

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2\_1)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

<b>Client Company name (Parent Company):</b> <b>IOI Corporation Berhad</b>
Client company Address: IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia
Certification Unit: <b>IOI Pamol Kluang Palm Oil Mill</b> and supply bases
Location of Certification Unit: 8 1/2 Miles, Jalan Mersing Road 86007 Kluang, Johor Darul Takzim, Malaysia.
Date of Final Report: 14/4/2021

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**Section 1: Scope of the Certification Assessment**

1. Company Details			
<b>Parent Company</b>	IOI Corporation Berhad		
<b>RSPO Membership Number</b>	2-0002-04-000-00	<b>Membership Approval Date</b>	17/05/2004
<b>Address</b>	Headquarters IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	IOI Pamol Kluang POM and supply bases		
<b>Location / Address</b>	8 1/2 Miles, Jalan Mersing Road , 86007 Kluang, Johor, Malaysia.		
<b>Website</b>	<a href="http://www.ioigroup.com">www.ioigroup.com</a>		
<b>Management Representative</b>	Chai Tian Siang	<b>E-mail</b>	<a href="mailto:pmm@ioigroup.com">pmm@ioigroup.com</a>
<b>Telephone</b>	+603-89478888 +607-787 5100	<b>Facsimile</b>	+607-7875179

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 547027</b>	<b>Date of First Certification</b>	16/03/2010
		<b>Certificate Start Date</b>	16/03/2020
		<b>Certificate Expiry Date</b>	15/03/2025
<b>Scope of Certification</b>	Production of Crude Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	The objective of the assessment was to conduct an annual surveillance assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 1) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards</b>	<input checked="" type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 700802	Part 3 of MS 2530 – Plantations and organized smallholders	BSI Services Malaysia Sdn Bhd	31/12/2023
MSPO 700801	Part 4 of MS2530- Palm Oil Mill	BSI Services Malaysia Sdn Bhd	31/12/2023
MSPO 720913	MSPO Supply Chain Certification: 2018	BSI Services Malaysia Sdn Bhd	24/12/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Pamol Kluang Palm Oil Mill	Pamol Kluang Oil Mill, 8 1/2 Miles, Jalan Mersing Road , 86007 Kluang, Johor	2°06'39.49" N	103°23'32.25" E
Pamol Timur Estate	Pamol Timur Estate , Jalan Kluang – Mersing, 86000 Kluang, Johor Kluang, Johor	2°06'43.1" N	103°23'08.3" E
Pamol Barat Estate	Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	2°06'46.9" N	103°20'38.0" E
Mamor Estate	Mamor Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	2°08'43.1" N	103°18'21.5" E
Unijaya Estate	Unijaya Estate, Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 8609 Kluang, Johor.	1°56'26.1" N	103°16'41.5" E
Kahang Estate	Kahang Estate, Peti Surat 14, 86700 Kahang, Johor.	2°19'55.73" N	103°29'51.83" E
Swee Lam Estate	Swee Lam Estate, K.B.107, 81000 Kulai, Johor	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*	2094	6.78	195.33	2296.11	91.20
Pamol Barat Estate*	2124	7.19	179.13	2310.32	91.94
Mamor Estate	2074	46.04	105.44	2225.48	93.19
Unijaya Estate	1166	1.97	92.53	1260.50	92.49

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Kahang Estate	2278	4.11	137.79	2419.90	94.14
Swee Lam Estate	1098	2.16	60.8	1160.96	94.58
<b>Total</b>	<b>10834</b>	<b>68.25</b>	<b>771.02</b>	<b>11673.27</b>	

**Note:**  
 \*Total planted area for Pamol Timur Estate and Pamol Barat Estate  
 Increase 1 ha of planted area due to resurvey for replanting area, acquisition by Telekom Malaysia and realignment of riparian reserve and boundary of housing and pam oil mill.  
 \*\*There are some changes of HCV areas from previous year in the estates due to the re-demarcation program by GIS.

**6. Plantings & Cycle**

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pamol Timur Estate	0	1369	625	100	0	2094	0
Pamol Barat Estate	772	1148	204	0	0	1352	772
Mamor Estate	0	4	1334	736	0	2074	0
Unijaya Estate	252	534	316	64	0	914	252
Kahang Estate	0	0	2278	0	0	2278	0
Swee Lam Estate	0	497	432	0	169	1098	0
Total (ha)	1024	3552	5188	900	169	9809	1024

**7. Certified Tonnage of FFB (Own Certified Scope)**

Estate	Tonnage / year			
	Estimated (March 2020-Feb 2021)	Actual (Nov 2019-Oct 2020)		Forecast (March 2021-Feb 2022)
		Previous license period (Nov 2019-Feb 2020)	Current license period (Mar 2020-Oct 2020)	
Pamol Timur Estate	45393.00	12720.80	19628.79	48174
Pamol Barat Estate	27309.70	7333.06	12452.11	39678
Mamor Estate	61964.00	15836.18	20720.45	51893
Unijaya Estate	25742.00	7275.19	10552.26	24070
Kahang Estate	63637.00	18934.64	30143.35	63976
Swee Lam Estate	27950.00	9291.19	10142.47	27920
Total	251995.70	175030.49		255711

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8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (March 2020-Feb 2021)	Actual (Nov 2019-Oct 2020)		Forecast (March 2021-Feb 2022)
	N/A	<i>Previous license period</i> (Nov 2019-Feb 2020)	<i>Current license period</i> (Mar 2020-Oct 2020)	N/A
		N/A	N/A	
<b>Total</b>				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (March 2020-Feb 2021)	Actual (Nov 2019-Oct 2020)		Forecast (March 2021-Feb 2022)
		<i>Previous license period</i> (Nov 2019-Feb 2020)	<i>Current license period</i> (Mar 2020-Oct 2020)	
	N/A	N/A	N/A	N/A
<b>Total</b>				

10. Certified Tonnage				
Mill Capacity: 60 MT/hr	Estimated (March 2020-Feb 2021)	Actual (Nov 2019-Oct 2020)		Forecast (March 2021-Feb 2022)
	FFB	FFB		FFB
	251995.70	<i>Previous license period</i> (Nov 2019-Feb 2020)	<i>Current license period</i> (Mar 2020-Oct 2020)	255711
		71391.06	103639.43	
	<b>CPO (OER: 23.5%)</b>	<b>CPO (OER: 23.9%)</b>	<b>CPO (OER: 23.40%)</b>	<b>CPO (OER: 23.50%)</b>
	59219	17062.46	24251.63	60092.09
	<b>PK (KER:4.75 %)</b>	<b>PK (KER: 4.78%)</b>	<b>PK (KER: 4.58%)</b>	<b>PK (KER: 4.75%)</b>

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	11969.80	3412.49	4746.69	12146.27
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<b>11. Actual Sold Volume (CPO)</b>					
<b>Current License period (Mar 2020-Oct 2020)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	24,231.08	-	-	-	24,231.08
<b>Previous License period (Nov 2019-Feb 2020)</b>					
CPO (MT)	16,998.95	-	-	48.65	17,047.60
Total	41,230.03			48.65	41,278.68

<b>12. Actual Sold Volume (PK)</b>					
<b>Current License period (Apr 2020-Oct 2020)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	4,578.96	-		-	4,578.96
<b>Previous License period (Nov 2019-March 2020)</b>					
PK (MT)	3,442.02	-		-	3,442.02
Total	8,020.98				8,020.98

<b>13. Independent Smallholders Certification Claims</b>		
	Credit	Physical Volume (MT)
IS-CSPO	N/A	
IS-CSPKO	N/A	
IS-CSPKE	N/A	



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 84,000 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.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **24 – 26/11/2020**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on **11/01/2021**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil (MYNI 2019) was used to guide the assessment 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 (and 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
- 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 I.

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

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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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Re- certification2)</b>	<b>Year 2 (ASA2_1)</b>	<b>Year 3 (ASA2_2)</b>	<b>Year 4 (ASA2_3)</b>	<b>Year 5 (ASA2_4)</b>
Pamol Kluang POM	√	√	√	√	√
Pamol Timur Estate		√			√
Pamol Barat Estate	√			√	
Mamor Estate			√		
Unijaya Estate		√			√
Kahang Estate			√		
Swee Lam Estate	√			√	

**Tentative Date of Next Visit: November 9, 2020 - November 12, 2020**

**Total No. of Mandays:** 12 Mandays.

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**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Muhammad Fadzli Masran	Lead Auditor	He holds Bachelor Degree in Forestry Science, graduated from 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. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements. He is fluent in Bahasa Malaysia and English languages.
Hu Ning Shing	Team Member	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 Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements. She is fluent in Bahasa Malaysia and English languages.
Mahzan Munap	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 milling and 8 days for oil palm plantation). CIMA 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 covered Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment and management plan. He is fluent in Bahasa Malaysia and English languages.

