follows: i. 2018/19 – NIL ii. 2019/20 – 121.00 ha for field PM94A, PM 94B, PM 94C iii. 2020/21 – 131.00 ha for field PM95A, PM95B iv. 2021/22 – NIL v. 2022/23 - NIL</p> | <p>Complied</p> |
| <p>Principle 4: Use of appropriate best practices by growers and millers</p> | | |
| <p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p> | | |
| <p>4.1.1</p> <p>Standard Operating Procedures (SOPs) for estates and mills are documented</p> <p>- Major compliance -</p> | <p>IOI Group has established standard operation procedure as guidance for all operating units to conduct daily operation. The SOP covers on the operations safety procedure.</p> <p><u>Pamol Kluang POM</u> The mill hold 2 SOP as guidance to conduct the mill daily operation. IOI has established Group Standard Operating Procedures as guidance document to operate the mill issued on 1/7/2017 issue no 02. The SOP covers all 17 station in the mill such as FFB Reception, Sterilizer, Threshing, Oil Room, Laboratory, Biogas Plant, Boiler, Engine Room and workshop.</p> <p>The mill also holds Operation and Safety IOI Group Palm Oil Mill. The SOP covers all station and activities. Latest update was for Nut and Kernel Plant issue no 2 dated 14/7/2018 and 'Tingkah Laku Semasa Bekerja (umum)' dated 16/7/2018.</p> <p><u>PTE and UJE</u> The estate hold 3 SOP as guidance to conduct the estate daily operation. IOI has established Group Standard Operating Procedures as guidance document to operate the estate issued on 1/7/2017 issue no 02. The SOP covers all 17 activities such as Seed Production, Planting Techniques, Manuring, Weeding, Pest and Disease, Harvesting and Planting of Beneficial Plants. The estate also follow the Group Agricultural Policy revised in July 2005 as guidance to conduct daily estate operation. For guidance of safety, the estate follows Occupational Safety and Health Manual issued on 1/8/2015.</p> | <p>Complied</p> |

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| <p>4.1.2</p> <p>A mechanism to check consistent implementation of procedures shall be in place.</p> <p>- Minor compliance -</p> | <p>IOI Group has established mechanism to check the consistent of implementation of SOP through periodically inspection, visit and internal audit by the management and Sustainability Department.</p> <p><u>PKPOM</u></p> <p>The latest Internal Audit was conducted by the Sustainability, Safety & Health Department (Peninsular) on 10/10/2018. Issued raised during the internal audit has been addressed by the mill management and verified by the Sustainability, Safety & Health Department.</p> <p>Visiting Sr. Manager/Mill Controller latest report on visit dated 24-25/4/2018 was available for review. All issue raised during the visit was addressed by the mill management.</p> <p><u>PTE</u></p> <p>The latest Internal Audit for RSPO and MSPO was conducted by the Sustainability, Safety & Health Department (Peninsular) on 10/10/2018. Safety and Health officer Internal Audit was conducted on 24/10/2017. Issued raised during the internal audit has been addressed by the mill management and verified by the Sustainability, Safety & Health Department.</p> <p>As the estate using Buffalo Assisted Harvesting, routine vaccination and deworming for buffaloes was done on 23/9/2018 by Pejabat Perkhidmatan Veterinar Daerah Kluang. Sighted the vaccination records for 40 buffaloes.</p> <p><u>UJE</u></p> <p>The latest Internal Audit for RSPO and MSPO was conducted by the Sustainability, Safety & Health Department (Peninsular) on 1/10/2018. Safety and Health officer Internal Audit was conducted on 3/10/2017. Issued raised during the internal audit has been addressed by the mill management and verified by the Sustainability, Safety & Health Department.</p> <p>As the estate using Buffalo Assisted Harvesting, routine vaccination and deworming for buffaloes was done on 27/11/2018 by Pejabat Perkhidmatan Veterinar Daerah Kluang. Sighted the vaccination records for 31 buffaloes.</p> | <p>Complied</p> |

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|--|---|-----------------|
| <p>4.1.3</p> <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p> | <p>All operating units visited maintain all reports of monitoring (VSM/Mill Controller/Plantation Controller reports and internal Audit report) and the document are available for review. Issues raised during the visit/audit were addressed by the mill/estate management and revert back to the respective parties.</p> <p><u>PKPOM</u> The Internal Audit reports for Pamol Kluang POM available for review. Issued raised during the internal audit has been addressed by the mill management and verified by the Sustainability, Safety & Health Department.</p> <p>Visiting Sr. Manager/Mill Controller was documented in Management Visiting Book and available for review. All issue raised during the visit was addressed by the mill management.</p> <p><u>PTE</u> Internal Audit Report and verification audit report for RSPO, MSPO and Safety were available for review. Issued raised during the internal audit has been addressed by the mill management and verified by the Sustainability, Safety & Health Department on 9/11/2018.</p> <p>The veterinar visit report was kept in the Veterinar Visit file and available for review.</p> <p><u>UJE</u> Internal Audit Report and verification audit report for RSPO, MSPO and Safety were available for review. Issued raised during the internal audit has been addressed by the mill management and verified by the Sustainability, Safety & Health Department.</p> <p>The estate has taken action on the issue highlighted during the Plantation Controller has been addressed as per reply letter dated 12/10/2018.</p> <p>The veterinar visit report was kept in the Veterinar Visit book and available for review</p> | <p>Complied</p> |
| <p>4.1.4</p> <p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -</p> | <p>No FFB sourced from third-party. The FFB is from own company estates.</p> | <p>Complied</p> |
| <p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p> | | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|-----------------|
| <p>4.2.1</p> <p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.</p> <p>- Minor compliance -</p> | <p>Good agriculture practices from the SOP are followed to manage soil fertility to ensure optimal and sustained yield through annual fertilizer application program.</p> <p>Beside in- organic fertilizer, organic fertilizer in the form of POME and EFB is applied as per recommendation from IOI Research Centre. Documented procedure, Agriculture Policies dated July 2005 covers for all estate operations under specific section as per below:</p> <ul style="list-style-type: none"> 1.0 Land Clearing, Preparation and Planting 2.0 Nursery Practice 3.0 Planting Density and Technique 4.0 Soil Conservation and Terracing 5.0 Establishment and Maintenance of Legume Covers 6.0 Weeding: Weed Control 7.0 Ablation 8.0 Manuring 9.0 Pest and Disease 10.0 Roads 11.0 Pruning 12.0 Harvesting <p>Good agriculture practices from the SOP are followed to manage soil fertility to ensure optimal and sustained yield through annual fertilizer application program. Beside in-organic fertilizer, organic fertilizer in the form of POME and EFB is applied as per recommendation from IOI Research Centre.</p> | <p>Complied</p> |

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| <p>4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -</p> | <p>Fertiliser recommendation was base on foliar and soil analysis conducted on annually basis by the Agronomist. The application was conducted as per agronomist recommendation and Agricultural Policy.</p> <p><u>PTE</u> Sighted the fertiliser application records for FY 2018 as follows:</p> <p>Month program: Jul 18 Field: PM99A Type: NK Compact Rate/palm: 3.25 kg/palm Month applied: 6-7/8/2018</p> <p>Month program: Sep 18 Field: PM09A Type: BRP Rate/palm: 1.25 kg/palm Month applied: 5-6/10/2018</p> <p>The delayed on application was due to unavailability of the fertilizer and unfavorable wet weather for manuring activity to prevent leaching of fertilizer.</p> <p><u>UJE</u> Sighted the fertiliser application records for FY 2018 as follows:</p> <p>Month program: Jul 18 Field: PM10A Type: NK Compact Rate/palm: 3.50 kg/palm Month applied: 15-17/8/2018</p> <p>Month program: Jul 18 Field: PM98A Type: NK Compact Rate/palm: 3.25 kg/palm Month applied: 8-10/10/2018</p> | <p>Complied</p> |

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| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|-------------------------|-------------------------|--------|---------|--------|---------|--------|---------|-------|-------|-------------------------|--------|----------------|---------|--------|----------------|---------|--------|----------------|---------|-------|-------------------------|--------|-------|--------|--------|--------|-------|-----------------|
| <p>4.2.3</p> <p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -</p> | <p>Agronomist from Pamol Research Station recommended the fertilizer recommendation base on foliar and soil analysis which conducted on annually basis. The foliar and soil analysis report was documented in the Oil Palm Fertilizer Recommendation Report.</p> <p><u>PTE</u> Latest leaf sampling and soil sampling analysis was conducted in April 2017. The leaf nutrient status and soil nutrient analysis report was documented in Oil Palm Fertilizer Recommendation Report FY 2018 dated 10/8/2018.</p> <p><u>UJE</u> Latest leaf sampling and soil sampling analysis was conducted in Feb 2017. The leaf nutrient status and soil nutrient analysis report was documented in Oil Palm Fertilizer Recommendation Report FY 2018 dated 13/8/2018.</p> | <p>Complied</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.2.4</p> <p>A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -</p> | <p>All palm by-products such as EFB were recycled. Sighted the records for dispatch of EFB as follows:</p> <table border="1" data-bbox="660 1043 1257 1227"> <thead> <tr> <th>Month</th> <th>EFB – Field Application</th> </tr> </thead> <tbody> <tr> <td>Aug 18</td> <td>2375.12</td> </tr> <tr> <td>Sep 18</td> <td>2860.82</td> </tr> <tr> <td>Oct 19</td> <td>2378.97</td> </tr> </tbody> </table> <p><u>PTE</u> The EFB application for mature area was recommended at 40 ton/ha/year as per IOI Group Agriculture Policy, Section 8.8 Utilization of Oil Palm By-Products. Sighted the EFB application as follows</p> <table border="1" data-bbox="660 1451 1283 1635"> <thead> <tr> <th>Month</th> <th>Field</th> <th>EFB – Field Application</th> </tr> </thead> <tbody> <tr> <td>Aug 18</td> <td>PM 02B, PM 01B</td> <td>1208.49</td> </tr> <tr> <td>Sep 18</td> <td>PM 01B, PM 01A</td> <td>1523.09</td> </tr> <tr> <td>Oct 18</td> <td>PM 01B, PM 99A</td> <td>1272.94</td> </tr> </tbody> </table> <p><u>UJE</u></p> <table border="1" data-bbox="660 1724 1289 1908"> <thead> <tr> <th>Month</th> <th>EFB – Field Application</th> </tr> </thead> <tbody> <tr> <td>Aug 18</td> <td>30.32</td> </tr> <tr> <td>Sep 18</td> <td>159.24</td> </tr> <tr> <td>Oct 19</td> <td>16.92</td> </tr> </tbody> </table> | Month | EFB – Field Application | Aug 18 | 2375.12 | Sep 18 | 2860.82 | Oct 19 | 2378.97 | Month | Field | EFB – Field Application | Aug 18 | PM 02B, PM 01B | 1208.49 | Sep 18 | PM 01B, PM 01A | 1523.09 | Oct 18 | PM 01B, PM 99A | 1272.94 | Month | EFB – Field Application | Aug 18 | 30.32 | Sep 18 | 159.24 | Oct 19 | 16.92 | <p>Complied</p> |
| Month | EFB – Field Application | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 18 | 2375.12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep 18 | 2860.82 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 19 | 2378.97 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | Field | EFB – Field Application | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 18 | PM 02B, PM 01B | 1208.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep 18 | PM 01B, PM 01A | 1523.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 18 | PM 01B, PM 99A | 1272.94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | EFB – Field Application | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 18 | 30.32 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep 18 | 159.24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 19 | 16.92 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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

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| 4.3.1 | Maps of any fragile soils shall be available. - Major compliance - | Soil series map available for both estate visited. No other soil categorized as problematic or fragile soil. <u>PTE</u> No fragile soil identified at the estate. Main soil series in the estate identified as Bungor, Segamat, Tai Tak, Gajah Mati, Rengam, Durian and Gong Chenak. <u>UJE</u> No fragile soil identified at the estate. Main soil series in the estate identified as Rengam, Colluvium, Malacca, Batu Lapan, Local Alluvium, Lating, Kuala Brang, Gajah Mati and Kuah. | Complied |
| 4.3.2 | A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance - | Management strategy for plantings on slope and steep hill documented under Group Environmental Impact Assessment and management plan, under 7.0: Soil erosion and prevention plan, sub clause 7.1.7: Planting on steep hills. Planting strategy on LCC planting is recommended and minimize damage on natural vegetation along the terrace slope. Other guidance document: Group Standard Operating Procedures (StOPs) for Estate Operations under 2.0: Standard Procedure for Land Preparation for the New Planting and Replanting. | Complied |
| 4.3.3 | A road maintenance programme shall be in place. - Minor compliance - | Both estates has established road maintenance program. The monitoring was conducted on monthly basis. <u>PTE</u> Estate has established road maintenance program focusing on road grading. Sighted the road maintenance record. Sighted the Road Maintenance Program records for FY2018/19. The estate has completed the road grading at field PM12. <u>UJE</u> Estate has established road maintenance program focusing on road grading. Sighted the Road Maintenance Program records for FY2018/19. As at todate the estate has completed 2309.10 chains of road grading. | Complied |
| 4.3.4 | Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance - | No other soil categorized as problematic or fragile soil such as peat soil identified in the estate visited. | Complied |
| 4.3.5 | Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance - | No other soil categorized as problematic or fragile soil such as peat soil identified in the estate visited. | Complied |
| 4.3.6 | A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance - | No other soil categorized as problematic or fragile soil such as peat soil identified in the estate visited. | Complied |
| Criterion 4.4: Practices maintain the quality and availability of surface and ground water. | | | |

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| <p>4.4.1</p> | <p>An implemented water management plan shall be in place. - Minor compliance -</p> | <p><u>Pamol Kluang POM</u> Water management plan for Pamol POM dated 13/11/2017. The water management plan in the POM is more towards water pollution prevention and to some extent domestic usage. The objective of the water management plan are: 1. To minimize impact of drought and floods to the POM and estate operations, 2. To minimize the impact of drought to the oil palm yield, 3. To optimize the use of rain water and fresh water from streams, 4. Maximizing use of pollutants and waste (eq. effluent and EFB from oil mill)</p> <p>The Pamol POM has installed 10 units of flow meter to record the daily water usage from Pamol Timur, Pamol Barat and mill's domestic and processing purpose. Water was pumped from Semberong river daily for 24 hours. Pamol Kluang POM rainfall to-date (11/12/2017) is 1,345.79 mm.</p> <p><u>Swee Lam Estate</u> Water management plan for Swee Lam Estate dated 11/11/2017 was sighted. The estate extracts water from its own water catchment ponds. The water from catchment pond goes to treatment pond for treatment and sedimentation. The treated water is supplied to the line site for domestic usage. Water quality monitoring is conducted by the external consultant every six months once to ensure that drinking water quality test is within the Malaysian standards limit. Swee Lam Estate rainfall to-date (Jan – Nov 2017) is 3,067.00 mm.</p> <p><u>Pamol Barat Estate</u> Water management plan for Swee Lam Estate dated 11/11/2017 was sighted. The estate receives government water from Syarikat Air Johor (SAJ) for domestic use. IOI Research Centre selects rivers that run through each estate for Water Quality Index (WQI) study for the purpose of ensuring that the natural water quality is maintained. Pamol Barat Estate rainfall to-date (Jan – Nov 2017) is 2,509.50 mm.</p> <p>Pamol Kluang POM and supply base has established water management plan and reviewed annually. The objective of the water management plan as follows: i. To maximize the efficiency of use and renewability of the water source ii. Ensure that the use and management of water by the operation does not result in adverse impacts on the other users within the water catchment area iii. Avoid contamination of surface and ground water through run-off soil, nutrients or chemicals</p> | <p>Complied</p> |
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| |  | <p>iv. Aim to ensure that the plantations activities do not cause adverse impacts to the water sources of local communities, workers and their families</p> <p>v. To monitor outgoing water into main natural waterways which may have negative impacts due to estates or mill practices</p> <p>vi. To monitor the rainfall data for proper water management</p> <p>vii. to avoid water drainage into protected areas wherever possible. Appropriate mitigation measures shall be implemented following consultation with relevant stakeholders</p> <p><u>Pamol Kluang POM</u> Mill has established Water Management Plan reviewed to manage the water source utilized by this operating centre. Latest review conducted on 19/10/2018.</p> <p>Sighted the implementation as follows: i. River water monitoring was conducted on monthly basis. Sighted the report for the month of a. Jul 18, ref no. W/1807/13593 – conform to NWQS class III b. Aug 18, ref no. ENV/RIVERWATER/PAMOL/082 – conform to NWQS class III c. Sep 18, ref no. ENV/RIVER/PAMOL/087 – conform to NWQS class III</p> <p>ii. Rainfall monitoring was conducted on daily basis. Todate rainfall as at Oct 2018 was at 1587.77 mm.</p> <p><u>PTE</u> Estate has established Water Management Plan and reviewed on annually basis. Latest review was conducted on 17/10/2018. The management plan focusing on soil moisture conservation and conservation of water source.</p> <p>Sighted the implementation as follows: i. Sighted during site visit, the buffer zone was clearly demarcated with red colour ring at the palm trunk. No evidence of chemical application activity along the buffer zone. Training was given to the sprayer, latest training was conducted on 22/2/2018. Noted during interview with spraying gang at PM11A shows the understanding of prohibition of chemical application at the buffer zone area. ii. River water monitoring was conducted on annually basis. The sampled was taken from stream in the estate that flows into Sg. Sembrong and send to IOI Research Centre for analysis. The latest sampling was carried out on 12/7/2018. Refer report no. PTE/01/08/2018. The result shows non-conformity to NWQS class III as the NH3N result is higher. The estate has identified the manuring application as the root cause of the issue and has given refresher training to all the fertiliser applicator on manuring at the bufferzone on 14/11/2018.</p> <p><u>UJE</u></p> | |
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| | <p>Estate has established Water Management Plan and reviewed on annually basis. Latest review was conducted on 17/10/2018. The management plan focusing on soil moisture conservation and conservation of water source.</p> <p>Sighted the implementation as follows:</p> <p>i. Sighted during site visit, the buffer zone was clearly demarcated with red colour ring at the palm trunk. No evidence of chemical application activity along the buffer zone. Training was given to the sprayer and manurer, latest training was conducted on 9/2/2018. Noted during interview with spraying gang at PM11A shows the understanding of prohibition of chemical application at the buffer zone area.</p> | |



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| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | |
|---|---|-------------|-------------|-------------|-----------|-----------------|-----------|-----------------|-----------|----------------|-----------|------------|----------|-------------------------|-----------|-----------------|
| <p>4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p> | <p>IOI group has established riparian buffer zone distance as per Department of Irrigation and Drainage department and documented in HCV Assessment Report as follows:</p> <table border="1" data-bbox="660 495 1289 815"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> <tr> <td>> 3 meters (Sabah only)</td> <td>20 meters</td> </tr> </tbody> </table> <p><u>Pamol Kluang POM</u></p> <p>River water monitoring was conducted on monthly basis. Analysis was conducted by Env Consultancy and Monitoring Services. Sighted the report for the month of</p> <ol style="list-style-type: none"> i. Jul 18, ref no. W/1807/13593 – conform to NWQS class III ii. Aug 18, ref no. ENV/RIVERWATER/PAMOL/082 – conform to NWQS class III iii. Sep 18, ref no. ENV/RIVER/PAMOL/087 – conform to NWQS class III <p><u>PTE</u></p> <p>River water monitoring was conducted on annually basis. The sampled was taken from stream in the estate that flows into Sg. Sembrong and send to IOI Research Centre for analysis. The latest sampling was carried out on 19/7/2018. Refer report no. UJE/25/08/2018. The result shows non-conformity to NWQS class III as the NH3N result is higher. The estate has identified the manuring application as the root cause of the issue and has given refresher training to all the fertiliser applicator on manuring at the buffer zone on 14/11/2018.</p> <p><u>UJE</u></p> <p>River water monitoring was conducted on annually basis. The sampled was taken from stream in the estate that flows in the estate. The sampled was send to IOI Research Centre for analysis. The latest sampling was carried out on 12/7/2018. Refer report no. PTE/01/08/2018. The result shows non-conformity to NWQS class III as the NH3N result is higher compare to standard. However the results was not due to the activity in the estate as the results show from upstream to downstream shows reducing result of NH3N from class IV standard to class III standard.</p> | River width | Buffer zone | > 40 meters | 50 meters | 20 to 40 meters | 40 meters | 10 to 20 meters | 20 meters | 5 to 10 meters | 10 meters | < 5 meters | 5 meters | > 3 meters (Sabah only) | 20 meters | <p>Complied</p> |
| River width | Buffer zone | | | | | | | | | | | | | | | |
| > 40 meters | 50 meters | | | | | | | | | | | | | | | |
| 20 to 40 meters | 40 meters | | | | | | | | | | | | | | | |
| 10 to 20 meters | 20 meters | | | | | | | | | | | | | | | |
| 5 to 10 meters | 10 meters | | | | | | | | | | | | | | | |
| < 5 meters | 5 meters | | | | | | | | | | | | | | | |
| > 3 meters (Sabah only) | 20 meters | | | | | | | | | | | | | | | |

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|---|--|------------|---------------|---------|------------|-----|-----|------|---------------|----|------|----------|-------|-----|-----|------|---------------|----|------|----------|-------|------|-----|-----|---------------|----|------|----------|-------|-------|-----------|---------|------------|-----|-----|-----|---------------|----|------|----------|------|-----|-----|-----|---------------|----|------|----------|-----|-----|-----|-----|---------------|----|-----|----------|-------|-----------------|
| <p>4.4.3</p> <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -</p> | <p>Treated POME discharge was regularly monitored as prescribed under "Jadual Pematuhan". Regular monitoring was done on monthly basis and submitted to DOE on quarterly basis via quarterly return form. As the day of audit, the mill sing 100% furrow system for POME treatment. The mill has notify DOE through letter dated 24/9/2018. Refer letter no DOE/MS/3818.</p> <p>Noted the following 2nd and 3rd quarter report:-</p> <p>2nd Quarter</p> <table border="1" data-bbox="651 707 1284 1171"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> <th>Report No.</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Apr</td> <td>BOD</td> <td>4730</td> <td rowspan="3">EF/0142/12/18</td> </tr> <tr> <td>pH</td> <td>7.40</td> </tr> <tr> <td>S. Solid</td> <td>37700</td> </tr> <tr> <td rowspan="3">May</td> <td>BOD</td> <td>4140</td> <td rowspan="3">EF/0142/14/18</td> </tr> <tr> <td>pH</td> <td>7.20</td> </tr> <tr> <td>S. Solid</td> <td>38760</td> </tr> <tr> <td rowspan="3">June</td> <td>BOD</td> <td>240</td> <td rowspan="3">EF/0142/16/18</td> </tr> <tr> <td>pH</td> <td>8.20</td> </tr> <tr> <td>S. Solid</td> <td>11350</td> </tr> </tbody> </table> <p>3rd quarter</p> <table border="1" data-bbox="651 1261 1284 1724"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> <th>Report No.</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Jul</td> <td>BOD</td> <td>148</td> <td rowspan="3">EF/0142/18/18</td> </tr> <tr> <td>pH</td> <td>8.30</td> </tr> <tr> <td>S. Solid</td> <td>2570</td> </tr> <tr> <td rowspan="3">Aug</td> <td>BOD</td> <td>135</td> <td rowspan="3">EF/0142/20/18</td> </tr> <tr> <td>pH</td> <td>7.70</td> </tr> <tr> <td>S. Solid</td> <td>910</td> </tr> <tr> <td rowspan="3">Sep</td> <td>BOD</td> <td>208</td> <td rowspan="3">EF/0142/26/18</td> </tr> <tr> <td>pH</td> <td>7.0</td> </tr> <tr> <td>S. Solid</td> <td>13210</td> </tr> </tbody> </table> <p>All results were complied with 'Jadual Pematuhan' for effluent treatment through furrow systems.</p> | Month | Parameter | Results | Report No. | Apr | BOD | 4730 | EF/0142/12/18 | pH | 7.40 | S. Solid | 37700 | May | BOD | 4140 | EF/0142/14/18 | pH | 7.20 | S. Solid | 38760 | June | BOD | 240 | EF/0142/16/18 | pH | 8.20 | S. Solid | 11350 | Month | Parameter | Results | Report No. | Jul | BOD | 148 | EF/0142/18/18 | pH | 8.30 | S. Solid | 2570 | Aug | BOD | 135 | EF/0142/20/18 | pH | 7.70 | S. Solid | 910 | Sep | BOD | 208 | EF/0142/26/18 | pH | 7.0 | S. Solid | 13210 | <p>Complied</p> |
| Month | Parameter | Results | Report No. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr | BOD | 4730 | EF/0142/12/18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | pH | 7.40 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | S. Solid | 37700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | BOD | 4140 | EF/0142/14/18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | pH | 7.20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | S. Solid | 38760 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| June | BOD | 240 | EF/0142/16/18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | pH | 8.20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | S. Solid | 11350 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | Parameter | Results | Report No. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul | BOD | 148 | EF/0142/18/18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | pH | 8.30 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | S. Solid | 2570 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug | BOD | 135 | EF/0142/20/18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | pH | 7.70 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | S. Solid | 910 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep | BOD | 208 | EF/0142/26/18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | pH | 7.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | S. Solid | 13210 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|--|---|---|------------|-----------------------|--------|------|--------|------|--------|------|--------|------|--------|------|--------|------|----------|
| 4.4.4 | Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance - | <p>PKPOM monitored the water consumption per CPO produced on monthly basis. The records were available for review. Sighted the sampled records of water consumption as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Water consumption/CPO</th> </tr> </thead> <tbody> <tr> <td>May 18</td> <td>3.32</td> </tr> <tr> <td>Jun 18</td> <td>3.38</td> </tr> <tr> <td>Jul 18</td> <td>5.85</td> </tr> <tr> <td>Aug 18</td> <td>3.56</td> </tr> <tr> <td>Sep 18</td> <td>3.72</td> </tr> <tr> <td>Oct 18</td> <td>3.28</td> </tr> </tbody> </table> <p>Water consumption for the FY 2017: Water consumption/CPO : 3.59/CPO produced</p> | Month | Water consumption/CPO | May 18 | 3.32 | Jun 18 | 3.38 | Jul 18 | 5.85 | Aug 18 | 3.56 | Sep 18 | 3.72 | Oct 18 | 3.28 | Complied |
| Month | Water consumption/CPO | | | | | | | | | | | | | | | | |
| May 18 | 3.32 | | | | | | | | | | | | | | | | |
| Jun 18 | 3.38 | | | | | | | | | | | | | | | | |
| Jul 18 | 5.85 | | | | | | | | | | | | | | | | |
| Aug 18 | 3.56 | | | | | | | | | | | | | | | | |
| Sep 18 | 3.72 | | | | | | | | | | | | | | | | |
| Oct 18 | 3.28 | | | | | | | | | | | | | | | | |
| <p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p> | | | | | | | | | | | | | | | | | |
| 4.5.1 | Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance - | <p><u>PTE</u></p> <p>The estate has established IPM plan and documented in Pest Reduction Plan, Barn Owl Implementation Program and Beneficial Implementation Program.</p> <p>Sighted the implementation of the IPM plans as follows:</p> <p>i. Barn own census was conducted on quarterly basis. Current Barn Owl Box ratio is at 1:10 ha. Census result for the 2nd quarter and 3rd quarter shows the increase number of percentage of occupied BOB at 49% in 2nd quarter and 56% in 3rd quarter. The census result was submitted to Plantation Department.</p> <p>ii. Sighted the records of planting of beneficial plant available for review. Sighted during site visit the planting of Cassia, Tunera and Atigonon along the road at PM11A and PM09C.</p> <p><u>UJE</u></p> <p>The estate has established IPM plan and documented in Pest Reduction Plan, Barn Owl Implementation Program and Beneficial Plant Program.</p> <p>Sighted the implementation of the IPM plans as follows:</p> <p>i. Barn own census was conducted on quarterly basis. Current Barn Owl Box ratio is at 1:21 ha. Census result as October 2018, occupancy rate recorded at 40%. The census result was submitted to Head Office.</p> <p>ii. Sighted the records of planting of beneficial plant available for review. Sighted during site visit the planting of Cassia, Tunera and Atigonon along the road at P11A and P10A.</p> | Complied | | | | | | | | | | | | | | |

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|--|--|--|--------------|--------------------|--------------------|--------------|------------|----------|------------------------|---------------------------------|--------------------|---|-----------------------|----------|----------|
| 4.5.2 | Training of those involved in IPM implementation shall be demonstrated. - Minor compliance - | <p>IPM training has been provided by the plantation executives to the field supervisor, mandore and workers.</p> <p><u>PTE</u></p> <p>Interview with the mandore shows the understanding on the benefits of IPM implementation in the estate. Sighted the latest training records as follows:</p> <ul style="list-style-type: none"> i. IPM Management – beneficial plant dated 30/8/2018 ii. IPM Management – rat census and baiting dated 17/8/2018 iii. IPM Management – barn owl management dated 5/9/2018 <p><u>UJE</u></p> <p>Interview with mandore, field supervisor and sprayers shows the understanding on the implementation and benefits of beneficial plants in the estate. Sighted the latest training records as follows:</p> <ul style="list-style-type: none"> i. Rat Census and Baiting training dated 18/8/2018 ii. IPM Management – Barn Owl Management training dated 30/8/2018 iii. IPM Management – Beneficial Plant training dated 17/8/2018 | Complied | | | | | | | | | | | | |
| Criterion 4.6: | | | | | | | | | | | | | | | |
| Pesticides are used in ways that do not endanger health or the environment | | | | | | | | | | | | | | | |
| 4.6.1 | Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance - | <p>Justification of all pesticides used in the weeding and pest and disease were documented in Agriculture Policies dated July 2005 under section 6.0 Weeding: Weed Control and 9.0 Pest and Diseases. Stated under table 6.2: general Guidelines of Herbicide Mixture for Circle and Path under Shade</p> <table border="1"> <thead> <tr> <th>Target Weeds</th> <th>Active Ingredients</th> <th>Rate per ha (L/Ha)</th> </tr> </thead> <tbody> <tr> <td>Soft Grasses</td> <td>Glyphosate</td> <td>1.5 L/Ha</td> </tr> <tr> <td>Grasses, Broadleaf LCC</td> <td>Glyphosate + Metsulfuron Methyl</td> <td>1.5 L/Ha + 75 g/Ha</td> </tr> <tr> <td>Broadspectrum (mostly grasses, creepers, Asystasia)</td> <td>Glyphosate + Fluoxpyr</td> <td>2.0 L/Ha</td> </tr> </tbody> </table> | Target Weeds | Active Ingredients | Rate per ha (L/Ha) | Soft Grasses | Glyphosate | 1.5 L/Ha | Grasses, Broadleaf LCC | Glyphosate + Metsulfuron Methyl | 1.5 L/Ha + 75 g/Ha | Broadspectrum (mostly grasses, creepers, Asystasia) | Glyphosate + Fluoxpyr | 2.0 L/Ha | Complied |
| Target Weeds | Active Ingredients | Rate per ha (L/Ha) | | | | | | | | | | | | | |
| Soft Grasses | Glyphosate | 1.5 L/Ha | | | | | | | | | | | | | |
| Grasses, Broadleaf LCC | Glyphosate + Metsulfuron Methyl | 1.5 L/Ha + 75 g/Ha | | | | | | | | | | | | | |
| Broadspectrum (mostly grasses, creepers, Asystasia) | Glyphosate + Fluoxpyr | 2.0 L/Ha | | | | | | | | | | | | | |

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|-----------------------|--|--|----------------|-------------|--|------------|---------------------------------|--|----------------|--|-------------|-------------|-------------|-------------|-----|------|------|------|------|-----|------|------|------|------|-----|------|------|------|------|----------|
| 4.6.2 | Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance - | Estates visited monitored the usage of pesticides monthly and recorded in Pesticides usage/ha. Observed the pesticides usage records as follows: <table border="1" data-bbox="657 488 1289 779"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">PTETRICLOPYR BUTOXY ETHYL ESTER</th> <th colspan="2">ISOPROPYLAMINE</th> </tr> <tr> <th>PTE FY 2017</th> <th>UJE FY 2018</th> <th>PTE FY 2017</th> <th>UJE FY 2018</th> </tr> </thead> <tbody> <tr> <td>Aug</td> <td>0.02</td> <td>0.08</td> <td>0.16</td> <td>0.23</td> </tr> <tr> <td>Sep</td> <td>0.07</td> <td>0.00</td> <td>0.20</td> <td>0.28</td> </tr> <tr> <td>Oct</td> <td>0.08</td> <td>0.09</td> <td>0.30</td> <td>0.29</td> </tr> </tbody> </table> | | | | | PTETRICLOPYR BUTOXY ETHYL ESTER | | ISOPROPYLAMINE | | PTE FY 2017 | UJE FY 2018 | PTE FY 2017 | UJE FY 2018 | Aug | 0.02 | 0.08 | 0.16 | 0.23 | Sep | 0.07 | 0.00 | 0.20 | 0.28 | Oct | 0.08 | 0.09 | 0.30 | 0.29 | Complied |
| | PTETRICLOPYR BUTOXY ETHYL ESTER | | ISOPROPYLAMINE | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | PTE FY 2017 | UJE FY 2018 | PTE FY 2017 | UJE FY 2018 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug | 0.02 | 0.08 | 0.16 | 0.23 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep | 0.07 | 0.00 | 0.20 | 0.28 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct | 0.08 | 0.09 | 0.30 | 0.29 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.3 | Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance - | No prophylactic use of pesticides noted during the field visit and records verification. The estates have established the Chemical and Fertiliser reduction plan and reviewed on annually basis. The latest review was conducted on 14/11/2018. | | | | Complied | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.4 | Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance - | Paraquat is totally banned in IOI estate. Refer to memo/letter by Group Plantation Director, dated 23/9/10 effective by 31/12/11. All estates eliminated the use of Paraquat. Alternatives agrochemicals such as Metsulfuron Methyl and Glyphosate Isopropylamine used to control weeds. | | | | Complied | | | | | | | | | | | | | | | | | | | | | | | | |

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|---|---|-----------------|
| <p>4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -</p> | <p><u>PTE</u> Pesticides operators has been provided with proper PPE. Observed during the site visit the PPE usage by the operators such as google, half face respirator, nitrile hand glove, rubber boot and apron. The operators has been given training regarding the usage safety and health issue and proper way for chemical application. Noted during the interview with the sprayer shows the understanding on the safety procedure in the estate. Sighted the training records for the pesticides operators as follows: i. Chemical spraying SOP training dated 25/10/2018 ii. Chemical mixing SOP training dated 27/10/2018 iii. Scheduled waste store management dated 27/10/2018 iv. Fertiliser application (manual and mechanisation) date 30/10/2018</p> <p><u>UJE</u> Pesticides operators has been provided with proper PPE. Observed during interview shows the understanding on importance of PPE used. Sighted the PPE issuance records for all sprayers interviewed. Sighted the PPE checklist for manure and sprayers for the month of October and November 2018. The operators has been given training regarding the usage safety and health issue and proper way for chemical application. Noted during the interview with the sprayer shows the understanding on the safety procedure in the estate. Sighted the training records for the pesticides operators as follows: i. Safety Operating Procedure training dated 19/4/2018 ii. Safety Operating Procedure on Chemical Mixing and empty Container Management dated 26/3/2018 iii. Safety Operating Procedure for Chemical Store Management dated 26/3/2018</p> | <p>Complied</p> |
| <p>4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -</p> | <p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.</p> | <p>Complied</p> |
| <p>4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -</p> | <p>Pesticides had been applied using the Best Management Practices that minimize risk and impacts. The pesticide operators found to understand the use of the right nozzle, spray drift, spray quality and run-off.</p> | <p>Complied</p> |

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|---|---|------------|
| 4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance - | No pesticides applied aerially. | Complied |
| 4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance - | There is no associated smallholder at estates visited. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures. | Complied |
| 4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance - | Noted during interview with the employee shows the understanding of proper disposal of domestic waste, prohibition of waste burning and reduce, reuse and recycle of waste in the estate. The proper waste disposal was communicated to the employee through briefing and signage ant the linesite. | Complied |
| 4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance - | Annual medical surveillance conducted in August 2018 for 9 Sprayers and 6 Fertilizer Applicators were demonstrated. All workers tested were found fit for work. The medical examination was conducted by Klinik Rengam by DOSH Registered OHD (HQ/08/DOC/00/597). | Complied |
| 4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance - | No female sprayers were employed at Pamol Timur Estate and Unijaya Estate. | Complied |
| Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following: | | |