**Accompanying Persons:** N/A

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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	MFM	MM	HNS
Monday 23/11/2020	PM	Audit Team Travelling	√	√	√
Tuesday 24/11/2020	08.30 – 9.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	√
Pamol Timur Estate	09.00 – 12.30	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.	√	√	√
	9.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Document review P1 – P7: (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.)	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Wednesday 25/11/2020	08.30 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
Pamol Kluang Palm Oil Mill	09.00 – 13.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	√
	12.30 – 13.30	Lunch	√	√	√

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	13.30 – 16.30	Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.  RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Thursday 26/11/2020  Unijaya Estate	09.00 – 12.30	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.	√	√	√
	9.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Document review P1 – P7: (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.)	√	√	√
	16.30 – 17.00	Preparation of audit report	√	√	√
	17.00 – 17.30	Closing Meeting	√	√	√
	PM	Audit Team Travelling to Kuala Lumpur	√	√	√

Major NC Close out visit

Date	Time	Subjects	MFM
Tuesday 11/01/2021	AM	Auditor Travelling	√
IOI Pamol POM and Supply Base	09.00 – 09.30	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√

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09.30 – 12.00	<ul style="list-style-type: none"> <li>• Verification on previous Major NC:               <ol style="list-style-type: none"> <li>1. 1992177-202011-M1</li> <li>2. 1992177-202011-M2</li> <li>3. 1992177-202011-M3</li> </ol> </li> <li>• Site observation ,workers interview (individual and group session) if necessary</li> <li>• Document review – implemented evidence</li> </ul>	√
12.00 – 13.00	Closing Meeting	√
13.00	Audit Team travel back to Kuala Lumpur	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- IOI Corporation Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- (Malaysia) National Interpretation (2019) for RSPO P&C 2018
- Independent Smallholder Standard 2019

#### 3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. Please refer to IOI Time Bound Plan updated as of 31 October 2020	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Please refer to IOI Time Bound Plan updated as of 31 October 2020 and IOI ACOP 2019 under Time Bound Plan section (page 8/12) which was submitted to RSPO.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No changes. The management units in Indonesia is awaiting for HGU. The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI. Due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. The postponement of the main assessment have been communicated and approved by RSPO.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No isolated lapses. The management units in Indonesia is awaiting for HGU. The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI. Due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. The postponement of the main assessment have been communicated and approved by RSPO.	Complied

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<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No fundamental failure. The management units in Indonesia is awaiting for HGU. The Stage 1 of RSPO P&amp;C audit was conducted on 9th – 12th September 2019 by BSI.</p> <p>Due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. The postponement of the main assessment have been communicated and approved by RSPO.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p>No. Complaint was raised against PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS), PT Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad). However the complaint has been resolved.</p>	<p>Complied</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>The concession in Indonesia PT. KPAM had undergo the NPP process prior to any new planting. Please refer to the latest Time Bound Plan updated as of 31 October 2020.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p>	<p>Settlement on the dispute over land ownership in Tinjar Long Lapok is still in progress through the engagement programme headed by the IOI stakeholder team. Please refer to the latest Time Bound Plan updated as of 31 October 2020.</p> <p>Reviewed and verified with RSPO RaCP tracker, A LUC analysis for PT Berkat Sawit Sejati was conducted during the staged implementation of RaCP. No compensation liability was found. This has been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.</p>	<p>Complied</p>



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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute reported in the uncertified units.	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported in the uncertified units.	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. As part of the RSPO P&C compliance, internal audit has been conducted at the uncertified units. Report of improvement was provided for site's further improvement.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholders including NGO were consulted in the uncertified units.	Complied

**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? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there is no smallholder scheme under IOI Pamol Kluang and supply bases certification unit	Not applicable

### 3.4 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were three (3) Critical; one (1) Minor nonconformities and no Opportunity For Improvement raised. The IOI Pamol Klauang and supply bases 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 Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	1992177-202011-M1	<b>Clause &amp; Category (Critical / Minor)</b>	5.1.6 (Critical)
<b>Date Issued</b>	26/11/2020	<b>Due Date</b>	24/02/2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	11/01/2021
<b>Statement of Nonconformity:</b>	There is no time frame for payment is stated in the contract document.		
<b>Requirement Reference:</b>	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -		
<b>Objective Evidence:</b>	Invoice No IV-2008-0004 dated 21 August 2020 for the sum of RM116, 822.52 contains a 30-day term of payment. However, this amount remains unpaid as of the date of audit.		
<b>Corrections:</b>	The estate has highlighted this issue to Top Management and they are expediting the payment process. The pending payment is expected to be made by 08/01/2021.		
<b>Root Cause Analysis:</b>	Contracts issued by certification unit to contractors (which is different from the contracts issued by HQ) include a time frame for payment However, IOI HQ uses a separate contract which does not include a time frame for payment as mentioned in the NCR.		
<b>Corrective Actions:</b>	To avoid payment delay in future: a) HQ shall negotiate for a longer time frame for payment and include these terms in contracts especially for large projects; b) O.Cs shall try to estimate the correct amount when budgeting for all future contracts c) O.Cs shall immediately arrange for the difference if the tender award amount is above the estate's budgeted amount; d) O.Cs shall request Additional Vote for the non-budgeted amount and ensure that the payment is made within the agreed time frame		
<b>Assessment Conclusion:</b>	Major NC verification visit:		

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	<p>Correction:</p> <p>Payment have been made to the respective contractors as per online transaction details dated 06/01/2021, ref. no. MYIT210106287580 and 08/01/2021, ref. no. MYIT210108728499.</p> <p>Corrective action:</p> <p>The company has established addendum for the contracts signed by the contractors dated 09/01/2021. The amendment has been made to clause 13 of the original contract. The new payment term is within 60 days from the date of receipt of the claim together with any previous interim payment of the value of work from contractors.</p> <p>The company has established Flowchart for Process flow for replanting CER (Capital Expenditure Requisition) payment.</p> <p>The evidence verified and adequate. The Major NC was effectively closed on 11/01/2021</p>
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Non-conformity									
<b>NCR Ref #</b>	1992177-202011-M2	<b>Clause &amp; Category (Critical / Minor)</b>	6.2.3 (Critical)						
<b>Date Issued</b>	26/11/2020	<b>Due Date</b>	24/02/2021						
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	11/01/2021						
<b>Statement of Nonconformity:</b>	The management did not comply with the Employment Act 1955 where the limit of overtime for the worker has exceeded 104 hours.								
<b>Requirement Reference:</b>	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance -								
<b>Objective Evidence:</b>	<p>Unijaya Estate:</p> <p>Sampled one of the workers' payslips and overtime records (Employee No: 1PPP/IOI/1115/764 - harvesting mandore) for June 2020 and October 2020 found that his overtime hours have exceeded the maximum limit of 104 hours without the approval from authority.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Month</td> <td style="width: 70%;">Hours of overtime</td> </tr> <tr> <td>June 2020</td> <td>112.5</td> </tr> <tr> <td>October 2020</td> <td>109</td> </tr> </table>			Month	Hours of overtime	June 2020	112.5	October 2020	109
Month	Hours of overtime								
June 2020	112.5								
October 2020	109								
<b>Corrections:</b>	As the supervisor failed to monitor the overtime hours of the harvesting mandore, the management issued a letter to the supervisor to remind him to monitor the working and overtime hours of all his workers.								
<b>Root Cause Analysis:</b>	The management of Unijaya estate failed to monitor the limit of overtime as per the Employment Act as they did not have a monitoring system to help them to check and ensure that the overtime hours do not exceed 104 hours. The payroll								

	clerk who was previously checking and monitoring OT hours was transferred to the SAP regional office.
<b>Corrective Actions:</b>	The management has instructed the payroll clerk to key in details of overtime hours in the SAP system every next day. The payroll clerk is to alert management if any worker has reached 90 overtime hours in a month. Supervisors are reminded to monitor and ensure that any extra work be offered to other workers so that no worker exceeds 104 overtime hours in a month.
<b>Assessment Conclusion:</b>	<p>Major NC verification visit:</p> <p>Correction</p> <p>The estate management has issue warning letter to the respective field supervisor on the poor monitoring of the harvesting mandore overtime records as per letter dated 01/12/2020</p> <p>Corrective action</p> <p>The estate management has issued memorandum to all supervisor on Daily Monitoring of workers overtime as per internal memorandum dated 04/12/2020. In the memo stated as follows:</p> <p>“The payroll clerk is to alert management if any worker has reached 90 overtime hours in a month. Supervisors are reminded to monitor and ensure that any extra work be offered to other workers so that no worker exceeds 104 overtime hours in a month.”</p> <p>Noted during interview with the respective mandore, they have been brief on the maximum overtime of 104 as per Employment Act 1955.</p> <p>The evidence verified and adequate. The Major NC was effectively closed on 11/01/2021</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1992177-202011-M3	<b>Clause &amp; Category (Critical / Minor)</b>	6.2.4 (Critical)
<b>Date Issued</b>	26/11/2020	<b>Due Date</b>	24/02/2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	11/01/2021
<b>Statement of Nonconformity:</b>	The linesite inspection was not carried out effectively.		
<b>Requirement Reference:</b>	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>		