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| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|---------------------------|-----|---|-----------------------------------|---------------|---|----------------------|---------------|---|--|-------------------------------|---|------------------------------|--|---|--------------------------------------|---------------|---|---|----------|---|--|-----|---|--|--------------------|---|--|--------------------|----|--|--------------------------|-----------------|
| <p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p> | <p>The CU continued practicing Occupational Safety, Health and Hygiene in its daily operations fulfilling the spirit of the Policy signed by the Plantation Director dated 3/3/2018. The policy had been communicated to all employees through briefings and hardcopy of policies were seen displayed at the estates notice boards.</p> <p>Among the commitment contain tin the policy are:</p> <ul style="list-style-type: none"> i) Comply to all national laws and regulations. ii) Assess all health and safety risks to work activities. iii) Conduct regular inspection at workers houses. iv) Investigate and find causes of accidents and take appropriate measures to prevent recurrence. v) Prepare emergency procedures for foreseeable major accidents/incidents. <p>A safety and health plan (2018) for each estate and mill had been established and implemented. It is being monitored monthly for its effectiveness by the Safety & Health (SH) Manager, head office.</p> <table border="1" data-bbox="660 996 1270 1736"> <thead> <tr> <th>No.</th> <th>Safety and health program</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Safety & Health Committee Meeting</td> <td>S&H Committee</td> </tr> <tr> <td>2</td> <td>Workplace Inspection</td> <td>S&H Committee</td> </tr> <tr> <td>3</td> <td>Workers Health Surveillance (Sprayers, Manurers, Drivers, Workshop personnel, Water treatment operators)</td> <td>Estate Health Assistant (EHA)</td> </tr> <tr> <td>4</td> <td>Workers Medical Surveillance</td> <td>Asst. Manager / EHA / Sustainability Supervisor (SS)</td> </tr> <tr> <td>5</td> <td>Emergency / Fire Drill for all staff</td> <td>Asst. Manager</td> </tr> <tr> <td>6</td> <td>Fire fighting equipment inspection (extinguisher)</td> <td>SS / EHA</td> </tr> <tr> <td>7</td> <td>First aid box inspection and replenishment</td> <td>EHA</td> </tr> <tr> <td>8</td> <td>Certificated equipment Renewal from DOSH</td> <td>Asst. Manager / SS</td> </tr> <tr> <td>9</td> <td>Induction for new workers (before commencing work)</td> <td>Asst. Manager / SS</td> </tr> <tr> <td>10</td> <td>Personal Protective Equipment Training</td> <td>Asst. Manager / Supplier</td> </tr> </tbody> </table> | No. | Safety and health program | PIC | 1 | Safety & Health Committee Meeting | S&H Committee | 2 | Workplace Inspection | S&H Committee | 3 | Workers Health Surveillance (Sprayers, Manurers, Drivers, Workshop personnel, Water treatment operators) | Estate Health Assistant (EHA) | 4 | Workers Medical Surveillance | Asst. Manager / EHA / Sustainability Supervisor (SS) | 5 | Emergency / Fire Drill for all staff | Asst. Manager | 6 | Fire fighting equipment inspection (extinguisher) | SS / EHA | 7 | First aid box inspection and replenishment | EHA | 8 | Certificated equipment Renewal from DOSH | Asst. Manager / SS | 9 | Induction for new workers (before commencing work) | Asst. Manager / SS | 10 | Personal Protective Equipment Training | Asst. Manager / Supplier | <p>Complied</p> |
| No. | Safety and health program | PIC | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Safety & Health Committee Meeting | S&H Committee | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Workplace Inspection | S&H Committee | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Workers Health Surveillance (Sprayers, Manurers, Drivers, Workshop personnel, Water treatment operators) | Estate Health Assistant (EHA) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Workers Medical Surveillance | Asst. Manager / EHA / Sustainability Supervisor (SS) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Emergency / Fire Drill for all staff | Asst. Manager | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Fire fighting equipment inspection (extinguisher) | SS / EHA | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | First aid box inspection and replenishment | EHA | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Certificated equipment Renewal from DOSH | Asst. Manager / SS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Induction for new workers (before commencing work) | Asst. Manager / SS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Personal Protective Equipment Training | Asst. Manager / Supplier | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|---|---|------------|----------------------------|--|----------------------------|---|---------------|---|-------------------|---|------------|---|----------------------|---|-----------|---|------------|---|------------------------|---|----------------|---|----------|---|---------|---|------------------------------|---|------------------|---|--------------|---|------------------|---|--------------------------|---|--------------------------|---|-----------------------|---|-----------------|----|------------------|----|---------------|----|-------------|----|--------------------|----|--------------------|----|---------------------|-----------------|
| <p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p> | <p>The hazard identification, risk assessment and risk control had been carried out covering activities both at the estates and mill. Updated HIRARC register dated was presented during the assessment. Reviewed and updated of the health and safety risk assessments was carried out annually through HIRARC assessment assisted by the SH Manager. Latest review at Estates was carried out on 6/2/2018 and at Kluang Palmol POM, overall on 15/9/2018 and following the occurrence of the latest accident on 27/11/2018.</p> <p>The significant and routine activities were found adequately covered at both mill and estates assessed. Among those sighted were:</p> <table border="1" data-bbox="659 824 1270 1395"> <thead> <tr> <th></th> <th>Areas/Activities (Mill)</th> <th></th> <th>Areas /Activities (Estate)</th> </tr> </thead> <tbody> <tr><td>1</td><td>FFB Reception</td><td>1</td><td>Chemical spraying</td></tr> <tr><td>2</td><td>Sterilizer</td><td>2</td><td>Collection – buffalo</td></tr> <tr><td>3</td><td>Threshing</td><td>3</td><td>Harvesting</td></tr> <tr><td>4</td><td>Digestion and Pressing</td><td>4</td><td>Chemical store</td></tr> <tr><td>5</td><td>Oil Room</td><td>5</td><td>Pruning</td></tr> <tr><td>6</td><td>Product Storage and despatch</td><td>6</td><td>Road maintenance</td></tr> <tr><td>7</td><td>Biogas Plant</td><td>7</td><td>Electrical works</td></tr> <tr><td>8</td><td>Effluent Treatment Plant</td><td>8</td><td>Transporting FFB to mill</td></tr> <tr><td>9</td><td>Water Treatment Plant</td><td>9</td><td>Tractor driving</td></tr> <tr><td>10</td><td>Boiler Operation</td><td>10</td><td>Fire outbreak</td></tr> <tr><td>11</td><td>Engine Room</td><td>11</td><td>Bag worm treatment</td></tr> <tr><td>12</td><td>Workshop Operation</td><td>12</td><td>Workshop operations</td></tr> </tbody> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operations. They include engineering controls (such as machine guarding / cover for rotating / moving parts, installation of Local Exhaust Ventilation in the laboratory), provision of appropriate administrative controls (adherence to Standard Operating Procedures, follow instructions on Chemical Data Sheet as attached to products, obeying safety signage displayed) and the use of PPE recommended.</p> <p>CHRA has been carried out at Kluang Palmol POM, Pamol Timur Estate and Unijaya Estate in March 2014 by Synergy Training & Consultancy (M) Sdn Bhd (JKKP HIE 127/171-2(316)). The reports are still valid until March 2019.</p> | | Areas/Activities (Mill) | | Areas /Activities (Estate) | 1 | FFB Reception | 1 | Chemical spraying | 2 | Sterilizer | 2 | Collection – buffalo | 3 | Threshing | 3 | Harvesting | 4 | Digestion and Pressing | 4 | Chemical store | 5 | Oil Room | 5 | Pruning | 6 | Product Storage and despatch | 6 | Road maintenance | 7 | Biogas Plant | 7 | Electrical works | 8 | Effluent Treatment Plant | 8 | Transporting FFB to mill | 9 | Water Treatment Plant | 9 | Tractor driving | 10 | Boiler Operation | 10 | Fire outbreak | 11 | Engine Room | 11 | Bag worm treatment | 12 | Workshop Operation | 12 | Workshop operations | <p>Complied</p> |
| | Areas/Activities (Mill) | | Areas /Activities (Estate) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | FFB Reception | 1 | Chemical spraying | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Sterilizer | 2 | Collection – buffalo | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Threshing | 3 | Harvesting | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Digestion and Pressing | 4 | Chemical store | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Oil Room | 5 | Pruning | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Product Storage and despatch | 6 | Road maintenance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Biogas Plant | 7 | Electrical works | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Effluent Treatment Plant | 8 | Transporting FFB to mill | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Water Treatment Plant | 9 | Tractor driving | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Boiler Operation | 10 | Fire outbreak | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | Engine Room | 11 | Bag worm treatment | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Workshop Operation | 12 | Workshop operations | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p> | <p>All workers at the mill and estates have been trained in safe working practices. See Criteria 4.8 for sample of training given.</p> <p>Example of coverage of such training is as follows. The SOP for chemical handling is described in <i>SOP Bab 17 issue no 2</i> dated 1/8/18. Therein the content states the below details;</p> <ul style="list-style-type: none"> a) A trained person to handle chemicals b) PPE adherence c) Handling details before and after d) Emergency situation procedures. <p>Based on the risk assessment conducted during Hazard Identification review, Kluang Palmol Palm Oil Mill and estates issued, as the last means of protection at workplace, appropriate PPE to its employees. Records of PPE issued are maintained individually for all employees. PPE issued to the workers include safety helmets, safety shoes, rubber boots. Special PPE were also provided for workers assigned to height and confined space. Acknowledgement of receipt was recorded. During site visit the staff/workers were seen donning their proper attire & PPE. The field visits covered activities of mill operation, field harvesting, fertiliser application and spraying.</p> | <p>Complied</p> |



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| <p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p> | <p>The respective Mill and Estate Manager appoint an Assistant Manager of theirs as the person in charge for safety and environment through an official letter. For example, at Pamol Timur Estate letter dated 10/11/17 for such an appointment was sighted. The PIC role covers areas of responsibilities on safety, health and welfare of the staff/workers. The Mill and Estates Managers in turn were appointed as the Chairman for the ESH committee. His duties among other was to preside the ESH meetings, discharge the General Duties of Employers and make decision arising out of issues discussed for improvement of Safety, Health, Welfare and the Environment.</p> <p>In addition, the Manager subsequently assigned duties of S&H coordinator to the Assistants/Supervisors for the down line implementation of S&H practices in the mill and estates. The management conduct regular two-way communication with their employees through the quarterly ESH meeting.</p> <p>The minutes of meeting were sighted and verified. The dates of meetings held are recorded below.</p> <table border="1" data-bbox="660 1055 1225 1317"> <thead> <tr> <th colspan="4">Pamol Kluang Palm Oil Mill</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>17.01.2018</td> <td>3</td> <td>13.07.2018</td> </tr> <tr> <td>2</td> <td>12.04.2018</td> <td>4</td> <td>12.10.2018</td> </tr> <tr> <th colspan="4">Pamol Timur Estate</th> </tr> <tr> <td>1</td> <td>26.12.17</td> <td>3</td> <td>11.6.18</td> </tr> <tr> <td>2</td> <td>8.3.18</td> <td>4</td> <td>13.9.18</td> </tr> <tr> <th colspan="4">Unijjaya Estate</th> </tr> <tr> <td>1</td> <td>29.1.18</td> <td>3</td> <td>24.7.18</td> </tr> <tr> <td>2</td> <td>25.4.18</td> <td>4</td> <td>26.10.18</td> </tr> </tbody> </table> | Pamol Kluang Palm Oil Mill | | | | 1 | 17.01.2018 | 3 | 13.07.2018 | 2 | 12.04.2018 | 4 | 12.10.2018 | Pamol Timur Estate | | | | 1 | 26.12.17 | 3 | 11.6.18 | 2 | 8.3.18 | 4 | 13.9.18 | Unijjaya Estate | | | | 1 | 29.1.18 | 3 | 24.7.18 | 2 | 25.4.18 | 4 | 26.10.18 | <p>Complied</p> |
| Pamol Kluang Palm Oil Mill | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 17.01.2018 | 3 | 13.07.2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 12.04.2018 | 4 | 12.10.2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pamol Timur Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 26.12.17 | 3 | 11.6.18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 8.3.18 | 4 | 13.9.18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unijjaya Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 29.1.18 | 3 | 24.7.18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 25.4.18 | 4 | 26.10.18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p> | <p>The CU continued to use established procedures contained in their OHS Manual (a) 3.4.2 Accident/Incident Investigation & Reporting and (b) 3.3.4.3 Emergency Prevention, Preparedness and Response.</p> <p>The procedures have been summarised in a flow chart form and displayed at notice boards for mill and estates employees information. Likewise, the respective Operating Unit ERP organization chart and important telephone contact numbers have been established and displayed too.</p> <p>ERT members receive training and practice in emergency procedures conducted by an external training provider as well as on First Aid by their EHA/MA.</p> <p>The trainees for the First Aid were among employees of office support staff, mill work station operators (day and night shift) and estate field staff/mandores. First aid boxes were noted made available at various points in the mill and estates complex including office, workshop, sprayers washing facilities, etc.</p> <p>Records of accident including investigation report, DOSH forms JKKP 6 and JKKP 8 were sighted kept. As per procedure, all cases of accidents more than 4 days were investigated. The S&H committee reviewed the HIRARC and where relevant change the severity and/or likely rating and institute corresponding control measures.</p> | <p>Complied</p> | | | | | | | | | | | | | | | | |
| <p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- Minor compliance -</p> | <p>The CU continued to ensure all workers working in their premises (both mill and estates) are covered by insurance. All local workers were covered by SOCSO as required under the Employee's Social Security Act 1969. At Palmol Palm Oil Mill SOCSO payment was via online portal. Its payment advice slip no. 60654 dated 12.11.2018 for October 2018 contribution vide MBB (M2E) FPX ID:1811121156330145 for 83 employees was sighted.</p> <p>Foreign workers were covered by insurance as per the Workmen Compensation Act 1952. Insurance Underwriter is MSIG Insurance (Malaysia) Bhd and policy details as below.</p> <table border="1" data-bbox="660 1603 1289 1989"> <thead> <tr> <th>Mill / Estate</th> <th>Policy no.</th> <th>Validity</th> <th>No. of employees sample insured</th> </tr> </thead> <tbody> <tr> <td>Pamol Kluang POM</td> <td>DL-10088534-FWC</td> <td>01.10.18 to 30.09.19</td> <td>47 workers</td> </tr> <tr> <td>Pamol Timur Estate</td> <td>DL-10088520-FWC</td> <td>01.10.18 to 30.09.19</td> <td>176 workers</td> </tr> <tr> <td>Unijaya Estate</td> <td>DL-10088934-FWC</td> <td>01.10.18 to 30.09.19</td> <td>101 workers</td> </tr> </tbody> </table> | Mill / Estate | Policy no. | Validity | No. of employees sample insured | Pamol Kluang POM | DL-10088534-FWC | 01.10.18 to 30.09.19 | 47 workers | Pamol Timur Estate | DL-10088520-FWC | 01.10.18 to 30.09.19 | 176 workers | Unijaya Estate | DL-10088934-FWC | 01.10.18 to 30.09.19 | 101 workers | <p>Complied</p> |
| Mill / Estate | Policy no. | Validity | No. of employees sample insured | | | | | | | | | | | | | | | |
| Pamol Kluang POM | DL-10088534-FWC | 01.10.18 to 30.09.19 | 47 workers | | | | | | | | | | | | | | | |
| Pamol Timur Estate | DL-10088520-FWC | 01.10.18 to 30.09.19 | 176 workers | | | | | | | | | | | | | | | |
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| 4.7.7 | Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance - | Records of accidents are maintained and summarized in JKPP 8. The accidents incidence in 2017 recorded in the estates as shown below: | | | | Complied |
| | | Year | POM | Palm Timur Estate | Unijaya Estate | |
| | | 2017 (Jan – Dec) | 29 cases (27 days LTI) | 32 cases (192 days LTI) | 26 cases (141 days LTI) | |
| | | 2018 (Jan – Oct) | 21 cases (19 days LTI) | 13 cases (25 days LTI) | 18 cases (21 days LTI) | |
| Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained. | | | | | | |
| 4.8.1 | A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance - | <p>All employees and contractors/vendors were provided training related to their job skills, RSPO requirements, Occupational Health & Safety and Environmental matters. They include subjects on estates operating procedures as well as procedural matters caring for Occupational Health & Safety and Environmental, from felling of oil palm trees, nursery, replanting, harvesting and upkeep of fields to evacuation of FFB to mill. Likewise, at the mill it covers from FFB receipt, grading, processing to Crude Palm Oil, storage and dispatch of CPO, nut kernel and the management of by-products, wastes and waste streams.</p> <p>The training program specified the target group of employees to be trained for the identified subjects. In addition to the Good Mill / Agricultural Practice training, that is, Process stations / field SOP related to trade/job skills, the following topics, among others, were included in the 2018/19 annual training program;</p> <ul style="list-style-type: none"> a) OSH Act & regulations 1994. b) Environmental Quality Act 1974 c) Induction Program for new workers. d) OSH Committee and function. e) First Aid Training f) Scheduled waste training g) RSPO/MSPO/ISCC Principles h) HCV & Biodiversity training. i) Mechanical/electrical workshop j) Environmental/safety & health policy/ environmental responsibility, k) Emergency Response drill l) Social program | | | | Complied |

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| <p>4.8.2</p> | <p>Records of training for each employee shall be maintained. - Minor compliance -</p> | <p>Records of training were sighted during this audit, sample sighted are as shown below:</p> <p>a) Pamol Kluang Oil Mill</p> <table border="1"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>12/7/18</td><td>Boiler Operation / WTP</td><td>6</td></tr> <tr><td>2</td><td>10/9/18</td><td>Press, Oil Room & Kernel plant</td><td>10</td></tr> <tr><td>3</td><td>20/8/18</td><td>Sterilizer station</td><td>4</td></tr> <tr><td>4</td><td>14/6/18</td><td>Sexual harassment /rights/gender</td><td>Entire</td></tr> <tr><td>5</td><td>8/6/16</td><td>Tanker & Kernel inspection</td><td>4</td></tr> <tr><td>6</td><td>14/9/18</td><td>Kernel and Nut station</td><td>6</td></tr> <tr><td>7</td><td>21/5/18</td><td>Work Instruction and Procedure training - Lab</td><td>4</td></tr> <tr><td>8</td><td>20/9/18</td><td>Scheduled waste</td><td>Entire</td></tr> <tr><td>9</td><td>25/4/18</td><td>Physical injury</td><td>Entire</td></tr> <tr><td>10</td><td>22/11/18</td><td>Chemical spillage,</td><td>8</td></tr> <tr><td>11</td><td>9/11/18</td><td>Shovel, tractor, driving</td><td>4</td></tr> <tr><td>12</td><td>25/4/18</td><td>Fire outbreak</td><td>Entire</td></tr> <tr><td>13</td><td>20/9/18</td><td>Scheduled waste spillage</td><td>Entire</td></tr> </tbody> </table> <p>b) Palmol Timur Estate</p> <table border="1"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>30/8/18</td><td>IPM Guidelines</td><td>9</td></tr> <tr><td>2</td><td>5/9/18</td><td>IPM implementation – Barn Owl</td><td>4</td></tr> <tr><td>3</td><td>1/10/18</td><td>Road maintenance</td><td>10</td></tr> <tr><td>4</td><td>4/9/18</td><td>Water quality index</td><td>8</td></tr> <tr><td>5</td><td>29/9/18</td><td>FFB Loading Tractor</td><td>5</td></tr> <tr><td>6</td><td>29/9/18</td><td>Induction program for new FW</td><td>5</td></tr> <tr><td>7</td><td>19/9/18</td><td>Manuring, PPE, SDS, First Aid</td><td>13</td></tr> <tr><td>8</td><td>19/9/18</td><td>Spraying safety procedures</td><td>12</td></tr> <tr><td>9</td><td>13/9/18</td><td>Buffalo handling</td><td>20</td></tr> <tr><td>10</td><td>8/7/18</td><td>Motorcycle riding</td><td>20</td></tr> <tr><td>11</td><td>13/9/18</td><td>Harvesting SOP</td><td>20</td></tr> <tr><td>12</td><td>14/9/18</td><td>Sexual harassment /rights/gender</td><td>Entire</td></tr> <tr><td>13</td><td>20/8/18</td><td>Grievance /complaint procedures</td><td>entire</td></tr> <tr><td>14</td><td>29/8/18</td><td>Workshop operations</td><td>3</td></tr> <tr><td>15</td><td>24/7/18</td><td>Chemical spraying</td><td>24</td></tr> </tbody> </table> <p>c) Unijaya Estate</p> <table border="1"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>14/11/18</td><td>SOP -Spraying SDS, PPE, first Aid</td><td>7</td></tr> </tbody> </table> | No | Date | Subject | Attendees | 1 | 12/7/18 | Boiler Operation / WTP | 6 | 2 | 10/9/18 | Press, Oil Room & Kernel plant | 10 | 3 | 20/8/18 | Sterilizer station | 4 | 4 | 14/6/18 | Sexual harassment /rights/gender | Entire | 5 | 8/6/16 | Tanker & Kernel inspection | 4 | 6 | 14/9/18 | Kernel and Nut station | 6 | 7 | 21/5/18 | Work Instruction and Procedure training - Lab | 4 | 8 | 20/9/18 | Scheduled waste | Entire | 9 | 25/4/18 | Physical injury | Entire | 10 | 22/11/18 | Chemical spillage, | 8 | 11 | 9/11/18 | Shovel, tractor, driving | 4 | 12 | 25/4/18 | Fire outbreak | Entire | 13 | 20/9/18 | Scheduled waste spillage | Entire | No | Date | Subject | Attendees | 1 | 30/8/18 | IPM Guidelines | 9 | 2 | 5/9/18 | IPM implementation – Barn Owl | 4 | 3 | 1/10/18 | Road maintenance | 10 | 4 | 4/9/18 | Water quality index | 8 | 5 | 29/9/18 | FFB Loading Tractor | 5 | 6 | 29/9/18 | Induction program for new FW | 5 | 7 | 19/9/18 | Manuring, PPE, SDS, First Aid | 13 | 8 | 19/9/18 | Spraying safety procedures | 12 | 9 | 13/9/18 | Buffalo handling | 20 | 10 | 8/7/18 | Motorcycle riding | 20 | 11 | 13/9/18 | Harvesting SOP | 20 | 12 | 14/9/18 | Sexual harassment /rights/gender | Entire | 13 | 20/8/18 | Grievance /complaint procedures | entire | 14 | 29/8/18 | Workshop operations | 3 | 15 | 24/7/18 | Chemical spraying | 24 | No | Date | Subject | Attendees | 1 | 14/11/18 | SOP -Spraying SDS, PPE, first Aid | 7 | <p>Complied</p> |
|--------------|---|--|-----------|------|---------|-----------|---|---------|------------------------|---|---|---------|--------------------------------|----|---|---------|--------------------|---|---|---------|----------------------------------|--------|---|--------|----------------------------|---|---|---------|------------------------|---|---|---------|---|---|---|---------|-----------------|--------|---|---------|-----------------|--------|----|----------|--------------------|---|----|---------|--------------------------|---|----|---------|---------------|--------|----|---------|--------------------------|--------|----|------|---------|-----------|---|---------|----------------|---|---|--------|-------------------------------|---|---|---------|------------------|----|---|--------|---------------------|---|---|---------|---------------------|---|---|---------|------------------------------|---|---|---------|-------------------------------|----|---|---------|----------------------------|----|---|---------|------------------|----|----|--------|-------------------|----|----|---------|----------------|----|----|---------|----------------------------------|--------|----|---------|---------------------------------|--------|----|---------|---------------------|---|----|---------|-------------------|----|----|------|---------|-----------|---|----------|-----------------------------------|---|-----------------|
| No | Date | Subject | Attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 12/7/18 | Boiler Operation / WTP | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 10/9/18 | Press, Oil Room & Kernel plant | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 20/8/18 | Sterilizer station | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 14/6/18 | Sexual harassment /rights/gender | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 8/6/16 | Tanker & Kernel inspection | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | 14/9/18 | Kernel and Nut station | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 21/5/18 | Work Instruction and Procedure training - Lab | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 20/9/18 | Scheduled waste | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | 25/4/18 | Physical injury | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | 22/11/18 | Chemical spillage, | 8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | 9/11/18 | Shovel, tractor, driving | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | 25/4/18 | Fire outbreak | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 13 | 20/9/18 | Scheduled waste spillage | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No | Date | Subject | Attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 30/8/18 | IPM Guidelines | 9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 5/9/18 | IPM implementation – Barn Owl | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 1/10/18 | Road maintenance | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 4/9/18 | Water quality index | 8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 29/9/18 | FFB Loading Tractor | 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | 29/9/18 | Induction program for new FW | 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 19/9/18 | Manuring, PPE, SDS, First Aid | 13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 19/9/18 | Spraying safety procedures | 12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | 13/9/18 | Buffalo handling | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | 8/7/18 | Motorcycle riding | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | 13/9/18 | Harvesting SOP | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | 14/9/18 | Sexual harassment /rights/gender | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 13 | 20/8/18 | Grievance /complaint procedures | entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 14 | 29/8/18 | Workshop operations | 3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 | 24/7/18 | Chemical spraying | 24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No | Date | Subject | Attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 14/11/18 | SOP -Spraying SDS, PPE, first Aid | 7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Criterion / Indicator | | Assessment Findings | | | | Compliance |
|-----------------------|--|---------------------|----------|-----------------------------------|--------|------------|
| | | 2 | 17/11/18 | SOP – Tractor driving | 7 | |
| | | 3 | 16/11/18 | Workshop operation - Safety | 2 | |
| | | 4 | 16/11/18 | Harvesting SOP | 29 | |
| | | 5 | 28/8/18 | First Aid By MA | 10 | |
| | | 6 | 24/10/18 | ERP – Fire, first aid, ERT | Entire | |
| | | 7 | 29/8/8 | SW Management | 40 | |
| | | 8 | 23/8/18 | Highly toxic pesticides - SOP | 12 | |
| | | 9 | 18/8/18 | Rat baiting | 8 | |
| | | 10 | 23/7/18 | Office operations SOP | 11 | |
| | | 11 | 3/58/1 | Manuring SOP | 7 | |
| | | 12 | 25/4/18 | Safety Campaign | Entire | |
| | | 13 | 17/4/18 | PPE adherence | 9 | |
| | | 14 | 26/3/18 | Chemical mixing | 1 | |
| | | 15 | 24/3/18 | Open Burning Policy | 6 | |
| | | 16 | 23/11/18 | Induction program new FW | 4 | |
| | | 17 | 31/10/18 | VLP/grievance /pay slips briefing | Entire | |
| | | 18 | 22/11/18 | Company Policy briefing | Entire | |
| | | 19 | 9/2/18 | Buffer zone - manurer/sprayer | 20 | |
| | | 20 | 30/8/18 | Oil trap maintenance | 10 | |
| | | 21 | 17/8/18 | HCV protection | Entire | |
| | | 22 | 23/11/18 | Wild life training | Entire | |