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<p><b>Objective Evidence:</b></p>	<p>Hospital Assistant of Pamol Kluang POM has conducted linesite inspection on weekly basis and the last round of inspection was conducted on 21/11/2020 using the Monitoring Checklist – Linesite. As seen in the checklist found that all the condition of the housing area was satisfied and in good condition such as good flow of water and clean compound. However, during site visit to the linesite found the following issues:</p> <p>a) The houses are not kept in a good state of repair. Houses had missing window panes and rotting doors.</p> <p>b) The area surrounding the workers’ housing are not maintained in a clean and sanitary condition.</p> <p>c) The drains behind houses No. 18 and No. 10 contain food debris and undergrowth which does not permit the free flow of water.</p> <p>d) House No. 18 had an extension that was leaning unsafely to one side.</p> <p>This has shown that the inspection was not carried out effectively.</p>
<p><b>Corrections:</b></p>	<p>As it was found that the outgoing hospital assistant (HA) was not really doing proper linesite inspection, the mill decided to fast track the transition of HAs. The new HA has been requested to carry out a proper linesite inspection together with Pamol Kluang Mill social liaison officer on 05th December 2020. They are to present the findings to management to make a plan for to repair/ replacement/ cleaning.</p>
<p><b>Root Cause Analysis:</b></p>	<p>As the present linesite inspection form did not include columns for action taken, status and acknowledgement by management, problems at linesite was not adequately addressed.</p>
<p><b>Corrective Actions:</b></p>	<p>The linesite inspection form is revised to include columns for action taken, status and acknowledgement by management. This new form is distributed to all operating centers.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Major NC verification visit:</p> <p>Correction:</p> <p>Linesite inspection was conducted on weekly basis. Sighted the inspection records using the new updated form dated 02/12/2020, 09/12/2020, 16/12/2020, 23/12/2020 and 30/12/2020.</p> <p>Base on the linesite inspection records, the management has established Repair/Replacement/Cleaning schedule. In the schedule stated the inspection date, issue, action taken/plan, target date and status. Sighted the issue recorded for inspection conducted on 02/12/2020 addressed and completed on 05/12/2020 and inspection conducted on 09/12/2020 addressed and completed on 12/12/2020.</p> <p>Corrective action</p> <p>The mill management has revised and updated the Monitoring Checklist – Linesite, refer SOP: 4, Appendix 4, Rev. 2b with effective from 07/12/2020. In the new checklist stated Area Inspected, HA Inspection Note and Action taken by the Mill Management. Sighted the inspection records using the new updated form dated 02/12/2020, 09/12/2020, 16/12/2020, 23/12/2020 and 30/12/2020.</p> <p>The evidence verified and adequate. The Major NC was effectively closed on 11/01/2021</p>

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Non-conformity			
<b>NCR Ref #</b>	1992177-202011-N1	<b>Clause &amp; Category (Critical / Minor)</b>	2.1.2 (non-critical)
<b>Date Issued</b>	26/11/2020	<b>Due Date</b>	Next Assessment
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	Next Assessment
<b>Statement of Nonconformity:</b>	The monitoring of changes to the permit requirement was not effectively implemented.		
<b>Requirement Reference:</b>	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -		
<b>Objective Evidence:</b>	<p>Unijaya Estate</p> <p>The estate has acquired 'Permit "Kebenaran menggunakan Bekalan Air Persendirian" from labour Department as per permit no. TK(NJ).KG/43 dated 22/9/2019. In the permit stated that the estate shall obtain water quality analysis report at minimum of once per 3 months.</p> <p>However, the estate on conducted the domestic water quality analysis once a year for 2019 as per report reference no. ENV/WTR/UJE/175 in July 2019. For 2020, the domestic water quality analysis was conducted on 3/11/2020, however the report has yet to receive by the estate.</p> <p>The water quality analysis conducted was not follow the requirement as stated in the permit. These shows that the monitoring of changes to the permit requirement was not effectively implemented.</p> <p>Pamol Kluang POM</p> <p>The Atlas Copco Unfired Pressure Vessel (air compressor) has not been registered with DOSH while it has been used / operated in the biogas plant. This was against Factories Machinery Act 1967 regulation.</p>		
<b>Corrections:</b>	<p>Unijaya Estate</p> <p>Estate shall hire a new sustainability staff to assist the new Environment Liaison Officer in sustainability matters. This staff shall also assist in the monitoring and implementation of changes to the permit requirements especially the domestic water quality analysis.</p> <p>Pamol Kluang POM</p> <p>Pamol Kluang Mill has submitted documents to register The Atlas Copco Unfired Pressure Vessel (air compressor) with DOSH through myKPP system on 02/12/2020</p>		
<b>Root Cause Analysis:</b>	<p>Unijaya Estate</p> <p>Due to lack of experienced personnel and sustainability staff, the estate could not conduct more thorough checking and monitoring of legal requirements. This was amplified by the fact that the person in charge of monitoring the permit requirements left the estate in September 2020 without proper handover of</p>		

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	<p>duties to his successor. Unijaya estate also did not have a sustainability staff since October 2019. They have failed to hire a replacement due to lack of accommodation in the estate.</p> <p>Pamol Kluang POM</p> <p>The legal liaison officer who is responsible to monitor the legal compliance in mill did not register the Atlas Copco Unfired Pressure Vessel (air compressor) which was used/operated in the biogas plant with DOSH as the system was still in the commissioning stage and not handed over officially to the mill by the Contractor.</p> <p>The management also failed to request a copy of the Hydrostatic test (JKJ 127) form of the Unfired Pressure Vessel (JKJ 127) from the contractor though it was available</p>
<b>Corrective Actions:</b>	<p>Unijaya Estate</p> <p>The sustainability internal audit checklist and annual sustainability program shall be revised according to the conditions stated in the permits to ensure proper implementation.</p> <p>Pamol Kluang POM</p> <p>Legal liaison officer shall ensure that all personnel, equipment and machinery for carrying out work in the premises comply with legal requirements before commencing work inside the premises.</p> <p>They are to use the attached checklist to check and ensure that all machinery are valid.</p> <p>The additional requirements for contractors and service providers shall be revised to include conditions that all personnel, equipment and machinery that require competency certificates are available and valid.</p>
<b>Assessment Conclusion:</b>	<p>As this is minor NC, the effective implementation will be assess during next assessment.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	NA

Positive Findings	
PF #	Description
PF 1	Good continuous improvement program implementation generally for productivity and safety aspects

**3.4.1 Status of Nonconformities Previously Identified and Observations**

<b>Non-conformity</b>
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<b>NCR Ref #</b>	1852239-201911-M1	<b>Clause &amp; Category (Critical / Minor)</b>	2.1.1 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	28/02/2020
<b>Statement of Nonconformity:</b>	<p>A female worker at the Pamol Kluang Palm Oil Mill who works the night shift has not received:</p> <p>a. Shift allowance; and</p> <p>b. 11 hours continuous rest before she re-commenced her work.</p>		
<b>Requirement Reference:</b>	The unit of certification complies with applicable legal requirements.		
<b>Objective Evidence:</b>	<p>The Department of Labour has granted the Pamol Kluang Palm Oil Mill an exemption under Section 34 Employment Act 1955 allowing female employees to work between 10.00PM to 5.00AM. This exemption is subject to conditions stipulated in the Labour Department Peninsular Malaysia letter dated 15 March 2019, (Ref BHG PU/9/135 Jld 18(5)).</p> <p>The conditions states:</p> <ul style="list-style-type: none"> <li>- Paragraph 2 (iii): Receive 11 hours continuous rest before she re-commences work; and</li> <li>- Paragraph 2 (vi): Paid shift allowance in accordance with the collective agreement.</li> </ul> <p>Objective evidence shows that on the above dates, the working hours of Worker No. 2609 at Pamol Kluang Palm Oil Mill were as follows:</p> <p>Date OT working hours and time start work the next day Rest hours</p> <p>16 May 2019 4.00PM to 12.00AM 7.00AM 7 hours</p> <p>17 May 2019 4.00PM to 11.00PM 7.00AM 8 hours</p> <p>18 May 2019 4.00PM to 12.00AM 7.00AM 7 hours</p> <p>10 June 2019 4.00PM to 11.00PM 7.00AM 8 hours</p> <p>Worker 2609:</p> <ol style="list-style-type: none"> <li>1. Re-commenced work without having 11 hours continuous rest. This is not in compliance with the terms and conditions imposed by the Labour Department Peninsular Malaysia via paragraph 2 (iii) of the letter Ref BHG PU/9/135 Jld 18(5) dated 15 March 2019.</li> <li>2. Was not paid shift allowance. This is not in compliance with the terms and conditions imposed by the Labour Department Peninsular Malaysia via letter Ref BHG PU/9/135 Jld 18(5) dated 15 March 2019 (paragraph 2 (vi)) and Article 41 (a) of the IOI Group of Companies/AMESU Agreement 2018 of the MAPA Agreement states that an employee working the second shift is entitled to RM4.70</li> </ol>		
<b>Corrective Actions:</b>	<p>i) Not receiving 11 hours continuous rest</p> <p>Mill management is actively looking to recruit an additional employee for the weighbridge operations. With 3 employees, mill management will rotate them on shift basis to ensure that all employees get adequate rest as per JTK requirement.</p> <p>ii) Not receiving shift allowance</p>		



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	Mill management is paying shift allowance for all second shift/evening shift work effective immediately.
<b>Assessment Conclusion:</b>	No recurrence non-compliance. The major NC is effectively closed

<b>Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
<b>OFI 1</b>	NA

**3.4.2 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>Category (Critical / Minor)</b>	<b>P&amp;C Indicator</b>	<b>Issued Date</b>	<b>Status &amp; Date (Closure)</b>
1852239-201911-M1	Major	2.1.1	29/11/2019	Closed on 28/02/2020
1992177-202011-M1	Major	61.16	26/11/2020	Closed on 11/01/2021
1992177-202011-M1	Major	6.2.3	26/11/2020	Closed on 11/01/2021
1992177-202011-M1	Major	6.2.4	26/11/2020	Closed on 11/01/2021
1992177-202011-N1	Minor	2.1.2	26/11/2020	Open

**3.5 Stakeholders and previous land owner / user 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 IOI Pamol Kluang and supply bases 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.

<b>List of Stakeholders contacted</b>	
<b>Internal Stakeholders</b> General workers	<b>Union/Contractors/Neighbours</b> Kampung Gajah

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Mill operators Harvesters Sprayers Gender committee representative	Kampung Sri Tambak Sp Shine Mohd Saien Bin Amat Rama Plantation And Transportation Cha Mun Ye Chin Kau Lai Kwai Heng Ta Czhck Keowg
<b>Government Departments</b> Sjk (C) Kg Gajah Sek Keb Ladang Pamol	<b>NGO</b>

Stakeholders comment	
<b>1</b>	<p><b>Issues:</b></p> <p>Representative of Imago Enterprise informed that it provides three tractors for transporting FFB from estate to Mill. Imago Enterprise has four workers and they live at the workers' housing at Ladang Pamol Timur. The workers stay there rent-free, and do not have to pay for electricity and water. The workers can also benefit from free medical treatment at the estate clinic. The workers receive piece-rated wages and receive their salaries on the 7<sup>th</sup> of every month. Minimum amount received was RM1,500 per month. The representative of Imago Enterprise also informed that IOI Pamol Kluang extend meeting invitations which either him or his supervisor would attend. The representative is aware of the complaints and grievance procedure. He confirmed that there are no issues with any of the units within IOI Pamol Kluang certification unit.</p> <p><b>Management Responses:</b></p> <p>Comments were noted.</p> <p><b>Audit Team Findings:</b></p> <p>No further action.</p>
<b>2</b>	<p><b>Issues:</b></p> <p>Headmaster of Sekolah Kebangsaan Ladang Pamol. So far Ladang Pamol certification unit has extended good cooperation to the school. Among the assistance rendered to the school were:</p> <ul style="list-style-type: none"> <li>- Providing free domestic water supply to school (Pamol POM)</li> <li>- Widening of access road (Pamol Timur Estate)</li> <li>- Grass cutting (Pamol Timur Estate)</li> <li>- Deepening of drains (Pamol Timur Estate)</li> </ul> <p>The headmaster said he requested fund for school children's welfare and was told he would need to submit a proposal for consideration. Confirmed that during the stakeholder meeting held on 2 November 2020, a briefing on grievance mechanism was given.</p> <p><b>Management Responses:</b></p> <p>Comments were noted.</p> <p><b>Audit Team Findings:</b></p> <p>No further action.</p>

<p><b>3</b></p>	<p><b>Issues:</b></p> <p>Representative of Kg Gajah informed that there has been no dispute with the Pamol Kluang unit of certification. She found out recently during stakeholder meeting on 2 November 2020 that rubbish was thrown near the estate boundary. However, she doesn't know who threw the rubbish there. Pamol Kluang workers do come to Kg Gajah to make purchases at the nearby night market and to eat at the restaurants. So far there has been no social issues involving Pamol Kluang workers. There are also several people from Kg Gajah who are employed by Pamol Kluang.</p> <p><b>Management Responses:</b></p> <p>Comments were noted.</p> <p><b>Audit Team Findings:</b></p> <p>No further action.</p>
<p><b>4</b></p>	<p><b>Issues:</b></p> <p>Representative from Kg Seri Tambak also confirmed that there has been no adverse issues with Pamol Kluang certification unit. The village was established in 1991 and is located about 4 kms away from the Mill. There is no issue related to pollution. The management of Pamol Kluang has been very cooperative and sometimes assist by sending clean water to be used during festival/ celebration event. The stakeholder is aware of the complaint procedure and confirmed that Pamol Kluang certification unit does provide job opportunities to the local community from Kg Seri Tambak.</p> <p><b>Management response:</b></p> <p>Comments were noted.</p> <p><b>Audit team:</b></p> <p>No further action.</p>
<p><b>5</b></p>	<p><b>Issues:</b></p> <p>The NUPW officer - IOI harvesters are among those in Johor who are paid rate higher than average. He is of the view that the harvesters would receive more wages if earnings are based on bunches harvested, compared to overtime pay.</p> <p><b>Management response:</b></p> <p>Comments were noted.</p> <p><b>Audit team:</b></p> <p>No other issue.</p>
<p><b>6</b></p>	<p><b>Issues:</b></p> <p>Workers' Representatives (NUPW, different nationalities) – They informed that the management is treated all the workers without any discrimination. Overtime and benefits were offered to the workers equally. They are understood on the complaint and grievance procedure. Their wages are achieved Minimum Wage Order 2020 and overtime was paid according to the legal requirements. Free housing and subsidized water &amp; electricity was provided to all the workers. For new workers, they informed that no recruitment fee being paid to the agents. They are only paid the statutory fees that allowed by the country.</p> <p><b>Management response:</b></p> <p>The management noted on the comments.</p> <p><b>Audit team:</b></p>

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	No other issue.
<b>7</b>	<b>Issues:</b> Gender Committee representatives – They informed that no case of sexual harassment and violence reported. They are aware of the complaint procedure if there is any case reported on sexual harassment and violence. They also informed that they are consulted for the pregnancy testing. They have the freedom to give consent to the management to carry out the pregnancy testing as a monitoring measure for those who handle chemical.
	<b>Management response:</b> The management noted on the comments and will continue to monitor if there is any case of sexual harassment and violence.
	<b>Audit team:</b> No other issue.
<b>8</b>	<b>Issues:</b> Smallholder – He informed that no encroachment of land by the management. He accesses the estate’s road for free. The smallholder used the weighbridge for weighing their FFB crop for free by the management.
	<b>Management response:</b> The management will continue to support smallholders and ensure no encroachment of land.
	<b>Audit team:</b> No other issue.