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

Criterion 5.1:

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

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| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|-----------------|
| <p>5.1.1</p> <p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p> | <p>IOI Group has established Environmental Policy and documented in Sustainable Palm Oil Policy signed by the group CEO and group Head of Sustainability in Feb 2017.</p> <p><u>Pamol Kluang POM</u> The Sustainability team has established the Environmental Impacts Assessment and documented in Environmental Impacts Assessment, Management Action Plans and Continuous Improvement Plans – Pamol Kluang POM Nov 2015 – Oct 2020, Appendix I. The assessment was reviewed annually. The assessment covers on all workstation and activity in the mill. The latest review was conducted on 14 November 2018.</p> <p><u>PTE</u> The Sustainability team has established the Environmental Impacts Assessment and documented in Environmental Impacts Assessment, Management Action Plans and Continuous Improvement Plans – Pamol Timur Estate Nov 2015 – Oct 2020, Appendix I. The assessment was reviewed annually. The assessment has covers on all workstation and activity in the estate operations. The latest review was conducted on 14 November 2018.</p> <p><u>UJE</u> The Sustainability team has established the Environmental Impacts Assessment and documented in Environmental Impacts Assessment, Management Action Plans and Continuous Improvement Plans – Unijaya Estate Nov 2015 – Oct 2020, Appendix I. The assessment was reviewed annually. The assessment has covers on all workstation and activity in the estate operations. The latest review was conducted on 20 November 2018.</p> | <p>Complied</p> |

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| Criterion / Indicator | Assessment Findings | Compliance |
|--|---|-----------------|
| <p>5.1.2</p> <p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p> | <p>Activities with significant impacts were determined by the score in Environmental Aspect and Impact Identification and Risk Assessment.</p> <p><u>Pamol Kluang POM</u></p> <p>Based on the activities with significant impacts, the mill has established Environmental Pollution and Greenhouse Gas Management Plan. The plan stated the activity, type of impact, mitigation plan, documents to be review, management comments and person responsible.</p> <p>Sighted the implementation of the plan as follows:</p> <p>i. Latest boundary noise monitoring was conducted by Env Consultancy & Monitoring Services Sdn. Bhd on 12/7/2018. Refer report no. ENV/B.NOISE/PAMOL/028.</p> <p><u>PTE and UJE</u></p> <p>Estates visited has established environmental management plan base on Environmental Aspect and Impact Identification and Risk Assessment and documented in Environmental Pollution and Greenhouse Gas Management Plan. The plan stated the activity, type of impact, mitigation plan, documents to be review, management comments and person responsible.</p> <p>Sighted the implementation of the plan as follows:</p> <p><u>PTE</u></p> <p>i. Chemical Spillage and Chemical spraying SOP training dated 25/10/2018 ii. Chemical mixing SOP training dated 27/10/2018 iii. Scheduled waste store management dated 27/10/2018</p> <p><u>UJE</u></p> <p>i. Safety Operating Procedure on Chemical Mixing and empty Container Management dated 26/3/2018 ii. Safety Operating Procedure for Chemical Store Management dated 26/3/ 2018</p> | <p>Complied</p> |

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| <p>5.1.3</p> <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p> | <p><u>Pamol Kluang POM</u></p> <p>Based on the activities with significant impacts, the mill has established Environmental Pollution and Greenhouse Gas Management Plan. The plan stated the activity, type of impact, mitigation plan, and documents to be review, management comments and person responsible. The plan was reviewed annually. The latest review was conducted on 14 November 2018.</p> <p><u>PTE</u></p> <p>Based on the activities with significant impacts, the mill has established Environmental Pollution and Greenhouse Gas Management Plan. The plan stated the activity, type of impact, mitigation plan, and documents to be review, management comments and person responsible. The plan was reviewed annually.</p> <p><u>UJE</u></p> <p>Estate has established environmental management plan base on Environmental Aspect and Impact Identification and Risk Assessment and documented in Environmental Pollution and Greenhouse Gas Management Plan. The plan stated the activity, type of impact, mitigation plan, documents to be review, management comments and person responsible. The plan was reviewed annually. The latest review was conducted on 20/11/2018</p> | <p>Complied</p> |
| <p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p> | | |
| <p>5.2.1</p> <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p> | <p>The information required by this criterion has been met via an assessment on RTE carried out on 21/11/15 and reviewed on 4/3/18. Therein it addressed the following:</p> <ul style="list-style-type: none"> a) Objectives <ul style="list-style-type: none"> - To identify RTE species surrounding the estate. - To identify the status of species identified - To develop action plan to maintain/enhance the species - Educate workforce - To ensure no individual capture b) Protection of Wildlife Act 1972/Wildlife Conservation Act 2010. c) List of important bird areas IBAs for Malaysia d) Protection Animals and others under Wildlife Protection Act 1972 (fauna) e) Protected mammals/aquatic/protected animals/protected birds f) Statement of commitment g) Action plan for monitoring RTE within and surrounding estate compound h) Mechanism for monitoring and reviewing outcomes of monitoring i) Contact no. of local authorities. | <p>Complied</p> |

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| 5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance - | This has been noted in 5.2.1 (g) above. Signboards and training RTE and HCV are also displayed at strategic points of the estates such as at the main gate to estate, areas where HCV is present and also information provided to the employees on such a requirement. Training in relation to RTE is shown in 4.8 | Complied |
| 5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance - | The continuous improvement plan had identified the plan to continually educate the workers regarding RTE. Sighted at Unijaya Estate attendance record of Wildlife training was conducted on 23.1.2018 for 20 workers. Workers interviewed confirmed that they are aware of no hunting is permitted in and within the estate. | Complied |
| 5.2.4 Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance - | <p>Monthly monitoring records on the status of HCV and RTE were sighted and verified.</p> <p>It was found that the status of HCV monitoring at Palmol Timur Estate was not reflective of actual sightings in the field vs. the sighted record. The recorded fronds (Monthly Monitoring Checklist – Buffer Zone for October and November 2018) contradicts the age (brown colour fronds) of the fronds sighted.</p> <p>This clearly demonstrates non-conformance against the requirement of item no. 7, Buffer Zone Signage, erected 100m away.</p> <p>Further examination of the said two months’ record showed “No Frond Stacking in the Buffer Zone” recorded in column “Field No.”: It was confirmed as YES by the signature indicated in the space provided “PIC Monitored and Recorded” and “PIC Verifier and Signature” when they were not.</p> | Minor Nonconformance |
| 5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance - | There is no HCV set-asides for local communities identified in all the estates. | Complied |
| Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner. | | |

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| <p>5.3.1</p> <p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p> | <p>Pamol Kluang palm oil Mill and supply base has identified all waste products generated from mill and estates operations. The identification also covers the workstation where the waste been generated. It was documented in Environmental Impact Assessment and Action plan under section List of Waste and Pollutants. Waste identified as follows:</p> <ul style="list-style-type: none"> i. Spent hydraulic and lubricant oil ii. Spent oil contaminated rags, oil filter and oil containment iii. Oil and Greases iv. Pruned fronds, chipped trunks and plant debris v. domestic waste vi. chemical waste and containers vii. used PPE viii. Spent baterries ix. Electronic and Electrical waste x. Scrap Metal and bald tyres xi. Clinical waste <p>All operating units visited has established Waste Management and Reduction Plan base on the waste and source identified. The plan was monitored and reviewed on annually basis. Sighted the waste management plan for waste generated as follows:</p> <ul style="list-style-type: none"> i. Palm Oil Mill – EFB, POME ii. SW Store – Waste engine oil SW 305,SW 306, Used lead acid batteries SW 102 iii. Workshop – PPE, Empty container, old tires iv. Clinic – Clinical waste v. Buffalo holding area – urine, dung | <p>Complied</p> |

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| <p>5.3.2</p> <p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p> | <p>The disposal of used chemicals and containers were done accordingly as per regulation. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have designated Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p><u>PTE</u> Empty chemical container and used chemical was disposed as scheduled waste through licensed contractors. The inventory records was submitted to DOE through E-SWISS. Sighted the E-SWISS record for the month of July, Aug and Sept 2018. Latest disposal was conducted as follows: i. SW 305; C/N no: 2018102411TWZ2K4, 0.1310 MT dated 24 /9/2018. ii. SW 312; C/N no: 201810241154GUKQ, 0.0045 MT dated 24 /9/2018. iii. SW 409; C/N no: 2018102411C4JPTO, 0.55 MT dated 24 /9/2018.</p> <p><u>UJE</u> Empty chemical container and used chemical was disposed as scheduled waste through licensed contractors. The inventory records was submitted to DOE through E-SWISS. Sighted the E-SWISS record for the month of July, Aug and Sept 2018. Latest disposal was conducted as follows: i. SW 305; C/N no: 2018102411TWZ2K4, 0.1310 MT dated 24 /9/2018. ii. SW 312; C/N no: 201810241154GUKQ, 0.0045 MT dated 24 /9/2018. iii. SW 409; C/N no: 2018102411C4JPTO, 0.55 MT dated 24 /9/2018</p> <p><u>UJE</u> Inventory for all SW generated was maintained in Inventory of Scheduled Waste form. Sighted the inventory of SW for the month August, September and October 2018 documented in SW In/Out form and reported to DOE through E-SWISS. The SW was disposed through licensed contractor, Kualiti Alam. Sighted the latest disposal was conducted as follows: i. SW 410; C/N no: 0122162, dated 19/9/2018. ii. SW 305; C/N no: 0122160, dated 19/9/2018. iii. SW 409; C/N no: 0122161, dated 19/9/2018</p> | <p>Complied</p> |

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| <p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p> | <p><u>PK POM</u></p> <p>The mill has established waste management plan. The plan was was conducted base on type of waste and waste source (work station). Sighted the implementation of the waste management plan as follows:</p> <p><u>PTE and UJE</u></p> <p>The estate visited has established waste management plan. The plan was was conducted base on type of waste and waste source (work station). Sighted the implementation of the waste management plan as follows:</p> <p><u>PTE</u></p> <p>Empty chemical container and used chemical was disposed as scheduled waste through licensed contractors. Latest disposal was conducted as follows:</p> <ul style="list-style-type: none"> i. SW 305; C/N no: 2018102411TWZ2K4, 0.1310 MT dated 24 /9/2018. ii. SW 312; C/N no: 201810241154GUKQ, 0.0045 MT dated 24 /9/2018. iii. SW 409; C/N no: 2018102411C4JPTO, 0.55 MT dated 24 /9/2018 <p><u>UJE</u></p> <p>Inventory for all SW generated was maintained in Inventory of Scheduled Waste form. Sighted the inventory of SW for the month August, September and October 2018 documented in SW In/Out form and reported to DOE through E-SWISS. The SW was disposed through licensed contractor, Kualiti Alam</p> | <p>Complied</p> |

Criterion 5.4:
 Efficiency of fossil fuel use and the use of renewable energy is optimised.

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| 5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance - | <p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. Itis monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO.</p> <p>Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel.</p> <p>Monthly records of energy consumption of non-renewable and renewable fuel per metric ton of palm product at the Mill were available. Sighted the sampled records as follows:</p> <table border="1" data-bbox="657 898 1289 1061"> <thead> <tr> <th>Month</th> <th>Diesel consumption/CPO</th> <th>Fibre and Shell/CPO</th> </tr> </thead> <tbody> <tr> <td>Aug 18</td> <td>0.84</td> <td>0.72</td> </tr> <tr> <td>Sep 18</td> <td>0.77</td> <td>0.73</td> </tr> <tr> <td>Oct 18</td> <td>0.87</td> <td>0.73</td> </tr> </tbody> </table> <p>Average of renewable and non-renewable for FY 2017 as follows</p> <p>Diesel consumption/CPO : 1.14L/ CPO produced</p> <p>Fibre and Shell consumption/CPO : 0.74/CPO produced</p> | Month | Diesel consumption/CPO | Fibre and Shell/CPO | Aug 18 | 0.84 | 0.72 | Sep 18 | 0.77 | 0.73 | Oct 18 | 0.87 | 0.73 | Complied |
| Month | Diesel consumption/CPO | Fibre and Shell/CPO | | | | | | | | | | | | |
| Aug 18 | 0.84 | 0.72 | | | | | | | | | | | | |
| Sep 18 | 0.77 | 0.73 | | | | | | | | | | | | |
| Oct 18 | 0.87 | 0.73 | | | | | | | | | | | | |
| Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice. | | | | | | | | | | | | | | |
| 5.5.1 There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance - | IOI group has established Zero Burning Policy as per 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, EQA 1974 specifically on section 29A (prohibition on Open Burning) and 29AA (Exclusion from 'Open Burning') signed by the Plantation Director on May 2018. The policy was communicated to all the employee through training, briefing and signage at several notice board in the estate. | Complied | | | | | | | | | | | | |
| 5.5.2 Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance - | IOI group has established Group Standard Operating Procedure (StOP) for Land Clearing, index 4.1 and Group Standard Operating Procedure (StOP) for Land Preparation for New Planting and Replanting, index 4.2 prepared on September 2007. All felled palm will be shredded or chip and piled between planting rows. | Complied | | | | | | | | | | | | |
| Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored. | | | | | | | | | | | | | | |

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| <p>5.6.1</p> | <p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p> | <p>Various monitoring has been conducted including the effluent analysis, stack monitoring and river water monitoring.</p> <p>At Mill, monitoring of mill gas emissions is being done online using the Continuous Emissions Monitoring System (CEMS) and supported by the Ringelman Smoke Chart Sighted the stack monitoring records for FY 2017 and 2018 as follows:</p> <p>Boiler 1</p> <p>i. 1st Half 2017: Date conducted on 11/5/2017, Ref no: ENV/PAMOL/ISO/114/2017. Results conform to permissible limit of 0.150 gm/Nm3 stipulated under the Environmental Quality (Clean Air) Regulations, 1978.</p> <p>ii. 2nd Half 2018: Not conducted due to alternator breakdown. The management has informed DOE through letter dated 20/11/2017. Refer letter no DOE/MS/2517.</p> <p>iii. 1st half 2018: Date conducted on 13/8/2018, Ref no: AEMR (J)/18-09/08. Results conform to permissible limit of 0.150 gm/Nm3 stipulated under the Environmental Quality (Clean Air) Regulations, 1978.</p> <p>Boiler 1</p> <p>i. 1st Half 2017: Date conducted on 30/6/2017, Ref no: ENV/PAMOL/ISO/191/2017. Results conform to permissible limit of 0.150 gm/Nm3 stipulated under the Environmental Quality (Clean Air) Regulations, 1978.</p> <p>ii. 2nd Half 2018: Date conducted on 20/12/2017, Ref no: ENV/PAMOL/KLUANG/STACK/1217/016. Results conform to permissible limit of 0.150 gm/Nm3 stipulated under the Environmental Quality (Clean Air) Regulations, 1978.</p> <p>iii. 1st half 2018: Date conducted on 12/6/2018, Ref no: AEMR (J)/18-09/08. Results conform to permissible limit of 0.150 gm/Nm3 stipulated under the Environmental Quality (Clean Air) Regulations, 1978.</p> <p>The estate and mill also conducting river water monitoring records. Sampled result sighted as follows:</p> <p>Pamol Kluang POM</p> <p>River water monitoring was conducted on monthly basis. Analysis was conducted by Env Consultancy and Monitoring Services. Sighted the report for the month of</p> <p>i. Jul 18, ref no. W/1807/13593 – conform to NWQS class III</p> <p>ii. Aug 18, ref no. ENV/RIVERWATER/PAMOL/082 – conform to NWQS class III</p> <p>iii. Sep 18, ref no. ENV/RIVER/PAMOL/087 – conform to NWQS class III</p> <p><u>PTE</u></p> <p>The latest sampling was carried out on 19/7/2018. Refer report no. UJE/25/08/2018. The result shows non-conformity to NWQS class III as the NH3N result is higher. The estate has identified the manuring application as the</p> | <p>Complied</p> |
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| | <p>root cause of the issue and has given refresher training to all the fertiliser applicator on manuring at the buffer zone on 14/11/2018.</p> <p><u>UJE</u> The latest sampling was carried out on 12/7/2018. Refer report no. PTE/01/08/2018. The result shows non-conformity to NWQS class III as the NH3N result is higher compare to standard. However the results was not due to the activity in the estate as the results show from upstream to downstream shows reducing result of NH3N from class IV standard to class III standard.</p> | |
| <p>5.6.2</p> <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance</p> | <p>Significant pollutants and greenhouse gas (GHG) emissions were identified includes methane from effluent, smoke and fertilizer usage have been adequately documented. The management plan has been established and documented in the Environmental Impact Assessment and Action plan under section Environmental Pollution and Greenhouse Gases Management Plan.</p> <p>The mill management has budgeted new CAPEX in 2018 to improve pollution reduction. Sighted the progress of the projects as follows:</p> <ul style="list-style-type: none"> i. Biogas Plant – Tender in Progress ii. Polishing Plant – Tender in Progress iii. Boiler Emission Control Systems – Tender Completed | <p>Complied</p> |
| <p>5.6.3</p> <p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -</p> | <p>Tools and systems used to monitor significant pollutants includes the DOE CEMS monitoring system for air emissions, water quality at discharge points as per DOE regulations.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied.</p> <p>These GHG calculations were done as per certification unit basics including 5 estate and mill. Summary emissions:</p> <ul style="list-style-type: none"> i. Emission/ mt CPO= 1.21 tCO2 e/mt CPO ii. Emission/ mt PK= 1.21 tCO2 e/mt PK | <p>Complied</p> |
| <p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p> | | |
| <p>Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p> | | |