List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Pamol Plantations Sdn. Bhd. (Unilever Group)	2003	11673.27	Yes	No	Yes, ownership changed due to estate bought over by IOI Corporation Berhad on 17/01/2003
N/A					
<b>Notes:</b>					

Previous land owner / user comment	
	<b>Feedbacks: N/A</b>
	<b>Management Responses: N/A</b>
	<b>Audit Team Findings: N/A</b>

**3.6 Impartiality and conflict of interest**

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team consist of Muhammad Fadzli Masran, Hu Ning Shing and Mahzan Munap

**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 IOI Pamol Kluang POM and supply bases has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (MYNI 2019) 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 IOI Pamol Kluang POM and supply bases is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<p><b>Name:</b>  <b>Muhammad Fadzli Masran</b></p>	<p><b>Name:</b>  <b>Ravi Tony</b></p>
<p><b>Company Name:</b>  <b>BSI Services (M) Sdn. Bhd.</b></p>	<p><b>Company Name:</b>  <b>IOI Plantation Services Sdn. Bhd.</b></p>
<p><b>Title:</b>  <b>Client Manager</b></p>	<p><b>Title:</b>  <b>Manager - Sustainability, Safety and Health</b></p>
<p><b>Signature:</b></p> 	<p><b>Signature:</b></p> <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><b>Date: 04/03/2021</b></p>	<p><b>Date: 05/03/2021</b></p>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides 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><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang complex has briefed to the stakeholders on the information that are accessible by the stakeholders upon request during the stakeholder meeting conducted on 02/11/2020. Seen the list of information could be access as below but not limited to:</p> <ul style="list-style-type: none"> <li>a) Sustainability certifications requirements</li> <li>b) Grievance reporting procedure</li> <li>c) Negotiation procedure</li> <li>d) Land use compensation procedure</li> <li>e) Stakeholder request procedure</li> <li>f) Company’s policies</li> <li>g) Safety &amp; Health plan</li> <li>h) Environment &amp; Social management action plan</li> <li>i) Continuous improvement plan</li> <li>j) Water management plan</li> </ul> <p>Besides, sustainability related documents and annual reports could be obtained and accessible via the company’s website, <a href="http://www.ioigroup.com">www.ioigroup.com</a>.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The documents are available in English and Bahasa Malaysia. All these documents are available in the mill and estates and accessible to all the stakeholders.</p>	Complied

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1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>Pamol Timur Estate, Pamol Kluang POM and Unijaya Estate has established and implemented Response/ Complaint/ Grievance Book to record any requests and complaints from stakeholders.</p> <p>Generally, the requests and complaints are related to housing repair or request from stakeholder on repair job. Sampled of the requests and complaints as below:</p> <ul style="list-style-type: none"> <li>a) Worker from Camp 15 complained that the blockage of septic tank on 22/01/2020. The management has arranged Indah Water to inspect and clean the septic tank. The desludging process was carried out on 24/01/2020 and seen the payment voucher with S/N: 62695 dated 24/01/2020.</li> <li>b) Worker from Camp 12 has requested in JCC meeting to have <i>gotong-royong</i> for compound of mill camp on 03/10/2020. The request has registered in the Complaint/ Grievance Book and the management has arranged the cleaning activity on 07/10/2020. Seen the photo evident of the actions taken that attached in the Complaint/ Grievance Book.</li> </ul>	Complied
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>IOI Group has developed Stakeholder Request Procedure Flowchart (SOP: 6.11, Appendix: 10.0, Rev: 1A dated 17/01/2017) to outline the process of stakeholder request. Social Liaison Officer will handle any request or complaints from stakeholders. As per the flowchart, the stakeholders will be informed of actions within 5 working days.</p> <p>Assistant Manager of Pamol Timur Estate, Pamol Kluang POM and Unijaya Estate has been appointed as Social Liaison Officer by the</p>	Complied

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		<p>Estate Manager and Mill Manager. Appointment letter dated 24/08/2020, 06/07/2020 and 14/09/2020 was available.</p> <p>Stakeholder meeting was conducted on 02/11/2020 for whole Pamol Kluang complex. Stakeholders such as government authorities, NGOs, smallholders, local communities, contractors and suppliers were attended the meeting. The procedure above has been briefed during the meeting as sighted in the meeting minutes. Interviewed with the stakeholder confirmed that they are understood on the procedure. Positive and negative comments were recorded in the minutes with proposed action to be taken to resolve the negative comments.</p> <p>Besides, stakeholder meeting for internal was conducted on 11/11/2020 in Pamol Timur Estate. Minutes was sighted, and issues raised were incorporated into an action plan. For eg:</p> <ul style="list-style-type: none"> <li>a) Issue: The main road from the mill to Pamol Barat Estate was in bad condition with many pot holes by contractor. Action Plan: The management will take immediate action to repair the road if the weather condition is good. Time Bound: November 2020 Management Review: The management has repaired the pot holes by filling with soil on 14/11/2020. Continuous repair work will be carried out accordingly.</li> <li>b) Issue: Workers did not wear face mask when entering the sundry shop. Action Plan: The management will carry out briefing on the SOP for Covid-19 again. Time Bound: November 2020 and continuous</li> </ul>	
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		<p>Management Review: The management has conducted a briefing on the SOP for Covid-19 during the morning muster on 19/11/2020 and seen the attendance list of the briefing.</p> <p>Pamol Kluang Palm Oil Mill has conducted Internal Stakeholder’s Meeting on 18/09/2020 which involved the participation of internal workers. A social impact action plan was developed to mitigate negative impact and promote positive impact identified by the targeted group. For eg:</p> <ul style="list-style-type: none"> <li>a) The worker from electrical department was suggested to have a briefing on whistleblowing to all non-clerical staff and workers. The management has conducted the briefing on 15/10/2020 and seen the record of attendance. Training evaluation was carried out by the Assistant Manager.</li> <li>b) Myanmar worker informed that the water dispenser was malfunction in JCC meeting conducted on 16/09/2020. The management has obtained quotation from 3 suppliers and made Non-budgeted requisition (NBR) request on 03/11/2020 to Mill Controller for the purchase of water dispenser. Seen the NBR# NBR/PMM 015/20-21 and it has approved by the Mill Controller. Currently is waiting for HQ to issue the Material Code Number followed by Purchase order to be issued.</li> </ul> <p>Unijaya Estate has carried out internal stakeholder meeting with the workers and internal contractors on 22/10/2020. There was one issue raised by the worker regarding the complaint procedure. The management has briefed on the grievance procedure during morning muster to all the workers. Interviewed with the complainant and other workers confirmed that they understood the</p>	
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		grievance procedure and understood how to lodge complaint if there is any defect in the houses.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Stakeholder List 2020 (SOP: 6.2, Appendix: 1.0, Rev: 1C dated 01/01/2020) was developed in Pamol Timur Estate (last updated on 16/11/2020), Pamol Kluang Palm Oil Mill and Unijaya Estate (last updated on 12/10/2020). Details of the stakeholders such as address, contact person and contact numbers are available in the stakeholder list. Stakeholders comprise of government authorities, suppliers, contractors, embassies, NGOs, neighboring estates and smallholders, local communities, schools and workers' representatives.	Complied
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	IOI Group has developed and implemented Code of Business Conduct & Ethics dated August 2018 and Business Ethics, Compliance, Anti-corruption and Anti-money Laundering Policy dated 060919. The policies are to ensure employees' business decisions follow their commitment to the highest ethical standards and law. Briefing of the policy was conducted on 14/12/2019 to the management and 19/11/2020 for workers in Pamol Timur Estate. Pamol Kluang POM has conducted briefing on policy to workers on 15/10/2020. Besides, seen the additional requirements for Contractors and Service Providers that signed by the contractors where there was specific clause here the contractors/ service providers are commit to a code of ethical conduct and integrity.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	The management is implemented the policy and monitor the compliance of the policy by IOI Group and internal audits will be conducted at regular intervals and as when deemed necessary. Any wrong doing could be reported to Group Legal Counsel. Besides, appointment of Legal Liaison Officer in Pamol Timur Estate was available and appointment letter dated 24/08/2020 was sighted.	Complied