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| 6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance - | Social Impact Assessment was 1 st carried out on 12/11/2015 in Pamol Kluang POM, 22/11/2015 in Pamol Timur Estate and 15/11/2015 in Unijaya Estate and last reviewed on 20/11/2018 in Pamol Kluang POM, 22/11/2018 in Pamol Timur Estate and 15/11/2018 in Unijaya Estate by the Sustainability Department. The method of the assessment was done based on consultation with the stakeholders that related directly or indirectly to the mill daily operations. The assessment has involved the participation of stakeholders such as government authorities, local communities, internal workers, contractors, smallholders and NGOs. The issues of concern raised by the stakeholders were recorded in the Social Impact Assessment & Time Bound Plan Action Plan. | Complied |
| 6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance - | The assessment has involved the participation of affected stakeholders such as government authorities, local communities, internal workers, contractors, smallholders and NGOs. Attendance list of the stakeholders involved was sighted and issues of concern were recorded in the Social Impact Assessment & Time Bound Plan Action Plan. | Complied |
| 6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance - | The mill and estates developed 2018 Social Impact Assessment & Time Bound Action Plan where the positive impacts and negative impacts raised by the stakeholders have been included in the action plan. The action plan has included time bound and person to be responsibility for the implementation. For eg: a. Negative Impact: Bad smell from mill sometimes reported by school nearby. Action Plan: To install Bioplant and Polishing Plant by including into budget 2018/2019 to improve the effluent treatment system. Evidence: The mill has request for proposal to install the biogas plant and polishing plant. The mill has included the cost into CAPEX 2018/2019 and waiting to be installed by next year. | Complied |
| 6.1.4 The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance - | The last reviewed of the Social Impact Assessment & Time Bound Action Plan was conducted on 20/11/2018 in Pamol Kluang POM, 22/11/2018 in Pamol Timur Estate and 15/11/2018 in Unijaya Estate. | Complied |
| 6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance - | There was no scheme smallholder involves in the certification unit. | Not applicable |
| Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties. | | |

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| 6.2.1 | Consultation and communication procedures shall be documented. - Major compliance - | IOI Corporation Berhad has developed Stakeholder Request Procedure for Corporate Level and Pamol Kluang POM Level. The flowchart has outlined the procedure for the stakeholders to request for any procedures. Stakeholders can access to www.ioigroup.com , call IOI Group General Line/ Pamol Kluang POM office or write formal letter to Head Office of IOI. The stakeholders need to be informed the outcome within 5 working days. | Complied |
| 6.2.2 | A management official responsible for these issues shall be nominated. - Minor compliance - | Assistant Manager of the mill has been appointed as Social Liaison Officer to in charge all the social issues in the mill. The appointment letter dated 10/11/2017 was sighted which issued by the Mill Manager. Assistant Manager in Pamol Timur Estate has been appointed as Social Liaison Officer to handle the social issues in the estate and appointment letter dated 15/1/2018 was sighted. Manager of Unijaya Estate has appointed Cadet Assistant Manager to be the Social Liaison Officer and appointment letter dated 2/8/2018 was sighted. | Complied |
| 6.2.3 | A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance - | Stakeholder list has been developed for Year 2018 where stakeholder such as government bodies, local communities, NGOs, contractors and suppliers have included into the list. The list has included the contact person and the contact number of the person in charge. External stakeholder meeting was conducted on 29/10/2018 for the whole Pamol Region. Stakeholders such as contractors, government authorities, NGOs, neighbouring plantation and internal workers have attended the meeting. Meeting minutes was sighted where briefing of RSPO, MSPO, ISCC, company policies and procedures has been given to the stakeholders. Issues raised during the meeting have been incorporated into the 2018 Social Impact Assessment & Time Bound Action Plan. Internal Stakeholder meeting was conducted on 12/11/2018 in Pamol Timur Estate and 27/10/2018 in Unijaya Estate that involved stakeholders such as workers, schools' representatives, contractors and worships' representatives. Unijaya Estate has organized meeting with smallholders on 21/11/2018 to explain the company policies and procedures for RSPO. Issues raised during the meeting was incorporated into the 2018 Social Impact Assessment & Time Bound Action Plan and actions have been taken for certain issues as verified through evidence of action taken. | Complied |
| Criterion 6.3: | | | |
| There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties. | | | |
| 6.3.1 | The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance - | The company has developed Grievances Procedure to describe the process of grievances raised by internal stakeholders, external stakeholders and public. The grievances will be received and recorded by the Social Liaison Officer. The complainant will need to acknowledge once the issue has been resolved. | Complied |

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| <p>6.3.2</p> <p>Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –</p> | <p>Pamol Kluang POM, Pamol Timur Estate and Unijaya Estate has implemented Complaint/ Grievances Book to record all the grievances reported in the mill and estates. The mill also established Breakdown Report and Pamol Timur Estate has implemented Housing Defect Complaint Form to record the housing defects problem. Besides, Sustainability in Head Office has implemented IOI Internal Grievances Log/ Grievance Register (Regional Level: Peninsular Malaysia) to record the grievances centralized and monitor by Head Office. Sampled of the complaints as below:</p> <p>a. Details of Complaint: Rotten durian tree behind the boiler which might risk the safety of the workers. Action taken: The mill has appointed the contractor to fell the tree on 26/3/2018. Evidence: Seen the work done logbook of the contractor that the tree has been removed on 15/5/2018 with payment sighted. The complainant has acknowledged on the complaint logbook after the issue has been rectified.</p> <p>b. Details of Complaint: Contractor has requested the management to construct hump in Jalan Pakloh to minimize the speeding issue in the estate. Action taken: The mill has discussed with Ladang Pakloh and agreed to construct. Evidence: Seen the correspondence between the management and photo evidence was sighted where the humps were constructed.</p> | <p>Complied</p> |
| <p>Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p> | | |
| <p>6.4.1</p> <p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -</p> | <p>IOI Corporation Berhad has developed IOI Peninsular Malaysia Negotiation Procedure to identify the legal, customary or user rights of land. The flowchart has detailed all the process of the negotiation process. Besides, Grievance Procedure for Land Owner Issue was established. The procedure is applicable for the grievances from landowners to IOI and vice versa. IOI Peninsular Malaysia Land Use Compensation Procedures Flow Chart was developed to describe the complaint cases and compensation process if required.</p> | <p>Complied</p> |

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|--|---|--|
| 6.4.2 | A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance - | SOP as per indication 6.4.1. Complied |
| 6.4.3 | The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance - | There was no case of compensations occurred as there was no land dispute reported by the local communities and smallholders verified through interviewed with the stakeholders. Complied |
| Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages. | | |
| 6.5.1 | Documentation of pay and conditions shall be available. - Major compliance - | Mill and estates have employed local and foreign workers. All the mill and estates workers are under direct employment. The payslip has included basic pay, allowances, working days, deduction of salary and overtime. Payslip for December 2017, January 2018 and May 2018 was sampled based on the crop summary as below: <ul style="list-style-type: none"> a. Employee No.: PMM0196 (PKPOM) b. Employee No.: PMM0065 (PKPOM) c. Employee No.: PMM0184 (PKPOM) d. Employee No.: PMM0135 (PKPOM) e. Employee No.: PMM0077 (PKPOM) f. Employee No.: PTE0085 (PTE) g. Employee No.: PTE5005 (PTE) h. Employee No.: PTE5138 (PTE) i. Employee No.: PTE3112 (PTE) j. Passport No.: AT 200225 (PTE Contract Worker) k. Passport No.: AT 389052 (PTE Contract Worker) l. Employee No.: UJE0009 (UE) m. Employee No.: UJE0586 (UE) n. Employee No.: UJE0787 (UE) o. Employee No.: UJE0822 (UE) All the sampled workers have achieved the Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/day. |

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|--|--|-----------------|
| <p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p> | <p>Employment contract/ offer letters are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts/ offer letters as below:</p> <ul style="list-style-type: none"> a. Employee No.: PMM0140 (PKPOM) b. Employee No.: PMM2406 (PKPOM) c. Employee No.: PMM0176 (PKPOM) d. Employee No.: PMM0213 (PKPOM) e. Employee No.: PMM0207 (PKPOM) f. Employee No.: PTE0085 (PTE) g. Employee No.: PTE0276 (PTE) h. Employee No.: PTE5138 (PTE) i. Employee No.: PTE3112 (PTE) j. Passport No.: AT 200225 (PTE Contract Worker) k. Passport No.: AU 3576663 (PTE Contract Worker) l. Employee No.: UJE0942 (UE) m. Employee No.: UJE0970 (UE) n. Employee No.: UJE0956 (UE) o. Employee No.: UJE0969 (UE) <p>Workers who workers more than 3 years have not signed an extension contract as below:</p> <ul style="list-style-type: none"> a. Employee No.: PMM0065 (PKPOM) b. Employee No.: PMM0135 (PKPOM) c. Employee No.: PMM0077 (PKPOM) d. Employee No.: PTE3061 (PTE) e. Employee No.: PTE3068 (PTE) f. Employee No.: PTE5005 (PTE) g. Employee No.: UJE0822 (UE) h. Employee No.: UJE0848 (UE) i. Employee No.: UJE0783 (UE) j. Employee No.: UJE0004 (UE) <p>Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.</p> | <p>Complied</p> |
| <p>6.5.3</p> <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance -</p> | <p>Clinic facilities were provided free to the workers and emergency ambulance was sighted. The company has subsidized RM 5 for electricity usage and RM 7.70 for water usage to the workers. Basic recreational facilities such as futsal field, community hall and mosque was available in the sites.</p> <p>Linesite inspection was carried out on weekly basis by using Weekly Linesite Inspection form by Hospital Assistant in mill, Pamol Timur Estate and Unijaya Estate. VMO has acknowledged on the inspection form. Last inspection was carried out on November 2018. Besides, VMO will conducted the linesite inspection with the Hospital Assistant as well on weekly basis. Last inspection with VMO was carried out on 21/11/2018 in Pamol Timur Estate.</p> | <p>Complied</p> |

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| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|-----------------|
| 6.5.4 | <p>Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p> | <p>Complied</p> |
| <p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | |
| 6.6.1 | <p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p> | <p>Complied</p> |
| 6.6.2 | <p>Minutes of meetings with main trade unions or workers representatives shall be documented.</p> <p>- Minor compliance -</p> | <p>Complied</p> |
| <p>Criterion 6.7: Children are not employed or exploited.</p> | | |
| 6.7.1 | <p>There shall be documentary evidence that minimum age requirements are met.</p> <p>- Major compliance -</p> | <p>Complied</p> |
| <p>Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p> | | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|------------|
| 6.8.1 A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance - | IOI Corporation Berhad has implemented Equal Opportunity Employment & Freedom of Association Policies dated October 2017 in both languages where all the workers will receive equal treatment based on their relevant merits and competency regardless of gender, race, caste, nationality, religion, age, physical condition, sexual orientation, marital status, union membership or political affiliation. The policy has been displayed at the notice board in front of the office and briefing was given to the workers on 9/11/2018 in Pamol Kluang POM, 13/7/2018 in Pamol Timur Estate, 16,22-23/11/2018 in Unijaya Estate and during external stakeholder meeting for external stakeholders. | Complied |
| 6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance - | Interviewed with the workers consisted of different nationalities and different gender confirmed that they are treated equally without any discrimination. The workers were provided with standard treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone. | Complied |
| 6.8.3 It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance - | IOI Group has developed Foreign Workers Recruitment Guideline & Procedures in Malaysia dated October 2017. The objective of the procedure is to provide clarity and transparency on the processes of hiring foreign workers and to ensure the hiring activities are in accordance to the Group's Sustainability Palm Oil Policy. Besides, the company also developed recruitment procedure for local employees where the recruitment was based on the job analysis where necessary skills, qualifications, experiences and characteristic. The sources of recruitment are such as through company's website, walk-in interview, advertisement and employee referral. Interviewed with the local communities confirmed that job opportunity was provided to them by the management. | Complied |
| Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected. | | |
| 6.9.1 Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance - | The company has implemented Policy on Harassment at Workplace dated June 218 where the company is committed to promote a safe and healthy working environment. The company has zero tolerance for any form of harassment at workplace. The policy serves as a guidance on handling matters related to harassment. The policy has been displayed at the notice board in front of the office and briefing was given to the workers on 9/11/2018 in Pamol Kluang POM, 13/7/2018 in Pamol Timur Estate, 16,22-23/11/2018 in Unijaya Estate and during external stakeholder meeting for external stakeholders. | Complied |

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| Criterion / Indicator | Assessment Findings | Compliance |
|--|---|------------|
| 6.9.2 A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance - | The company has developed Protection of Reproductive Rights Policy dated 2/7/2015 where the company is committed to provide protection of reproductive rights in the employment. Reproductive decision-making including voluntary choice in marriage, family formation and determination of the number, timing and spacing. The policy has been displayed at the notice board in front of the office and briefing was given to the workers on 9/11/2018 in Pamol Kluang POM, 13/7/2018 in Pamol Timur Estate, 16,22-23/11/2018 in Unijaya Estate and during external stakeholder meeting for external stakeholders. | Complied |
| 6.9.3 A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance - | The company has implemented Sexual Harassment Reporting Flowchart to elaborate how the process of sexual harassment complaint can be made. Besides, the company also implemented Policy on Harassment at Workplace where the company will keep all the grievances related to sexual harassment as confidential and the victim can remain anonymous. Gender Committee has been established in the mill and meeting was carried out once every 6 months. Seen the meeting minutes dated 31/10/2018 in Pamol Kluang POM, 26/9/2018 in Pamol Timur Estate and 28/9/2018 in Unijaya Estate. Besides, the committee in the mill and estates have implemented Sexual Harassment Report Book and monitor on monthly basis whether if there is any case related to sexual harassment reported. No issues reported during the meeting and verified through interviewed with the female workers. | Complied |
| Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses. | | |
| 6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance - | Pamol Kluang Palm Oil Mill processes FFB from company owned estates only. No FFB purchased from out-growers or smallholders. | Complied |
| 6.10.2 Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance - | Pamol Kluang Palm Oil Mill processes FFB from company owned estates only. No FFB purchased from out-growers or smallholders. | Complied |
| 6.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance - | Sampled of contract agreements with the contractors as below: a. Company No.: 36374-K for transporting CPO which valid from 1/9/2017 to 31/8/2019. b. Contract No.: PMM/018-18/19 for grass cutting at mill area which valid from 1/7/2018 to 30/6/2019. c. Contract No.: PTE/002-18/19 for transporting/loading FFB and garbage collection which valid from 1/7/2018 to 30/6/2019. | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|----------------|
| 6.10.4 | Agreed payments shall be made in a timely manner. - Minor compliance - | For CPO transporter, the payment term is made not later than 45 th days after the transporter has submitted the supporting documents such as weighbridge tickets and invoices in the beginning of the following month. For other contractors, the payment will be made not later than 30/ 60/ 90 days of invoice date or completion work. Sampled of the invoices and payment vouchers as below: a. Invoice date: 29/10/2018, Payment Voucher# 012/11 dated 12/11/2018 for grass cutting contractor b. Invoice dated 30/9/2018, Payment Voucher# PBV-048/10/18 dated 25/10/2018 for CPO transporter c. Invoice #001 dated 31/10/2018, Payment Voucher# 007/11 dated 9/11/2018 for FFB transporter/ loader | Complied |
| Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate. | | | |
| 6.11.1 | Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance – | The company has made contribution to the local communities such as subsidized of RM 16/month/child bus transportation to school and verified through the Detail Expenditure Ledger. Besides, donation to the schools’ activities such as sport day was sighted with the Petty Cash Voucher# 6942 dated 8/8/2018. The management also provided facilities such as futsal court and community hall to the school upon request and responded to the request formally to the school. The management has provided mosque for the local communities to pray on Friday. | Complied |
| 6.11.2 | Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance – | Not applicable as there was no scheme smallholders involve in the certification unit. | Not applicable |
| Criterion 6.12: No forms of forced or trafficked labour are used. | | | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|-----------------|
| <p>6.12.1</p> <p>There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p> | <p>The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers and contract workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below:</p> <ul style="list-style-type: none"> a. Permit No.: PE 1567139 valid until 10/9/2019 (PKPOM) b. Permit No.: PE 2000374 valid until 7/11/2019 (PKPOM) c. Permit No.: PE 0556566 valid until 21/5/2019 (PKPOM) d. Permit No.: PD 9707948 valid until 5/1/2019 (PKPOM) e. Permit No.: PE 0810370 valid until 12/6/2019 (PTE) f. Permit No.: PE 0492245 valid until 21/4/2019 (PTE) g. Permit No.: PE 0331644 valid until 21/4/2019 (PTE) h. Permit No.: PE 1448522 valid until 17/7/2019 (PTE) i. Permit No.: PD 9708204 valid until 9/1/2019 (PTE Contract Worker) j. Permit No.: PE 0562342 valid until 5/5/2019 (PTE Contract Worker) k. Permit No.: PE 0141585 valid until 9/2/2019 (PTE Contract Worker) l. Permit No.: PE 0492099 valid until 21/4/2019 (UE) m. Permit No.: PE 1690232 valid until 29/9/2019 (UE) n. Permit No.: PE 6015508 valid until 29/10/2019 (UE) o. Permit No.: PE 1442071 valid until 20/8/2019 (UE) <p>Interviewed with the workers confirmed that they are restricted to move around by the company. They have the freedom to choose to keep the passport by themselves or keep in the office for safety purpose. Safety lockers were sighted in the office for the workers to keep their passport and key was hold by the workers.</p> | <p>Complied</p> |
| <p>6.12.2</p> <p>Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –</p> | <p>Interviewed with the foreign workers confirmed that no contract substitution occurred. The contract they signed in their home origin has the similar terms and conditions as they signed in plantations. The job and salary offered by the company is similar as the agent promised in their home origin.</p> | <p>Complied</p> |

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| Criterion / Indicator | Assessment Findings | Compliance |
|--|---|----------------|
| 6.12.3 Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance - | IOI Group has developed Special Labour Policy and Procedures where the company has included the following measures to be implemented as below: <ul style="list-style-type: none"> a. Emphasize Equal Opportunity Employment and Freedom of Association Policy which clearly states the IOI's non-discriminatory practices. b. Ensure that there is no contract substitution. Contract signed in home country shall not differ from the contract on arrival in Malaysia. c. Conduct training for all foreign workers upon arrival in Malaysia by using orientation program materials which focuses on language, cultural practices, safety and Malaysia laws. d. Provide decent living conditions by using Worker's Minimum Standard Housing and Amenities Act 1990 as a guide. Document reviewed and site visited found that the mill has provided induction training during their arrival to the mill. Seen the Induction Training for New Workers dated 2/11/2018 for total 3 workers in Pamol Kluang POM, 25/10/2018 for total 1 worker in Pamol Timur Estate and 23/11/2018 for 1 worker in Unijaya Estate with the program of induction was sighted. A translator was attended during the induction training. | Complied |
| Criterion 6.13: Growers and millers respect human rights. | | |
| 6.13.1 A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance - | IOI Group has developed Sustainable Palm Oil Policy dated March 2018 where the company respects and uphold the rights of all workers, including contract, temporary and migrant workers in accordance with the Universal Declaration of Human Rights, International Labour Organization's core conventions, United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labour in Palm Oil Production. The policy has been displayed at the notice board in front of the office and briefing was given to the workers on 9/11/2018 in Pamol Kluang POM, 13/7/2018 in Pamol Timur Estate, 16,22-23/11/2018 in Unijaya Estate and during external stakeholder meeting for external stakeholders. | Complied |
| 6.13.2 As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. | Not applicable in Peninsular Malaysia. | Not applicable |
| Principle 7: Responsible development of new plantings | | |
| Pamol Kluang Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area. | | |
| Principle 8: Commitment to continual improvement in key areas of activity | | |
| Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations. | | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|--|---|-----------------|
| <p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. <p>- Major compliance -</p> | <p>The ongoing management improvement plan for HCV and RTE were implemented such as (a) Ensuring conformance to legal requirements relating to the protection of the species or habitat are met; (b) Avoiding damage to and deterioration of HCV habitats such as by ensuring that buffer zones around HCV areas are created; (c) Educate employees, erection of signages at the estates, and controlling any illegal or inappropriate hunting, fishing or collecting activities.</p> | <p>Complied</p> |