		The duties of the Legal Liaison Officer are to constantly monitor and update the management on the day to day compliance to laws and regulations.	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Region Certification Unit (CU) had identified and documented forty nine sets of legal requirements as applicable to its business. Latest update include Employees Minimum Standard of Housing, Accommodation and Amenities (Accommodation and Centralized Accommodation) Regulations 2020.</p> <p>At estates and mill assessed, sighted among others the lists of business licences, equipment and machinery permits, competent persons and review of documentations to verify implementation of legal requirements. Generally, the auditors found they were in order.</p> <p>Sample among the above named documents as follows:</p> <p><b><u>Pamol Kluang POM</u></b></p> <ol style="list-style-type: none"> <li>1) Energy commission license serial #005983/2017, installation #ST (SJB) P/S/JHR/00128 for 3400 kW valid until 10/08/2021.</li> <li>2) MPOB license 500040104000 dated 01/04/2020 until 31/03/2021 for total of 288,000 mt FFB.</li> <li>3) Weighbridge SN B444206682 Mettler Toledo – IND 780, 80 tonnes Sijil Penentuan B1501279 inspected on 29.07.2020</li> <li>4) Fire Certificate No. 17/2019 valid through 21.01.2022</li> </ol>	Complied

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- 5) Diesel license ref #BPGK/JH (KLU)0273 SK for 18,000 liter valid from 27/02/2020 until 26/02/2021.
- 6) Energy Commission License for Private Installation of 3400kw electricity supply expiry date 9.8.2021.
- 7) Competent Persons
  - a. Authorised Gas tester and Entry Supervisor (AGTES) For Confine Space

Position	Expiry date	Certificate No.
Mill Manager	8.4.2021	NW-HQ-AE-1610-P
Asst. Mill Manager	16.7.2021	HQ/19/AGTES/01/03181

- b. Authorised Gas tester and Entry Supervisor (AGTES) For Confine Space

Position	Expiry date	Certificate No.
Fitter	15.4.2021	NW-NJHR-AE-2425-R
Boilerman	15.4.2021	NW-NJHR-AE-2421-R
Biogas Operator	15.4.2021	NW-NJHR-AE-2423-R
Lab Technician	15.4.2021	NW-NJHR-AE-2424-R

- 8) Full time Yellow Book Safety Supervisor Certificate No. SL/20/OSHC/02/00671
- 9) CePPOME, Mill Manager bearing Certificate No. CePPOME/00032
- 10) CePSWaM, Asst. Mill Manager bearing Certificate No. CePSWaM/03617

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		<p>11) Steam Engineer, Mill Manager, Grade 1</p> <p>12) 1 A4 Chargeman I/C No. 630219-08-5587 and 1 A0 Chargeman I/C No. 880515-05-5085</p> <p>13) 4 Boilerman Grade 2</p> <p><b><u>Pamol Timur Estate</u></b></p> <p>1) MPOB-licence no 504178602000 to sell and move FFB validity period 1.6.2020 – 31.5.2021</p> <p>2) Firearm License KLG/1566 effective 28.11.2020</p> <p><b><u>Unijaya Estate</u></b></p> <p>1) Animals Act 1953 – Veterinar Vaccination EMD P2 on 8.10.2020 given to 21 buffaloes (pregnant), Deworming, blood sample, Vitamin and Tagging on 7.9.2020 for 22 heads.</p> <p>2) MPOB-licence no 504524202000 to sell and move FFB validity period 1.8.2020 – 31.9.2021</p> <p>3) River water extraction (BAKAJ) license no.: 07/A/KLG/091 (validity period until 31/12/2020) by Director of Water Resources Johor for usage quantity of 50m3/day</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The Certification Unit assessed continued to use their established Legal Requirement Register. Legal compliance updated on 21.11.2019 is ensured primarily via the following process:</p> <ul style="list-style-type: none"> <li>it is periodically reviewed by each Certification unit with guidance from the Peninsular Malaysia Sustainability, Safety and Health Department to ensure changes in law are</li> </ul>	Non-compliance

		<p>updated, compliance met and non-compliance are mitigated.</p> <ul style="list-style-type: none"> <li>• the respective mill and estate Manager has assigned one executive as PIC responsible for compliance assurance and tracking changes in regulatory requirement.</li> <li>• annually, an RSPO Internal Audit is conducted and Lead by Manager Sustainability, Safety and Health and assisted by Mill / Estate Manager independent of the Certification unit being audited) to determine compliance of operations with legal requirements. Audit records were sighted maintained.</li> <li>• a system established to track changes in laws/regulations are through the following means;             <ul style="list-style-type: none"> <li>a) Subscribed to Lexis-Nexis Malaysia</li> <li>b) News release through daily newspaper.</li> <li>c) Internet (e-federal gazette, www.e-warta.com.my)</li> <li>d) Law change tracked by book publisher (MDC Book Publications).</li> <li>e) Circulars from relevant association (e.g. MPOA, MPOB, MAPA/NUPW)</li> </ul> </li> <li>• the Head office IOI Legal Department alert all certification units on legal updates. Process flow for the Legal updating is shown in Mechanism for Tracking Changes in Law reviewed dated 31 March 2020.</li> </ul> <p>Nonetheless, during site visit at the POM Biogas plant, the auditor noted found the Atlas Copco Unfired Pressure Vessel (air compressor) was operating without DOSH Permit to Install and Permit to Operate thus in gross violation of Regulation 7 (Installation of machinery) of the Factories and Machinery</p>	
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		<p>(Notification, Certificate of Fitness and Inspection) Regulations 1970. <b>A Minor NCR has been raised.</b></p> <p>Unijaya</p> <p>The estate has acquired 'Permit Kebenaran menggunakan Bekalan Air Persendirian' from labour Department as per permit no. TK(NJ).KG/43 dated 22/9/2019. In the permit stated that the estate shall obtain water quality analysis report at minimum of once per 3 months.</p> <p>However, the estate on conducted the domestic water quality analysis once a year for 2019 as per report reference no. ENV/WTR/UJE/175 in July 2019. For 2020, the domestic water quality analysis was conducted on 3/11/2020, however the report has yet to receive by the estate.</p> <p>The water quality analysis conducted was not follow the requirement as stated in the permit. These shows that the monitoring of changes to the permit requirement was not effectively implemented.</p> <p>Thus, NC were raised.</p>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Boundary markers are clearly demarcated and visibly maintained. Among those visited, sighted, verified and able to GPS marked (able to connect to satellite) to be within the boundary perimeter of the CU were:</p> <p>1. At Pamol Timur Estate:</p> <ul style="list-style-type: none"> <li>✓ Block 09E bordering oil palm farmer, Mr. Too boundary marker coordinates 2<sup>o</sup> 48.717'N, 102<sup>o</sup>27.5648'E, and</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>✓ Block 04A bordering Kg. Gajah near Kluang - Mersing main road (unable to connect to satellite due to surrounding trees canopy blocking/covering)</li> <li>2. At Unijaya Estate               <ul style="list-style-type: none"> <li>✓ Block PR19 bordering oil palm smallholder, Mr. 1<sup>0</sup> 56.097' N, 103<sup>0</sup> 19.925' E</li> </ul> </li> <li>3. At Pamol POM and Biogas plant the area is fenced all around.</li> </ul>	
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of all contracted parties are available at Pamol Timur Estate, Unijaya Estate and Pamol Kluang POM. It is documented in Stakeholder List, SOP 6.2, Appendix 1.0 Rev.18. The list is grouped by Suppliers, Contractors and Transporters. It is updated recently in November 2020 on different dates by each Certification unit.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>No third party FFB is received by the Pamol Kluang POM. All FFB supplied to Pamol Kluang POM are from IOI owned estates, that is, Pamol Timur Estate, Pamol Barat Estate, Unijaya Estate, Mamor Estate, Kahang Estate and Swee Lam Estate.</p> <p>Contracted parties are subject to Audit by IOI Sustainability, Safety &amp; Health Department to ensure they conform to the applicable laws laid in the contract, especially with respect to no child labor, forced labor, trafficked labor and their employees are paid meeting Minimum Wage Order 2020 and Employment Act 1955. It is an on-going process as the CU has just begun conducting due diligence with Transporters.</p>	Complied



2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>All Certification units at this CU do not enter a contract with suppliers. Purchases of goods, equipment and consumables are through Purchase Order raised. The contract documents sighted, 2 from each sampled Contractors and Transporters confirmed that clauses disallowing child, forced and trafficked labour had been incorporated and Transporters interviewed confirmed their workers are all local adult Malaysians.</p>	Complied																																
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.																																			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Their evidence of ownership is presented in their respective land titles shown below, quit rent paid and the MPOB license as sighted at the assessed estates.</p> <p><b>Pamol Kluang POM</b></p> <table border="1" data-bbox="1137 837 1935 900"> <thead> <tr style="background-color: #008000; color: white;"> <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><b>Pamol Timur Estate</b></p> <table border="1" data-bbox="1137 991 1935 1177"> <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><b>Unijaya Estate</b></p> <table border="1" data-bbox="1137 1268 1935 1348"> <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> </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	Complied
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Pamol Plantations S/B	GRN89327	1966	6.6039
Pamol Plantations S/B	GRN455592	2554	7.7699
Pamol Plantations S/B	GRN505630	2555	7.1882
Pamol Plantations S/B	GRN94164	2586	78.0790
Pamol Plantations S/B	GRN94155	2682	19.1972

Unijaya Estate has the most land titles comprising mainly small land size, 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.