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Appendix B: Approved Time Bound Plan

Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd (June 2018)

| No. | PMU | Main assessment | Certification status | Status | Updated Information for Partial Certification, Clause 4.2.4 RSPO Certification Systems for Certified and Uncertified Units |
|-----|--------------------------|-----------------|------------------------------|--|--|
| 1. | Pamol (Sabah) POM, Sabah | May 2008 | Recertified in November 2016 | Included Sugut Estate as an additional supply base through the scope of certification extension in September 2017 RSPO ASA-01. | No outstanding issues |
| 2. | Sakilan POM | Nov 2008 | Recertified in Mar 2015 | ASA-03 completed in December 2017. | No outstanding issues |
| 3. | Pamol Kluang POM | Mar 2009 | Recertified in Mar 2015 | ASA-03 completed in Dec 2017. | No outstanding issues |
| 4. | Gomali POM | Aug 2009 | Recertified in Aug 2015 | ASA-02 completed in June 2017. | No outstanding issues |
| 5. | Baturong POM | Sept 2009 | Recertified in Oct 2015 | ASA-02 completed in July 2017. | No outstanding issues |
| 6. | Bukit Leelau POM | Apr 2010 | Recertified in Nov 2015 | ASA-02 completed in September 2017. | No outstanding issues |
| 7. | Mayvin POM | Aug 2010 | Recertified in Dec 2015 | ASA-02 completed in October 2017. | No outstanding issues |
| 8. | Pukin POM, Pahang | Dec 2010 | Recertified in June 2016 | ASA-02 completed in March 2018. | No outstanding issues |
| 9. | Leepang (Sabah) POM | Aug 2012 | Recertified in dec 2013 | ASA-04 completed in October 2017. | No outstanding issues |
| 10. | Syarimo POM | Sept 2012 | Recertified in Mar 2018 | Recertification audit completed in January 2018. | No outstanding issues |
| 11. | Ladang Sabah POM | Oct 2012 | Recertified in July 2018 | Recertification audit completed in January 2018. | No outstanding issues |
| 12. | Morisem POM, Sabah | Sept 2013 | Certified in Dec 2013 | ASA-04 completed in | No outstanding issues |

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| No. | PMU | Main assessment | Certification status | Status | Updated Information for Partial Certification, Clause 4.2.4 RSPO Certification Systems for Certified and Uncertified Units |
|-----|-----------------------|-----------------|----------------------|---|--|
| | | | | September 2017. | |
| 13. | IOI – Pelita, Sarawak | Planned - 2020 | Uncertified Unit | New certification for IOI – Pelita (Sarawak) is pending resolution of land dispute and RSPO decision. No POM yet. | <p>Two meetings in March and April 2018 has been held with RSPO and Grassroots to determine the direction of the resolution plan and IOI had addressed every concern and omments raised by the Complaints Panel (CP).</p> <p>Two socialization process to determine the best mechanism to handle dispute cases has been done with the all respective communities has been conducted in March 2018 collecting feedback and comments from the communities regarding the workplan.</p> <p>The revision of the resolution plan has took place in April 2018 which involving the involvement of more stakeholders including authorities to come on board and resolve the dispute case. The first measures to be taken on the ground is to conduct the perimeter survey and community mapping, which IOI has hired two new field staff to conduct such activities once they are on board in early May 2018.</p> <p>In addition, Corporate Social Responsibility (CSR) activities is actively being conducted on the ground such as road repairs in Long Teran, Long Tuyut, and Long Jegan road. The construction materials to the local communities in Long Teran Batu has also been delivered in mid May 2018 before Gawai festival.</p> <p>Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/status-of-complaints/view/4</p> |
| 14. | Unico POM-1, Sabah | Planned - 2018 | Uncertified Unit | Acquired in 2014. Established OP plantation (before 2005). Supply base do consist of external/independent smallholders. | <p>Undergo its first RSPO Audit on (09th – 13th April 2018)</p> <p>Outgrowers are not part of the main assessment whereas risk assessment was conducted during the audit.</p> |

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| No. | PMU | Main assessment | Certification status | Status | Updated Information for Partial Certification, Clause 4.2.4 RSPO Certification Systems for Certified and Uncertified Units |
|-----|-------------------------|--------------------|----------------------|---|---|
| 15. | Unico Desa POM-2, Sabah | Planned - Dec 2017 | Uncertified Unit | Acquired in 2014. Established OP plantation (before 2005). Supply base comprised of own estates. | No outstanding issues Outgrowers are not part of the certified area |
| 16. | PT SKS, Indonesia | Planned - 2017 | Uncertified Unit | Acquired in 2009 (new concession land). POM was commission in Feb 2015 and Governmental 'Hak Guna Usaha' (HGU) application in progress. | Update on the RSPO Suspension and complaint by Aidenvironment – Final verification by RSPO CP was conducted in end of January 2018. Final report on the feedback from the verification visit is yet to be shared by the RSPO CP. Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/status-of-complaints/view/80 Certification preparations in progress. Pending issuance of HGU. |
| 17. | PT BNS, Indonesia | Planned - 2017 | Uncertified Unit | Acquired in 2009 (new concession land). POM was commission in Feb 2015 and Governmental HGU application in the process. | Update on the RSPO Suspension and complaint by Aidenvironment – Final verification by RSPO CP was conducted in end of January 2018. Final report on the feedback from the verification visit is yet to be shared by the RSPO CP. Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/status-of-complaints/view/80 Certification preparations in progress. Pending issuance of HGU. |
| 18. | PT BSS, Indonesia | Planned 2019 | Uncertified Unit | Acquired in 2009 (new concession land). No POM yet, still in development phase. Governmental 'Hak Guna Usaha' application in progress. | Update on the RSPO Suspension and complaint by Aidenvironment – Final verification by RSPO CP was conducted in end of January 2018. Final report on the feedback from the verification visit is yet to be shared by the RSPO CP. Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/status-of-complaints/view/80 Certification preparations in progress. Pending issuance of HGU. |
| 19. | PT KPAM, Indonesia | Planned - 2020 | | Acquired in 2010 (new concession land). | RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP |

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| No. | PMU | Main assessment | Certification status | Status | Updated Information for Partial Certification, Clause 4.2.4 RSPO Certification Systems for Certified and Uncertified Units |
|-----|---------------------|---------------------|----------------------------|---|---|
| | | | | No POM planned yet, all necessary permits are up to date. | public notification could be assessed through the link below: https://rspo.org/certification/new-planting-procedures/public-consultations/loi-group-pt-kalimantan-prima-agro-mandiri HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below: http://highcarbonstock.org/registered-hcs-assessments/ |
| 20. | Sugut Estate, Sabah | Planned – Sept 2017 | Certified in November 2017 | Sugut estate was included as part of the Pamol Sabah POM supply base and has been audited by Certification Body, Intertek on 12 th Sept 2017. RSPO certification has been successfully granted beginning November 2017. | No outstanding issue. |

*Previously certified under multi mill certification. The recertification changed to single mill and its supply base

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2018** for **Pamol Kluang POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2018** for **Pamol Kluang POM** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.21 |
| PKO | 1.21 |

| Extraction | % |
|------------|-------|
| OER | 22.49 |
| KER | 4.87 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 258,182.71 |
| CPO Produced | 58,061.83 |
| PKO Produced | 12,581.84 |

| Land Use | Ha |
|-----------------------------|-----------------|
| OP Planted Area | 10,872.00 |
| OP Planted on peat | 0 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 81.15 |
| Total | 10953.15 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 101,383.59 | 0.39 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| CO ₂ Emission from fertilizer | 13,197.51 | 0.05 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| NO ₂ Emmision | 10,262.79 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Fuel Consumption | 1,613.94 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Peat Oxidation | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Sink | | | | | | | | |
| Crop Sequestration | 96,098.19 | -0.37 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Conservation Sequestration | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | 30,359.64 | 0.12 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 50,608.18 | 0.2 |
| Fuel Consumption | 156.37 | 0 |
| Grid Electricity Utilisation | 4,408.7 | 0.02 |
| Credit | | |
| Export of Grid Electricity | 0 | 0 |
| Sales of PKS | 0 | 0 |
| Sales of EFB | 0 | 0 |
| Total | 55,173.25 | 0.21 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 15,233.65 |
| PK from other source | 0.00 |
| Fuel Consumptions | 0.00 |
| Total Crusher emissions | 15,233.65 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|------|
| Divert to Compost (%) | 0.00 |
| Divert to anaerobic diversion (%) | 100 |

| POME Diverted to Anaerobic Digestion: | |
|--|-----|
| Divert to anaerobic pond (%) | 100 |
| Divert to methane captured (flaring) (%) | 0 |
| Divert to methane captured (energy generation) (%) | 0 |

Appendix D: General Chain of Custody Requirements for the Supply Chain

| 5.1 Applicability of the general chain of custody requirements for the supply chain | | | |
|--|---|--|--|
| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| 5.1.1 | The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification. | IOI Commodity Trading Sdn Bhd (Pamol Plantations Sdn Bhd) takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK. | Yes |
| 5.1.2 | Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model. | Pamol Kluang POM is not a trader or distributor. | N/A |
| 5.1.3 | Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform. | IOI Corporation Berhad held RSPO membership number: 2-0002-04-000-00 since 17 May 2004. Company has registered in PalmTrace system as follows: Members ID – Pamol Kluang Palm Oil Mill: RSPO_PO10000000109 Licence valid until 15/3/2019 Member category : Oil Mill | Yes |
| 5.1.4 | Processing aids do not need to be included within an organization’s scope of certification. | Processing aids was not in used at Pamol Kluang Palm Oil Mill. | N/A |
| 5.2 Supply chain model | | | |

| | | | |
|-----------------------------------|---|---|-----|
| 5.2.1 | The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance. | The mill has only received all the certified FFB from its certified estates which belongs to IOI Corporation Berhad. SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was developed to identify, segregating and recording the product by suitable means from receipt and during all the stages of production, storage, delivery and sales. Downgrading can be done and explained in the procedure. During the period of December 2017 – October 2018, Pamol Kluang Palm Oil Mill has received and processed FFB from own plantations: 203,203.29 MT with Module D (Identity Preserved) for supply chain model. | Yes |
| 5.2.2 | The site can use one (1) or a combination of supply chain models as audited and certified by the CB. | Pamol Kluang Palm Oil Mill was certified with Identity Preserved Module. | Yes |
| 5.3. Documented Procedures | | | |
| 5.3.1 | The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. | SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was developed to identify, segregating and recording the product by suitable means from receipt and during all the stages of production, storage, delivery and sales. The procedure has explained the management review, internal audit, supply chain models and records, internal control system, process of loading FFB from estates and inspections during arrival in mill, handling complaints and handling non-conformities. | Yes |
| | <ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). | Among the records included in the procedure are as below: <ul style="list-style-type: none"> a. Weighbridge tickets b. Daily Production Reports c. Invoice and contracts | Yes |

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| | | <p>d. Summary of internal audit e. Delivery and storage records f. Training records</p> <p>Training records for supply chain was sighted where the training was conducted on 29/6/2019 for the critical control point responsible person. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure.</p> | |
| | <ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. | <p>SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 has identified every responsible personal who involved in the implementation RSPO Supply Chain Certification. Mill Manager or Assistant Mill Manager is the person in charge to ensure the implementation and maintenance of RSPO Supply Chain requirements. The Assistant Manager has been appointed as RSPO & MSPO Supply Chain Officer for Pamol Kluang POM and appointment letter dated 10/11/2017 was sighted.</p> | Yes |
| 5.3.2 | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> | <p>SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was developed to outline the process of internal audit and the internal audit needs to be carried out at least once a year which covered for RSPO SCCS requirements. However, the requirements of RSPO Market Communications and Claims has yet to be included into the procedure.</p> | Major Non-Compliance |
| | <p>ii) effectively implements and maintains the standard requirements within its organization</p> | <p>Internal audit was carried out on 10/10/2018 for RSPO Supply Chain Certification. Total 1 non-conformance was raised. However, the audit was only covered the Module D: Identity Preserved. Requirements of Chain of Custody and RSPO Market Communications and Claims</p> | Major Non-Compliance |

| | | | |
|--|---|--|-----------------------------|
| | | <p>Documents have not been audited during the internal audit.</p> <p>Thus, a major non-conformance raised.</p> | |
| <p>5.4. Purchasing and goods in</p> | | | |
| <p>5.4.1</p> | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number | <p>The Daily Production Reports are prepared at the Laboratory. Month End Production Reports summary are documented for all the certified FFB. Records verified by internal and external audit. When FFB delivered to the mill from the estates, the transporters presented platform chits/ weighbridge tickets/ FFB consignment note to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the platform chits/ weighbridge tickets/ FFB consignment note/ Despatch note are as follow:</p> <ul style="list-style-type: none"> a. Name of Estate: Kahang Estate Delivery Date: 30/10/2018 Quantity: 45.66 MT Field No.: 091/09J, 02F/05F and 07E/01A Despatch No.: 17071 Product: FFB RSPO Certificate No.: SPO 547027 b. Name of Estate: Mamor Estate Delivery Date: 30/10/2018 Quantity: 28.94 MT Field No.: 97D/05A/04E Despatch No.: 50103 Product: FFB RSPO Certificate No.: SPO 547027 | <p>Major Non-Compliance</p> |

| | | | |
|--|--|---|--|
| | | <p>c. Name of Estate: Unijaya Estate Delivery Date: 30/10/2018 Quantity: 24.06 MT Field No.: 15A/11B/10A Despatch No.: 51269 Product: FFB No RSPO Certificate No.</p> <p>d. Name of Estate: Swee Lam Estate Delivery Date: 30/10/2018 Quantity: 34.11 MT Field No.: 10A/13A/93A Despatch No.: 58035 Product: FFB – Certified Sustainable FFB RSPO Certificate No.: SPO 547027</p> <p>Sampled of weighbridge tickets/ FFB consignment note/ Despatch note below found not following the minimum information:</p> <p>a. Kahang Estate and Mamor Estate did not include the Certified Sustainable FFB stamping and the RSPO Certificate Number was stated as SPO 547027 instead of RSPO 547027 in Despatch Number. (Despatch No.: 17071 and Despatch No.: 50103)</p> <p>b. Unijaya Estate did not include the RSPO Certificate Number and only mentioned the product as FFB in Despatch Number. (Despatch No.: 51269)</p> | |
|--|--|---|--|

| | | | |
|-------|--|---|-----|
| | | RSPO Certificate Number stated in Despatch Note of Swee Lam Estate was SPO 547027 instead of RSPO 547027. (Despatch No.: 58035) | |
| | <ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | The information was available in various documents as mentioned above. | Yes |
| | <ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. | Details refer to indicator 5.7.2. | Yes |
| | <ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. | Not applicable. The facility is a palm oil mill. | N/A |
| | <ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. | Not applicable. The facility is a palm oil mill. | N/A |
| 5.4.2 | The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. | SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was developed to explain the process of handling non-conformities. Background check on supplier before handling RSPO products was conducted by the Security as verified through interviewed with the Security. There was no non-conformance product has been received so far. | Yes |

| 5.5. Outsourcing activities | | | |
|------------------------------------|--|--|----------------------------------|
| 5.5.1 | <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p> | <p>The list of stakeholders was sighted where it has included the transport contractors for CPO. Total 6 CPO transporters have been engaged by the mill. Agreements for all the CPO transporters were sighted and sampled as below:</p> <ul style="list-style-type: none"> a. Company No.: 194089-M which valid from 1/9/2017 to 31/8/2019. b. Company No.: 301693-T which valid from 1/9/2017 to 31/8/2019. c. Company No.: 21873-W which valid from 1/9/2017 to 31/8/2019. <p>The agreement has included the parties need to be complied with the RSPO requirements and has been acknowledged by the contractors.</p> | Yes |
| 5.5.2 | <p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ul style="list-style-type: none"> a. The site has legal ownership of all input material to be included in outsourced processes; b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. | <p>The mill ensures that an outsourced activity (transportation) is not contaminated with non-certified materials. There is no outsourced process within Pamol Kluang Palm Oil Mill, hence this requirement is not applicable.</p> <p>The mill ensures that an outsourced activity (transportation) is not contaminated with non-certified materials. There is no outsourced process within Pamol Kluang Palm Oil Mill, hence this requirement is not applicable.</p> <p>The mill ensures that an outsourced activity (transportation) is not contaminated with non-certified materials. There is no outsourced process within Pamol Kluang Palm Oil Mill, hence this requirement is not applicable.</p> | <p>N/A</p> <p>N/A</p> <p>N/A</p> |

| | | | |
|---------------------------------|--|---|-----|
| | d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance. | The mill ensures that an outsourced activity (transportation) is not contaminated with non-certified materials. There is no outsourced process within Pamol Kluang Palm Oil Mill, hence this requirement is not applicable. | N/A |
| 5.5.3 | The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. | The mill ensures that an outsourced activity (transportation) is not contaminated with non-certified materials. There is no outsourced process within Pamol Kluang Palm Oil Mill, hence this requirement is not applicable. | N/A |
| 5.5.4 | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products. | No new contractor used for the processing or physical handling of RSPO certified oil palm products (transportation). | N/A |
| 5.6. Sales and goods out | | | |
| 5.6.1 | <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number | <p>Pamol Kluang POM ensured the required information is available in document form.</p> <p>CSPO:</p> <p>a. Contract No.: C15763/1806 dated 31/5/2018; Quantity: 800 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXX • The name and address of the seller: IOI Commodity Trading Sdn Bhd (Pamol POM) • The loading or shipment/ delivery date: 5/6/2018 • The date on which the documents were issued: 5/6/2018 • A description of the product: RSPO-IP • The quantity of the products delivered: 32.68 MT • Any related transport documentation: NAM 2136 • Supply chain certificate number: RSPO 547027 • A unique identification number (WB Ticket No.): 80434 | Yes |

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|--|--|---|------------|
| | | <p>All the oils have been shipped out from 5/6/2018 to 25/6/2018 as verified in the Daily CSPO Despatch Detail Report.</p> <p><u>CSPK:</u></p> <p>a. Contract No.: C15051/1712 dated 8/9/2017; Quantity: 200 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXX • The name and address of the seller: IOI Commodity Trading Sdn Bhd (Pamol POM) • The loading or shipment/ delivery date: 17/12/2017 • The date on which the documents were issued: 17/12/2017 • A description of the product: RSPO-SG • The quantity of the products delivered: 39.94 MT • Any related transport documentation: KBJ 2095 • Supply chain certificate number: RSPO 547027 • A unique identification number (WB Ticket No.): 23117 <p>All the PKs have been shipped out from 17/12/2017 to 8/1/2018 as verified in the Daily CSPK Despatch Detail Report.</p> <p>However, the RSPO certificate number</p> | |
| | <ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | <p>Seen the weighbridge ticket, shipping documents as per above sampled.</p> | <p>Yes</p> |
| | <ul style="list-style-type: none"> • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. | <p>Pamol Kluang POM ensured the required information is available in document form. Sampled of contracts and weighbridge tickets as below:</p> <p><u>CSPO:</u></p> | <p>Yes</p> |