Geo locations of FFB origins from IOI owned estates are as follows:

Name of estate	Site address	GPS Reference of the site office	
		Longitude	Latitude
<b>Pamol Timur</b>	Jalan Kluang – Mersing, 86000 Kluang, Johor	2° 6' 43.01"	103° 23' 08.3"
<b>Pamol Barat</b>	Jalan Kluang – Paloh, 86000 Kluang, Johor	2° 6' 46.9"	103° 20' 38.0"
<b>Mamor</b>	Jalan Kluang – Paloh, 86000 Kluang, Johor	2° 8' 43.1"	103° 18' 21.5"
<b>Unijaya</b>	Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 86090 Kluang Johor	1° 56' 26.1"	103° 16' 41.5"
<b>Kahang</b>	Peti Surat 14, 86700 Kluang, Johor	2° 19' 55.73"	103° 29' 51.83"

		<b>Swee Lam</b>	K.B. 107, 81000, Kulai, Johor	1 <sup>o</sup> 40' 29.0"	103 <sup>o</sup> 39' 13.6"	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	This indicator is not applicable as all FFB processed by Pamol Kluang POM is strictly and only sourced from IOI owned plantations.			Complied	
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>						
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.						
3.1.1	<b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	There is no Scheme Smallholders at this CU.  A 5 Year Business Plan updated in July 2020 was sighted. It included Area Statement, Crop by Year of Planting, FFB Monthly Breakdown, 10 Years Replanting Program, Summary Replanting Program By Field, Detail Replanting Program By Field, Executive/Staff and Workers Requirement, Mature Oil Palm Costing Statement, General Charges Statement and Summary Replanting Cost to Maturity.			Complied	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Sighted replanting program that showed no replanting envisage for the next four years at Pamol Timur Estate. Last replanting was at Block 20A involving 12 ha (by IOI Research) started in January / February 2020. However, at Unijaya Estate the next 5 years replanting program will only be in FY 2023/24 involving 64 ha. The Business Plan is reviewed annually.			Complied	
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.	At Regional level, management reviews were held at planned intervals. For example, Risk Assessment was held twice a year at 6-monthly interval following the assessment conducted at every			Complied	

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	<p>- Minor compliance -</p>	<p>Certification unit. Another platform being used is the Management Review Meeting by Pamol Region, conducted once a year subsequent to RSPO Internal Audit (by the IOI Sustainability, Safety &amp; Health Department). Sighted, its last review meeting minutes that took place on 9.6.2020 chaired by Regional Manager. In attendance were Mill Advisor, Sustainability Manager, Pamol Kluang POM Manager and the 6 Estate Managers of the CU.</p>	
<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continuous improvement plan was available and maintained at all assessed sites. Sampled the following as examples:</p> <p>The Pamol Kluang POM CIP on environmental are:</p> <ol style="list-style-type: none"> <li>1) to reduce black smoke emission from boiler by installing boiler emission control system and comply with Ringlemann Chart 1;</li> <li>2) to reduce the fuel usage (fibre &amp; shell) at Biogas plant by installing new gas burner directly link to boiler for combustion purpose]</li> <li>3) to reduce the chloride content to meet MPOB requirement by installing new CPO Washing Plant at Oil Room.</li> </ol> <p>Meanwhile, the CIP at Pamol Timur Estate are</p> <ol style="list-style-type: none"> <li>1) to reduce use of rat baits via alternative means, that is, training stray dogs for rat hunting;</li> <li>2) to collect rain water in the field to provide drinking water for buffalo and watering beneficial plant during dry season via installing more culvert for water catchment;</li> </ol>	<p>Complied</p>

		<p>3) to reduce exhaust emission (thereby depleting of natural resources) from tractor and back bucket transporting POME and EFB to field by utilising buffalo cart and wheel barrow;</p> <p>4) application of EFB and POME to replace chemical fertilizers;</p> <p>5) maintenance of riparian buffer zone and no spraying of chemicals at buffer zone.</p> <p>On the other hand, Unijaya environmental CIP are:</p> <p>1) at replanting area, adherence to IOI Policy of Zero burning. Alternative environmental friendly approach used, that is, oil palm trees were felled, chipped, mowed and pulverized which resulted as nutrient recycling yielding added benefit of GHG reduction whereby chemical fertilizer is sparingly used;</p> <p>2) Good Agricultural Practice per Agricultural Manual where special attention were given to planting on steep slope, among them were: (a) construction of planting terrace with backward slope to allow consolidation of soil spoilt and to serve as catchment for water run-off and (b) construction of stop bunds;</p> <p>3) avoid planting on inaccessible steep slope and maintain its vegetation;</p> <p>4) others at non-steep and hilly areas are similar to CIP at Pamol Timur Estate.</p> <p>On the social CIP among them they include following:</p> <p>1) open job vacancy for local communities;</p>	
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		<ul style="list-style-type: none"> <li>2) more social activities and events between mill/estate management and workers;</li> <li>3) to upgrade 3 units of Mill Camp Quarters;</li> <li>4) to build a new playground at Mill Camp;</li> <li>5) to improve workers understanding by conducting social training with emphasis on contents that they know company is taking care of their welfare.</li> </ul>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b> The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required. - Minor Compliance -</p>	<p>The RSPO metrics template has not been finalized by RSPO Secretariat. Hence this requirement is not yet applicable during this assessment.</p> <p>Note, although the ACOP was submitted past the dateline given, the RSPO website has not been updated with the latest information.</p> <p>The GHG reporting was submitted to the assessment team for assessment. Completing this assessment, the PalmGHG will be submitted to RSPO Secretariat.</p> <p>IOI have established the IOI Environmental &amp; Social Template monitoring the environmental, social and safety performance of the company. IOI has also published their annual sustainability report in the IOI Group website.</p>	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>Written Standard Operating Procedures (SOPs) for estates and mill are available and maintained at each Certification unit assessed. It covers procedures as required by the RSPO P&amp;C MYNI:2019.</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>The company's management process and operations are guided by the following documents:</p> <ol style="list-style-type: none"> <li>1. Group Standard Operating Procedures (StOP) for Palm Oil Mill Operations dated 01 July 2017;</li> <li>2. Group Safe Operating Procedures (SaOP);</li> <li>3. Group Occupational Safety and Health Guidance for Estate Workers (in Bahasa Malaysia);</li> <li>4. Group Standard Operating Procedure (StOPs) for estate dated 18 February 2017;</li> <li>5. Group Social Impact Assessment and Management Action Plans (Guidance Document) dated 10 October 2011;</li> <li>6. Group Environmental Impact Assessment and Management Action Plans dated December 2007;</li> <li>7. Internal Audit procedure dated 3 May 2018.</li> </ol> <p>The StOPs reflect best industry practices as detailed in IOI's agricultural policy document. Aside from StOPs for operations of mill and estates there exists also SaOPs for management but not limited to:</p> <ul style="list-style-type: none"> <li>• Consultation and communication;</li> <li>• Negotiation on compensation;</li> <li>• Guidance and procedure for gifts and hospitality;</li> <li>• Selection and contracting of contractors including recruitment agencies;</li> <li>• Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination;</li> <li>• Procedures for Supply Chain;</li> <li>• Internal Audit procedure for Supply Chain;</li> <li>• Remediation and Compensation Procedure (RaCP);</li> <li>• Accident and emergency procedures;</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Proper disposal of waste material.</li> </ul>	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	Records had been kept by the staff assigned for each operation to monitor the implementation of the procedure and report progress of work. The records were then checked by Assistant, Estate/Mill Manager, Agronomist and Plantation/Mill Advisor regularly.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>Records of monitoring were checked maintained and documented at the estates and mill. They carry out daily recording and monitoring through field and mill inspection. The monitoring was overseen by all levels of the supervisory personnel. In addition to them, there were regular visits by GM, Plantation Controller, Mill Controller, Safety and Sustainability team; their purpose varies including monitoring certification unit performance. The respective Certification unit Management then prepare monthly reports for submission to Head office for screening, comment and feedback for improvement.</p> <p>Examples sighted at estates were:</p> <ul style="list-style-type: none"> <li>• Social and Environmental Aspects Improvement Plan;</li> <li>• Plan to reduce pollution and emissions;</li> <li>• Integrated Pest Management Plan;</li> <li>• Water Management Plan;</li> <li>• Monitor pay &amp; wages to ensure pay in accordance to Labour law.</li> </ul> <p>Examples sighted at Pamol Kluang POM were:</p> <ul style="list-style-type: none"> <li>• water quality;</li> <li>• safety and environmental performance monitoring;</li> </ul>	Complied