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|--|--|--|--|
| | | <p>a. Contract No.: C15763/1806 dated 31/5/2018; Quantity: 800 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXX • The name and address of the seller: IOI Commodity Trading Sdn Bhd (Pamol POM) • The loading or shipment/ delivery date: 5/6/2018 • The date on which the documents were issued: 5/6/2018 • A description of the product: RSPO-IP • The quantity of the products delivered: 32.68 MT • Any related transport documentation: NAM 2136 • Supply chain certificate number: RSPO 547027 • A unique identification number (WB Ticket No.): 80434 <p>All the oils have been shipped out from 5/6/2018 to 25/6/2018 as verified in the Daily CSPO Despatch Detail Report.</p> <p><u>CSPK:</u></p> <p>a. Contract No.: C15051/1712 dated 8/9/2017; Quantity: 200 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXX • The name and address of the seller: IOI Commodity Trading Sdn Bhd (Pamol POM) • The loading or shipment/ delivery date: 17/12/2017 • The date on which the documents were issued: 17/12/2017 • A description of the product: RSPO-SG • The quantity of the products delivered: 39.94 MT • Any related transport documentation: KBJ 2095 • Supply chain certificate number: RSPO 547027 • A unique identification number (WB Ticket No.): 23117 | |
|--|--|--|--|

| | | | |
|--|---|---|-----|
| | | <p>All the PKs have been shipped out from 17/12/2017 to 8/1/2018 as verified in the Daily CSPK Despatch Detail Report.</p> <p>According to the SOP, shipping announcement will be made by IOI Commodity Trading Sdn Bhd within 1 – 4 months from date of Bill of Ladings.</p> | |
| 5.7. Registration of transactions | | | |
| 5.7.1 | <p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. | <p>The registration of PalmTrace will be carried out by the IOI Commodity Trading Sdn Bhd in HQ.</p> <p>All transaction will be registered in the PalmTrace. Company has registered in PalmTrace system as follows: Members ID – Pamol Kluang Palm Oil Mill: RSPO_PO10000000109 Licence valid until 15/3/2019 Member category: Oil Mill</p> | Yes |
| 5.7.2 | <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. | <p>Based on the announcement summary, all the registrations were found to be in order.</p> <p>Sampled the shipping announcement for the contract below were sighted: CSPO: a. Contract No.: C15763/1806 dated 31/5/2018; Quantity: 800 MT</p> <ul style="list-style-type: none"> The name and address of the buyer: XXXXX The name and address of the seller: IOI Commodity Trading Sdn Bhd (Pamol POM) The loading or shipment/ delivery date: 5/6/2018 The date on which the documents were issued: 5/6/2018 A description of the product: RSPO-IP The quantity of the products delivered: 32.68 MT Any related transport documentation: NAM 2136 | Yes |

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| |  | <ul style="list-style-type: none"> • Supply chain certificate number: RSPO 547027 • A unique identification number (WB Ticket No.): 80434 • B/L Date: 16/6/2018 • Announcement Date: 4/7/2018 <p>CSPK:</p> <p>a. Contract No.: C15051/1712 dated 8/9/2017; Quantity: 200 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXX • The name and address of the seller: IOI Commodity Trading Sdn Bhd (Pamol POM) • The loading or shipment/ delivery date: 17/12/2017 • The date on which the documents were issued: 17/12/2017 • A description of the product: RSPO-SG • The quantity of the products delivered: 39.94 MT • Any related transport documentation: KBJ 2095 • Supply chain certificate number: RSPO 547027 • A unique identification number (WB Ticket No.): 23117 • B/L Date: 17/12/2018 • Announcement Date: 11/1/2018 <p>The shipping announcement was made according to the procedure which is between 1 month – 4 months from the date of Bill of Ladings.</p> | |
| | <ul style="list-style-type: none"> • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. | <p>Not applicable. Products are not sold beyond refinery.</p> | <p>N/A</p> |

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| | <ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. | There was volume sold for conventional (refer to Table 11 & 12; Supply Chain declaration of Table D & E; Summary Template). | Yes |
| | <ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. | Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly. | Yes |
| 5.8. Training | | | |
| 5.8.1 | The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff. | The mill has developed Sustainability Program for the Year 2018 where has included Critical Control Point training which covered for the requirements in RSPO SCCS. Training records for supply chain was sighted where the training was conducted on 29/6/2019 for the critical control point responsible person. | Yes |
| 5.8.2 | Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed. | Training records for supply chain was sighted where the training was conducted on 29/6/2019 for the critical control point responsible person. Seen the attendance list and interviewed with the attendees (weighbridge operator and Security Guard) confirmed that they are understand the procedure. | Yes |
| 5.9. Record Keeping | | | |
| 5.9.1 | The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. | Pamol Kluang POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. | Yes |
| 5.9.2 | Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. | SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was developed has defined the retention time for all the records and documents is minimum period of 2 years. | Yes |
| 5.9.3 | The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil | Forecast volume for March 2018 – February 2020 CSPO = 59,939.81 mt | N/A |

| | | | |
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| | palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. | CSPK = 12,753.15 mt | |
| 5.10. Conversion factors | | | |
| 5.10.1 | Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. | Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average was 23.79% (OER) & 5.03% (KER). | Yes |
| 5.10.2 | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | The facility is using the actual extraction rate and therefore updating of rates is not necessary. | Yes |
| 5.11. Claims | | | |
| 5.11.1 | The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims. | RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has obtained Trademark License from RSPO and seen the trademark license# 2-0002-04-100-03 which valid from 19/12/2017 to 18/12/2019. | Yes |
| General corporate communications | | | |
| 4.1 | A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim. | No off-product claim made by Pamol Kluang POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). | Yes |
| 4.2 | In corporate communications a member is allowed to: a. Display its RSPO membership status | Not applicable as no off-product claim made by Pamol Kluang POM as to date. | N/A |

| | | | |
|--|--|---|-----|
| | <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p> | | |
| 4.3 | In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | Not applicable as no off-product claim made by Pamol Kluang POM as to date. | N/A |
| 4.4 | Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products. | Not applicable as no off-product claim made by Pamol Kluang POM as to date. | N/A |
| 4.5 | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat. | No evidence of RSPO corporate logo used by Pamol Kluang POM and verified through document and site review (notice board, business card, shipping documentation, procurement/purchasing document and promotional material etc). | Yes |
| Business to business communications | | | |
| 5.1 | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products. | Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. No claims have been made. | Yes |
| 5.2 | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with Palm Kernel-CSPK/IP and RSPO certificate number: RSPO 547027. Refer to weighbridge ticket number 23254 dated 4/7/2018. No claims have been made. | Yes |

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| 5.3 | <p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <ul style="list-style-type: none"> a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. | <p>Pamol Kluang POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.</p> | N/A |
| 5.4 | <p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p> | <p>Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.</p> | N/A |
| Business to consumer communication | | | |
| 6.1 | <p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.</p> | <p>No business to consumer communication on product specific claim made by Pamol Kluang POM and only produce crude and unfinished product. This is not applicable for POM.</p> | N/A |

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| 6.2 | Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below. | No business to consumer communication on product specific claim made by Pamol Kluang POM and only produce crude and unfinished product. This is not applicable for POM. | N/A |
| 6.3 | When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present. | No business to consumer communication on product specific claim made by Pamol Kluang POM and only produce crude and unfinished product. This is not applicable for POM. | N/A |
| 6.4 | Business to consumer communication shall not include information about the claimant's RSPO membership status. | No business to consumer communication on product specific claim made by Pamol Kluang POM and only produce crude and unfinished product. This is not applicable for POM. | N/A |
| 6.5 | Members shall not communicate to consumers information about their suppliers' RSPO membership status. | No business to consumer communication on product specific claim made by Pamol Kluang POM and only produce crude and unfinished product. This is not applicable for POM. | N/A |
| 6.6 | Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient. | No business to consumer communication on product specific claim made by Pamol Kluang POM and only produce crude and unfinished product. This is not applicable for POM. | N/A |
| 6.7 | Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim. | No business to consumer communication on product specific claim made by Pamol Kluang POM and only produce crude and unfinished product. This is not applicable for POM. | N/A |
| 6.8 | RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to | No business to consumer communication on product specific claim made by Pamol Kluang POM and only produce crude and unfinished product. This is not applicable for POM. | N/A |

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| | <p>ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p> | | |
| <p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p> | | | |
| <p>Auditor Hint: <i>This specific rules shall be audited concurrently with the relevant Module A and Module B (including Module F & G) under the Supply Chain Modular Requirements</i></p> | | | |
| <p>Certified oil palm content (IP)</p> | | | |
| | <p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p> | <p>Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.</p> | <p>N/A</p> |
| | <p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p> | <p>Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.</p> | <p>N/A</p> |
| | <p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p> | <p>Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.</p> | <p>N/A</p> |
| <p>Labelling and trademark (IP)</p> | | | |
| | <p>Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch).</p> | <p>Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.</p> | <p>N/A</p> |

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| | In on-pack communications, the RSPO trademark can be printed anywhere on the pack. | | |
| Messaging (IP) | | | |
| | <p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. | Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product. | N/A |
| MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES | | | |
| | <p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p> | Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product. | Yes |

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| | <p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p> | <p>Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.</p> | <p>Yes</p> |
| 5.12. Complaints | | | |
| 5.12.1 | <p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p> | <p>SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was developed which covered the process of handling complaints from internal and external stakeholders. The complaints can be done according to Grievance Procedure. Total 4 customer complaints received for the period from December 2017 to October 2018. All the complaints have resolved and closed.</p> | <p>Yes</p> |
| 5.13. Management Review | | | |
| 5.13.1 | <p>The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.</p> | <p>SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was developed which covered management review, which need to be conducted at least once a year at planned interval. The last management review meeting was conducted on 19/11/2018 for the Pamol Kluang region for sustainability matters.</p> | <p>Yes</p> |
| 5.13.2 | <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. | <p>The management review for Pamol Kluang POM was conducted on 19/11/2018, chaired by the Senior Assistant Mill Manager in Charge. All the inputs have been discussed accordingly, eg: Results of internal audits covering RSPO Supply Chain Certification Standard, Customer feedback, Status of preventive and corrective actions, Follow-up actions from management</p> | <p>Yes</p> |

| | | | |
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| | <ul style="list-style-type: none"> Follow-up actions from management reviews. Changes that could affect the management system. Recommendations for improvement. | reviews, Changes that could affect the management system, Recommendations for improvement. | |
| 5.13.3 | <p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> Improvement of the effectiveness of the management system and its processes. Resource needs. | The management review for Pamol Kluang POM was conducted on 19/11/2018, chaired by the Senior Assistant Mill Manager in Charge. All the outputs have been discussed accordingly. | Yes |

Appendix E : CPO Mill Supply Chain Assessment Report (Module *D* - CPO Mills: *Identity Preserved*)

| D.1 Definition | | | |
|------------------------|---|---|--|
| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| D.1.1 | A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable. | Pamol Kluang Palm Oil Mill only receives certified FFB from own certified supply bases. Therefore, qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. | Yes |
| D.2 Explanation | | | |

| | | | |
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| D.2.1 | <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> | <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p> | Yes |
| D.2.2 | <p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p> | <p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace. The registration of PalmTrace will be carried out by the IOI Commodity Trading Sdn Bhd in HQ. Company has registered in PalmTrace system as follows: Members ID – Pamol Kluang Palm Oil Mill: RSPO_PO10000000109 Licence valid until 15/3/2019 Member category: Oil Mill</p> <p>Sample of palm trace transaction checked:</p> <ul style="list-style-type: none"> a. Transaction ID: TR-8644ab80-b444, dated 4/7/2018 Product: CSPO-IP Volume: 800.59 MT b. Transaction ID: TR-9410b319-8530, dated 11/1/2018 Product: CSPK-IP Volume: 200 MT | Yes |
| D.3 Documented procedures | | | |

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| | | | |
|------------------------------------|---|--|-----|
| D.3.1 | <p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> | <p>Latest written documented procedure, SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was developed for the chain of custody with Identity Preserved (IP) model covering all the RSPO SCC System and Standard requirement. This SOP is revised based on the RSPO SCCS 14 June 2017.</p> | Yes |
| | <p>b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site’s procedures for the implementation of this standard.</p> | <p>The Assistant Manager has been appointed as RSPO & MSPO Supply Chain Officer for Pamol Kluang POM and appointment letter dated 10/11/2017 was sighted. Besides, Manager of Operation in Head Office has been appointed as person in charge to arrange and coordinate all activities relating to RSPO Supply Chain Internal Control System and appointment letter dated 21/9/2012 was sighted. Interviewed with the Assistant Manager have awareness of the supply chain system.</p> | Yes |
| D.3.2 | <p>The site shall have documented procedures for receiving and processing certified FFBs.</p> | <p>Pamol Kluang Palm Oil Mill has documented procedures (as per above in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.</p> | Yes |
| D.4 Purchasing and goods in | | | |
| D.4.1 | <p>The site shall verify and document the tonnage and sources of certified FFBs received.</p> | <p>The mill has maintained daily records are prepared at the entry point at the weighbridge. Daily Production Report and Month End Production Report documented for all the certified FFB was sighted. Records verified by internal and external audit.</p> | Yes |
| D.4.2 | <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> | <p>The facilities aware of this procedure and stated in the procedure, SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018 was</p> | Yes |

| | | | |
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| | | developed which explain on the process to inform CB if there is any overproduction. | |
| D.5 Record keeping | | | |
| D.5.1 | <p>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p><i>IP Mill must report on real time basis.</i></p> | <p>All the inventory records are maintained and updated on daily basis and monthly. Daily records are prepared at the entry point at the weighbridge.</p> <p>Pamol Kluang POM ensured the required information is available in document form. Sampled of contracts and weighbridge tickets as below:</p> <p><u>CSPO:</u></p> <p>a. Contract No.: C15763/1806 dated 31/5/2018; Quantity: 800 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXX • The name and address of the seller: IOI Commodity Trading Sdn Bhd (Pamol POM) • The loading or shipment/ delivery date: 5/6/2018 • The date on which the documents were issued: 5/6/2018 • A description of the product: RSPO-IP • The quantity of the products delivered: 32.68 MT • Any related transport documentation: NAM 2136 • Supply chain certificate number: RSPO 547027 • A unique identification number (WB Ticket No.): 80434 <p>All the oils have been shipped out from 5/6/2018 to 25/6/2018 as verified in the Daily CSPO Despatch Detail Report.</p> <p><u>CSPK:</u></p> | Yes |

| | | | |
|-----------------------|--|---|-----|
| | | <p>a. Contract No.: C15051/1712 dated 8/9/2017; Quantity: 200 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXX • The name and address of the seller: IOI Commodity Trading Sdn Bhd (Pamol POM) • The loading or shipment/ delivery date: 17/12/2017 • The date on which the documents were issued: 17/12/2017 • A description of the product: RSPO-SG • The quantity of the products delivered: 39.94 MT • Any related transport documentation: KBJ 2095 • Supply chain certificate number: RSPO 547027 • A unique identification number (WB Ticket No.): 23117 <p>All the PKs have been shipped out from 17/12/2017 to 8/1/2018 as verified in the Daily CSPK Despatch Detail Report.</p> | |
| D.6 Processing | | | |
| D.6.1 | <p>The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.</p> | <p>During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing. No non-certified FFB received and verified based POM month end production report from December 2017 – October 2018.</p> <p>Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records. This ensures that 100% segregated materials are reached.</p> | Yes |

Supply Chain Declaration

| A. Monthly Records of Certified and Uncertified FFB Received since the last audit (December 17 – October 18) | | | | |
|---|---------------------|---|---|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply bases (mt) | Volume of FFB from uncertified supply bases (mt) | Total FFB/Month (mt) |
| 1 | December 2017 | 26,702.5 | | 26,702.5 |
| 2 | January 2018 | 20,065.27 | | 20,065.27 |
| 3 | February 2018 | 10,784.37 | | 10,784.37 |
| 4 | March 2018 | 14,779.9 | | 14,779.9 |
| 5 | April 2018 | 14,415.25 | | 14,415.25 |
| 6 | May 2018 | 11,996.95 | | 11,996.95 |
| 7 | June 2018 | 13,948.68 | | 13,948.68 |
| 8 | July 2018 | 15,485.49 | | 15,485.49 |
| 9 | August 2018 | 22,282.97 | | 22,282.97 |
| 10 | September 2018 | 26,317.72 | | 26,317.72 |
| 11 | October 2018 | 26,424.19 | | 26,424.19 |
| | Total | 203,203.30 | | 203,203.30 |

| B. Monthly Records of Certified CPO & PK since the last audit (December 17 – October 18) | | | |
|---|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| 1 | Dec -17 | 6,016.53 | 1,375.25 |
| 2 | Jan -18 | 4,354.07 | 1,037.37 |
| 3 | Feb -18 | 3,431.08 | 748.99 |
| 4 | Mar -18 | 3,443.00 | 742.96 |
| 5 | Apr -18 | 3,357.75 | 687.34 |
| 6 | May -18 | 3,270.17 | 643.39 |
| 7 | Jun -18 | 3,203.89 | 580.1 |
| 8 | Jul -18 | 3,570.79 | 650.24 |
| 9 | Aug -18 | 5,284.60 | 1,060.11 |
| 10 | Sep -18 | 6,197.31 | 1,358.71 |
| 11 | Oct -18 | 6,219.29 | 1,344.25 |
| | Total | 48,348.48 | 10,228.71 |

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| C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) <i>(December 17 – October 18)</i> | | | | | |
|---|-------------------|-----------------------------------|---|--------------------------------|-------------------------------|
| No. | Month-Year | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (mt) | Certified PK Sold (mt) |
| 1 | 23/10/2017 | IOI Commodity Trading Sdn Bhd | TR-7c926720-ebc5 | 1,000 | - |
| 2 | 7/12/2017 | IOI Commodity Trading Sdn Bhd | TR-33043ec9-ce03 | 971.98 | - |
| 3 | 10/1/2018 | IOI Commodity Trading Sdn Bhd | TR-a7d3f9ca-2f85 | 1,582.72 | - |
| 4 | 10/1/2018 | IOI Commodity Trading Sdn Bhd | TR-7a380574-a234 | 2,301.07 | - |
| 5 | 10/1/2018 | IOI Commodity Trading Sdn Bhd | TR-93a7a8e8-2643 | 3,000.08 | - |
| 6 | 10/1/2018 | IOI Commodity Trading Sdn Bhd | TR-9982a622-b153 | 37 | - |
| 7 | 10/1/2018 | IOI Commodity Trading Sdn Bhd | TR-a8e82f05-de56 | 3,443.57 | - |
| 8 | 10/1/2018 | IOI Commodity Trading Sdn Bhd | TR-98c5cdf1-c601 | 79 | - |
| 9 | 24/1/2018 | IOI Commodity Trading Sdn Bhd | TR-02eb0bcb-6ad9 | 1,000 | - |
| 10 | 13/2/2018 | Southern Acids Industries Sdn Bhd | TR-a55fed2a-b6cc | 40.38 | - |
| 11 | 14/2/2018 | IOI Commodity Trading Sdn Bhd | TR-a2c4c243-e838 | 736.74 | - |
| 12 | 22/2/2018 | IOI Commodity Trading Sdn Bhd | TR-6be86a82-3fc8 | 1,002.39 | - |
| 13 | 27/2/2018 | IOI Commodity Trading Sdn Bhd | TR-7327a6fa-5394 | 201.42 | - |
| 14 | 8/3/2018 | IOI Commodity Trading Sdn Bhd | TR-219c3974-d3d3 | 104.5 | - |
| 15 | 8/3/2018 | IOI Commodity Trading Sdn Bhd | TR-981ddd47-16e3 | 104.5 | - |
| 16 | 14/3/2018 | IOI Commodity Trading Sdn Bhd | TR-90519ab1-3155 | 1,001.29 | - |
| 17 | 6/4/2018 | IOI Commodity Trading Sdn Bhd | TR-d75bf2ef-38d5 | 2,898.72 | - |
| 18 | 17/4/2018 | IOI Commodity Trading Sdn Bhd | TR-6f32a182-604e | 1,001.38 | - |

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| | | | | | |
|----|------------|-------------------------------|------------------|----------|-----|
| 19 | 21/5/2018 | IOI Commodity Trading Sdn Bhd | TR-7a1c2f0b-ea79 | 1,001.15 | - |
| 20 | 16/6/2018 | IOI Commodity Trading Sdn Bhd | TR-0674243c-6f82 | 250 | - |
| 21 | 16/6/2018 | IOI Commodity Trading Sdn Bhd | TR-02c9d354-3ae4 | 250 | - |
| 22 | 16/6/2018 | IOI Commodity Trading Sdn Bhd | TR-8644ab80-b444 | 800.59 | - |
| 23 | 16/6/2018 | IOI Commodity Trading Sdn Bhd | TR-f2e2ad97-5842 | 1,640.71 | - |
| 24 | 16/6/2018 | IOI Commodity Trading Sdn Bhd | TR-413da0f3-b0aa | 420.96 | - |
| 25 | 21/6/2018 | IOI Commodity Trading Sdn Bhd | TR-d6c4f0ae-b737 | 1,742.90 | - |
| 26 | 21/6/2018 | IOI Commodity Trading Sdn Bhd | TR-2c70ae36-509d | 976.88 | - |
| 27 | 6/7/2018 | IOI Commodity Trading Sdn Bhd | TR-41588479-ba19 | 602.12 | - |
| 28 | 25/7/2018 | IOI Commodity Trading Sdn Bhd | TR-273fc92a-1b01 | 2,736.87 | - |
| 29 | 3/8/2018 | IOI Commodity Trading Sdn Bhd | TR-b98e3e9b-3b47 | 850.43 | - |
| 30 | 6/8/2018 | IOI Commodity Trading Sdn Bhd | TR-47c9521a-183a | 1,668.81 | - |
| 31 | 9/8/2018 | IOI Commodity Trading Sdn Bhd | TR-42ece445-5901 | 1,901.19 | - |
| 32 | 3/9/2018 | IOI Commodity Trading Sdn Bhd | TR-a3f1616c-d845 | 1,000 | - |
| 33 | 28/9/2018 | IOI Commodity Trading Sdn Bhd | TR-45338ed1-2b5e | 800.42 | - |
| 34 | 8/11/2017 | IOI Commodity Trading Sdn Bhd | TR-b0181094-97fa | - | 372 |
| 35 | 4/12/2017 | IOI Commodity Trading Sdn Bhd | TR-65391f6e-7e36 | - | 350 |
| 36 | 17/12/2017 | IOI Commodity Trading Sdn Bhd | TR-9410b319-8530 | - | 200 |
| 37 | 10/1/2018 | IOI Commodity Trading Sdn Bhd | TR-497fb979-b99d | - | 100 |
| 38 | 13/1/2018 | IOI Commodity Trading Sdn Bhd | TR-ffb0c499-112f | - | 100 |

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| | | | | | |
|----|-----------|-------------------------------|-------------------|-----------|----------|
| 39 | 16/1/2018 | IOI Commodity Trading Sdn Bhd | TR-e42ee049-e066 | - | 300 |
| 40 | 18/1/2018 | IOI Commodity Trading Sdn Bhd | TR-26a5ee9f-bdbd | - | 100 |
| 41 | 6/2/2018 | IOI Commodity Trading Sdn Bhd | TR-5a74e6b4-16e4 | - | 100 |
| 42 | 6/2/2018 | IOI Commodity Trading Sdn Bhd | TR-13664db4-5b1c | - | 300 |
| 43 | 5/3/2018 | IOI Commodity Trading Sdn Bhd | TR-3992c796-bf0d | - | 300 |
| 44 | 12/3/2018 | IOI Commodity Trading Sdn Bhd | TR-693a6d89-3020 | - | 100 |
| 45 | 7/4/2018 | IOI Commodity Trading Sdn Bhd | TR-f76526f5-66b3 | - | 400 |
| 46 | 15/5/2018 | IOI Commodity Trading Sdn Bhd | TR-638dfe8f-ee2d | - | 400 |
| 47 | 18/5/2018 | IOI Commodity Trading Sdn Bhd | TR-ab7d288f-94c3 | - | 100 |
| 48 | 16/6/2018 | IOI Commodity Trading Sdn Bhd | TR-c8c45a85-04c8 | - | 300 |
| 49 | 28/6/2018 | IOI Commodity Trading Sdn Bhd | TR-1f22f1e6-af73 | - | 100 |
| 50 | 4/7/2018 | IOI Commodity Trading Sdn Bhd | TR-35f6220c-1f56 | - | 500 |
| 51 | 11/7/2018 | IOI Commodity Trading Sdn Bhd | TR-198fd9d3-ef86 | - | 120 |
| 52 | 14/8/2018 | IOI Commodity Trading Sdn Bhd | TR-135f3fc6-cac2 | - | 600 |
| 53 | 5/9/2018 | IOI Commodity Trading Sdn Bhd | TR-cc042c79-1503 | - | 400 |
| 54 | 5/9/2018 | IOI Commodity Trading Sdn Bhd | TR-1eccdad3d-67c1 | - | 196.74 |
| 55 | 6/9/2018 | IOI Commodity Trading Sdn Bhd | TR-d30cfbcf-8abe | - | 487 |
| | | Total | | 37,149.77 | 5,925.74 |

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| D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) (December 17 – October 18) | | | | | |
|--|------------|-------------|-------------|---------------|--------------|
| No. | Month-Year | Buyers Name | Scheme Name | CPO Sold (mt) | PK Sold (mt) |
| | | N/A | | | |

| E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (December 17 – October 18) | | | | | |
|---|-------------|--------------|---------------|--------------|--|
| No. | Month- Year | Buyers Name | CPO Sold (mt) | PK Sold (mt) | |
| 1 | Dec -2017 | FJB (IGS) | 1,921.01 | - | |
| 2 | Jan -2018 | FJB (IGS) | 359.20 | - | |
| 3 | Feb -2018 | FJB (IGS) | 388.54 | - | |
| 4 | Mar -2018 | FJB (IGS) | 1,319.99 | - | |
| 5 | May -2018 | FJB (IGS) | 454.38 | - | |
| 6 | June -2018 | FJB (IGS) | 446.92 | - | |
| 7 | Oct -2018 | FJB (IGS) | 772.31 | - | |
| 8 | Dec -2017 | HUP LEE | - | 196.40 | |
| 9 | Dec -2017 | HOK HUAT | - | 347.47 | |
| 10 | Jan -2018 | HUP LEE | - | 203.60 | |
| 11 | Jan -2018 | JIN LEE | - | 319.06 | |
| 12 | Jan -2018 | HOK HUAT | - | 144.56 | |
| 13 | Jan -2018 | ACE EDIBLE | - | 87.76 | |
| 14 | Jan -2018 | SIN HUAT HIN | - | 77.48 | |
| 15 | Feb -2018 | HUP LEE | - | 117.74 | |
| 16 | Feb -2018 | HOK HUAT | - | 153.85 | |
| 17 | Mar -2018 | HUP LEE | - | 271.50 | |
| 18 | Mar -2018 | HOK HUAT | - | 119.13 | |
| 19 | Mar -2018 | ACE EDIBLE | - | 85.54 | |
| 20 | Apr -2018 | HUP LEE | - | 10.76 | |
| 21 | Apr -2018 | HOK HUAT | - | 286.93 | |
| 22 | Apr -2018 | SEHCOM | - | 79.35 | |
| 23 | Apr -2018 | SIN HUAT HIN | - | 39.23 | |
| 24 | May -2018 | ACE EDIBLE | - | 126.70 | |
| 25 | June -2018 | HOK HUAT | - | 121.38 | |
| 26 | July -2018 | JIN LEE | - | 39.98 | |
| 27 | July -2018 | HOK HUAT | - | 77.73 | |

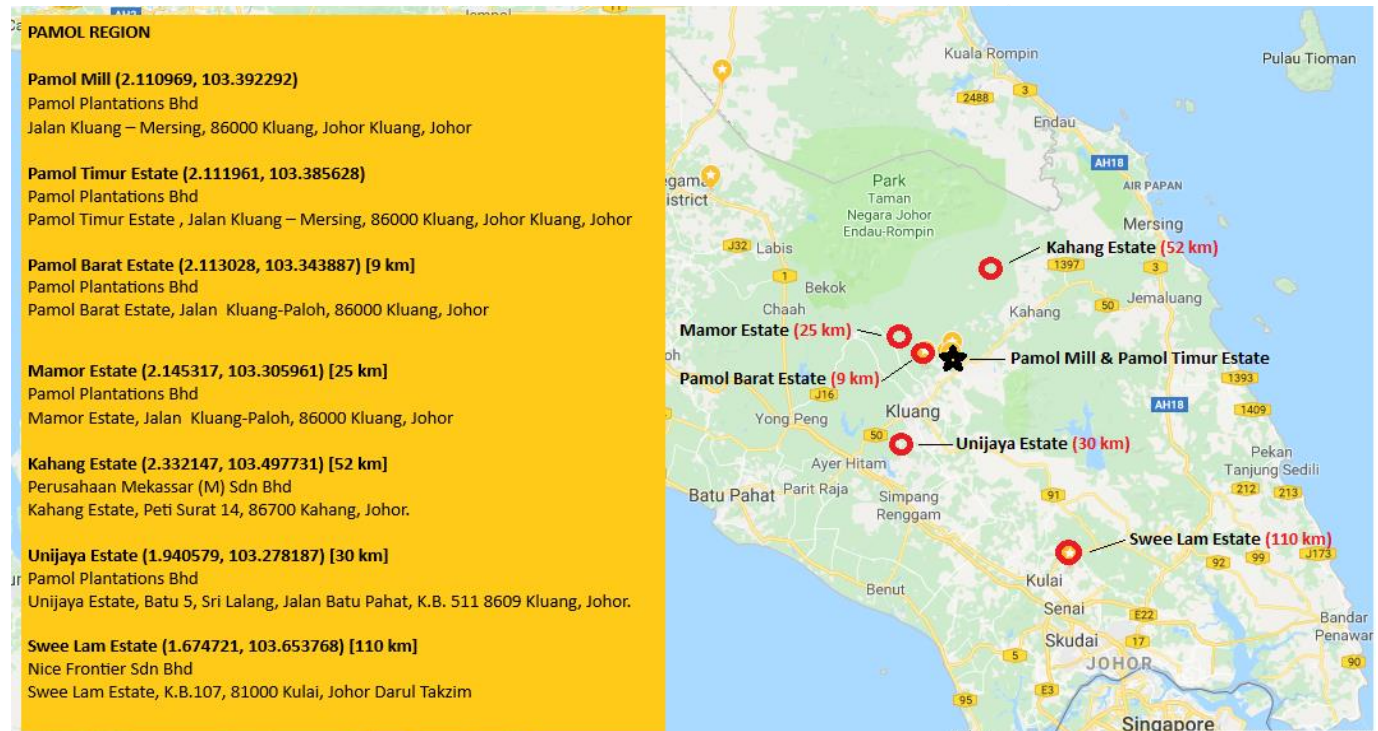
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| | | | | |
|----|------------|--------------|----------|----------|
| 28 | July -2018 | SEHCOM | - | 35.65 |
| 29 | July -2018 | SIN HUAT HIN | - | 119.75 |
| 30 | Aug -2018 | HOK HUAT | - | 90.67 |
| 31 | Aug -2018 | SIN HUAT HIN | - | 42.25 |
| 32 | Sept -2018 | HOK HUAT | - | 12.63 |
| 33 | Sept -2018 | SIN HUAT HIN | - | 42.35 |
| | | Total | 5,662.35 | 3,249.45 |

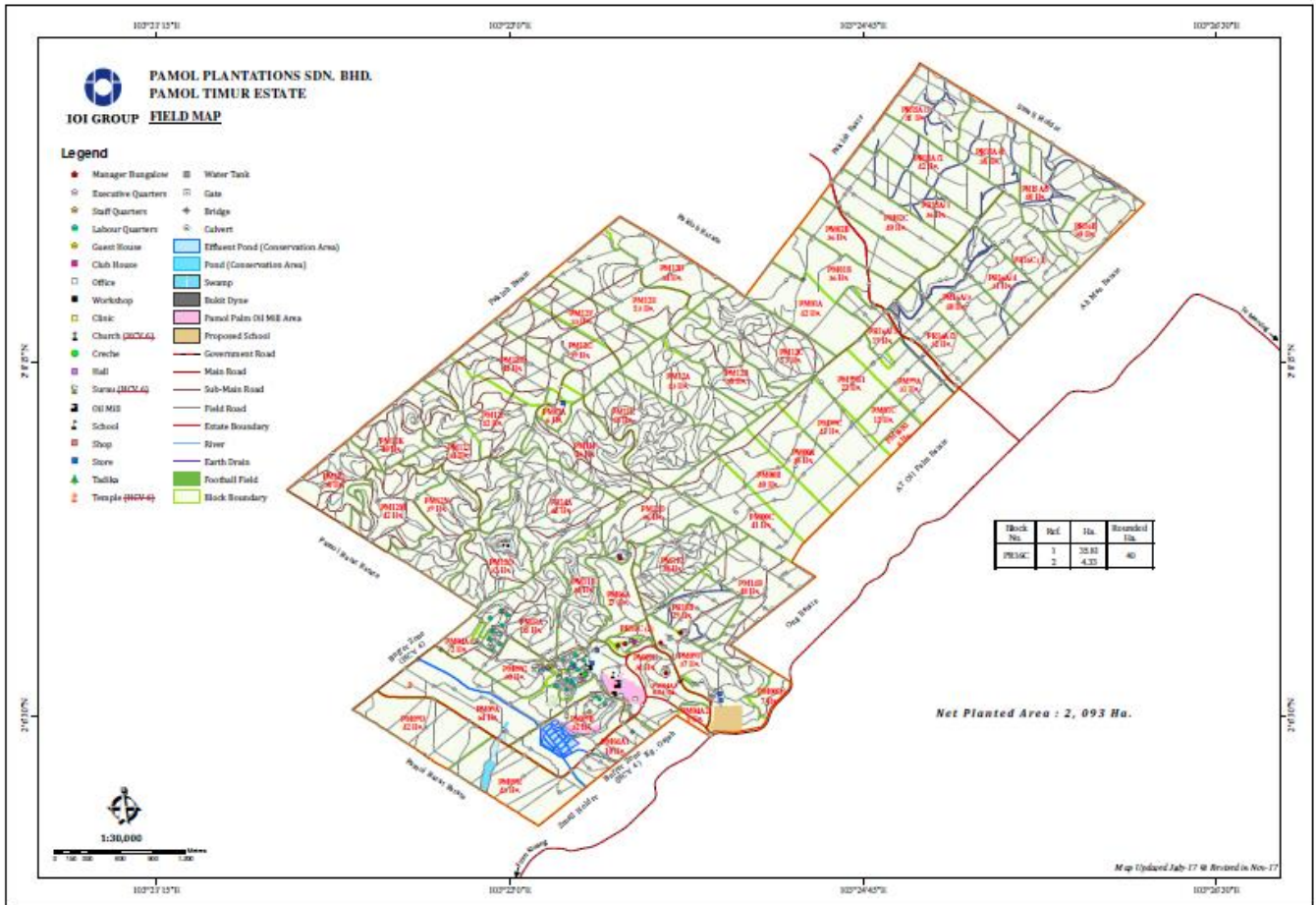
| F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) <i>(December 17 – October 18)</i> | | | | |
|---|--------------------|--------------------|---|--|
| No. | Month- Year | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold (mt) |
| 1 | N/A | | | |



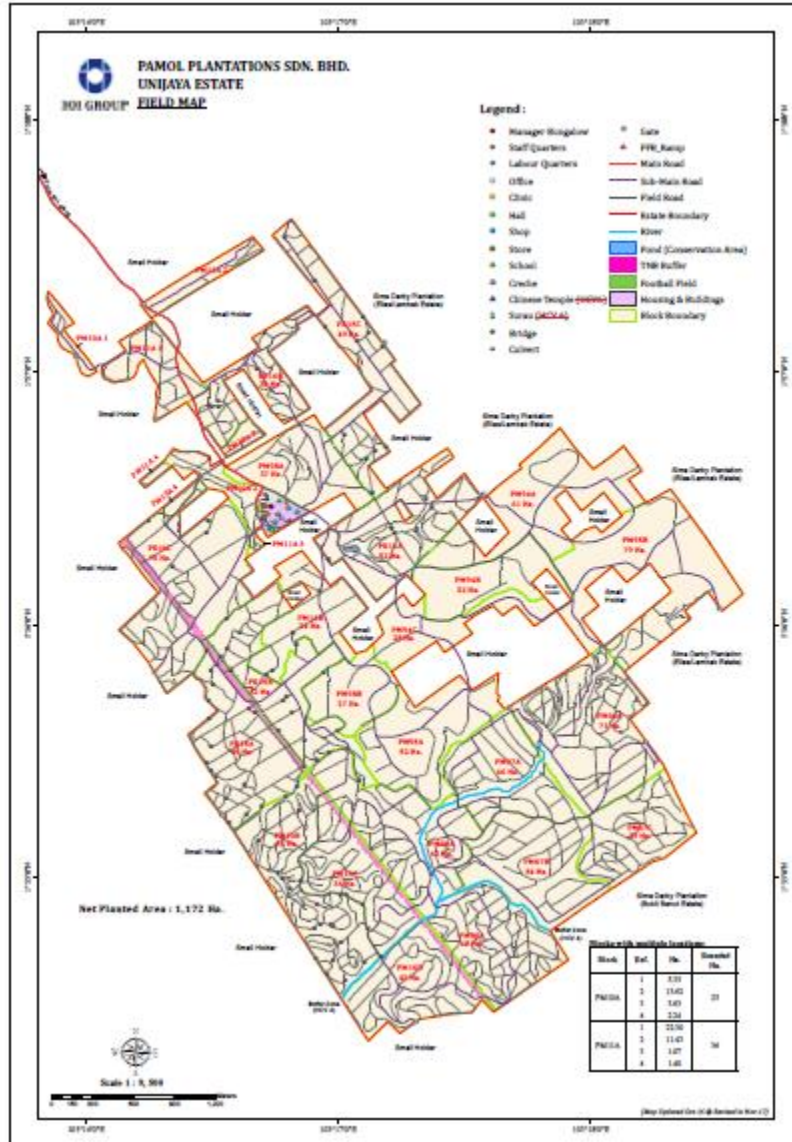
Appendix F: Location Map of Pamol Kluang Palm Oil Mill Certification Unit and Supply bases



Appendix G: Pamol Timur Estate



Appendix J: Unijaya Estate



Appendix M: List of Smallholder Sampled *(If applicable – scheme/associated/group certification)*

Not applicable

DRAFT

Appendix N: List of Abbreviations

| | |
|------------|--|
| a.i | Active Ingredient |
| BOD | Biochemical Oxygen Demand |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm Oil |
| CSPO | Certified Sustainable Palm Oil |
| CSPKO | Certified Sustainable Palm Kernel 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 |
| IP | Identity Preserved |
| IS - CSPO | Independent Smallholder Certified Sustainable Palm Oil |
| IS – CSPKO | Independent Smallholder Certified Sustainable Palm Kernel Oil |
| IS – CSPKE | Independent Smallholder Certified Sustainable Palm Kernel Expeller |
| ISCC | International Sustainable Carbon Certification |
| LD50 | Lethal Dose for 50 sample |
| MB | Mass Balance |
| MSDS | Material Safety Data Sheet |
| MT | Metric Tonnes |
| OER | Oil Extraction Rate |
| OSH | Occupational Safety and Health |
| PK | Palm Kernel |
| PKO | Palm Kernel Oil |
| PKPOM | Pamol Kluang Palm Oil Mill |
| POM | Palm Oil Mill |
| POME | Palm Oil Mill Effluent |
| PPE | Personal Protective Equipment |
| PTE | Pamol Timur Estate |
| RSPO | Roundtable on Sustainable Palm Oil |
| P&C | Principles & Criteria |
| RTE | Rare, Threatened or Endangered species |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |
| UJE | Unijaya Estate |