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		<ul style="list-style-type: none"> <li>• Mill Processing throughput – FFB processed, OER, KER, CSPO, CSPK, Operating costs;</li> <li>• CAPEX Expenditures.</li> </ul> <p>The records of monitoring and mitigation measures taken over the past 12 months were sighted maintained at each Certification unit.</p>	
<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting activity at the estates visited.</p> <p>Pamol Timur Estate</p> <p>The estate has conducted the Environmental Impact Assessment with consideration of impact to the stakeholders as per report Environmental Impact Assessment, Pamol Timur Estate November 2020 to October 2025 dated 11/11/2020.</p> <p>Social</p> <p>Sustainability Team, Peninsular Malaysia has conducted the Social Impact Assessment which last reviewed on November 2020 for Pamol Timur Estate, Pamol Kluang POM and Unijaya Estate. The methodology of the assessment was based on site visit, informal interview and documentation analysis. Impacts are assessed during this assessment as below:</p> <ol style="list-style-type: none"> <li>Existence of major foreign labour force</li> <li>Coexisting neighbouring local communities</li> <li>Infrastructure and facilities</li> <li>Safety and security</li> <li>Local social development needs</li> </ol>	<p>Complied</p>

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		<p>The assessment was conducted based on risk assessment matrix. The stakeholders were involved during the stakeholder meeting conducted on 02//11/2020.</p> <table border="1" data-bbox="1151 466 1926 1104"> <thead> <tr> <th rowspan="2">Type of Aspects</th> <th rowspan="2">Type of Impacts</th> <th colspan="2">Risk Assessment</th> <th rowspan="2">Score (Significance) L x C</th> </tr> <tr> <th>Likelihood (L)</th> <th>Consequence (C)</th> </tr> </thead> <tbody> <tr> <td>Existence of major foreign labour force</td> <td>Fair treatment of foreign workers</td> <td>5</td> <td>5</td> <td>25</td> </tr> <tr> <td>Coexisting neighbouring local communities</td> <td>Customary land</td> <td>0</td> <td>1</td> <td>0</td> </tr> <tr> <td>Local social development needs</td> <td>Women Empowerment</td> <td>3</td> <td>3</td> <td>9</td> </tr> </tbody> </table>	Type of Aspects	Type of Impacts	Risk Assessment		Score (Significance) L x C	Likelihood (L)	Consequence (C)	Existence of major foreign labour force	Fair treatment of foreign workers	5	5	25	Coexisting neighbouring local communities	Customary land	0	1	0	Local social development needs	Women Empowerment	3	3	9	
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3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The certification unit visited has conducted Environmental Impact Assessment to assess the impact of mill activities to the environment.</p> <p>The estate has develop mitigation plan base on the assessment conducted. The mitigation plan include the activity, type of impact, management control/mitigation plan, document to review, person responsible and timeline.</p> <p>Pamol kluang POM</p>	Complied																						

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		<p>The mill has conducted the Environmental Impact Assessment as per report Environmental Impact Assessment, Pamol Mill dated 12/11/2020.</p> <p>Pamol Timur Estate The estate has conducted the Environmental Impact Assessment as per report Environmental Impact Assessment, Pamol Timur Estate November 2020 to October 2025 dated 11/11/2020. Latest update was done to the replanting operation.</p> <p>Unijaya Estate The estate has conducted the Environmental Impact Assessment as per report Environmental Impact Assessment, Unijaya Estate November 2020 to October 2025 dated 11/11/2020. Latest update was done to the replanting operation.</p> <p>Social Social Management Plan was developed and reviewed on November 2020 in Pamol Timur Estate, Pamol Kluang POM and Unijaya Estate after the stakeholder meeting conducted on 02/11/2020 with the participation of relevant stakeholders and other meetings such as JCC meeting, safety meeting and WEC meeting. The management plan has incorporated the type of impact, action plans &amp; monitoring, documents to be reviewed, management review, comments and time bound and the person in charge. Verified and found the management has taken action accordingly. For eg: the security guard at Unijaya reported that the water pressure is low from the water tank as the location of the water tank is inappropriate. The management has taken action to</p>	
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		relocate the water tank and constructed into a higher level to have a better water pressure. Seen the photo evident that the new water tank has been relocated.									
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The mill has develop mitigation plan base on the assessment conducted. Sighted the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>1. The mill monitor the oil trap to ensure no spillage of oil into the monsoon drain. Sighted the Monitoring checklist – oil trap for oil trap no. 1 – 6 dated 4/9/2020, 19/9/2020, 28/10/2020, 10/6/2020, 22/6/2020 and 11/7/2020.</li> <li>2. The mill use the the fibre and shell as renewable energy for boiler fuel. Sighted the monitoring records of fibre and shell usage FY 2020 as todate October 2020.</li> <li>3. The mill monitor the disposal of dried POME disposed through geo-tube. Sighted the monitoring recods as follows:</li> </ol> <table border="1" data-bbox="1155 895 1928 1098"> <thead> <tr> <th>Month</th> <th>Weight (tons)</th> </tr> </thead> <tbody> <tr> <td>June 2020</td> <td>172.61</td> </tr> <tr> <td>September 2020</td> <td>87.57</td> </tr> <tr> <td>October 2020</td> <td>135.59</td> </tr> </tbody> </table> <p>Pamol Timur Estate</p> <p>The estate has develop mitigation plan base on the assessment conducted. Sighted the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>1. The estate has established the replanting schedule documented in Time Table of Works, Replanting Oil Palm to</li> </ol>	Month	Weight (tons)	June 2020	172.61	September 2020	87.57	October 2020	135.59	Complied
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		<p>Oil palm dated 3/7/2020. The schedule has been communicated and agreed by the appointed contractors.</p> <ol style="list-style-type: none"> <li>2. The estate continuously provide training on the environmental aspects to the workers involve in replanting. Sighted the training records as follows:             <ol style="list-style-type: none"> <li>a. Water quality index monitoring training dated 28/10/2020</li> <li>b. Buffer zone for sprayers training conducted on 12/10/2020</li> <li>c. IPM – Rat census and baiting training dated 28/10/2020</li> <li>d. IPM – beneficial plant training dated 28/10/2020</li> <li>e. IPM – barn owl management training dated 28/10/2020</li> <li>f. Replanting workers training dated 20/8/2020</li> </ol> </li> </ol> <p>Unijaya Estate</p> <ol style="list-style-type: none"> <li>1. Silt pit were constructed along the field road to conserve water as sighted in in field PR15B.</li> <li>2. Water conservation terrace and planting terrace were constructed as sighted in replanting area of PR19.</li> </ol> <p>The last reviewed of the social management plan was on November 2020. The plan will be reviewed on annual basis with the participation of stakeholders.</p>	
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**Criterion 3.5:** A system for managing human resources is in place.

3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>IOI Group has developed Employment Procedure Guidelines for Local Workers (Recruitment, Selection &amp; Hiring) with Ref.: Plantation/HR/2020/SOPs and Foreign Workers Recruitment Guideline &amp; Procedure in Malaysia revised on July 2018. Besides, Guidelines on Staff Movement (for Operating Centres) – Promotion of Existing Employee: from Worker to Staff – Local was developed to explain the promotion process. In addition, Appendix H – Termination and Appendix F – Retirement has been developed as well to outline the process of termination and retirement of workers.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Interviewed with the Assistant Manager in Pamol Timur Estate and Assistant in Pamol Kluang Estate confirmed that they displayed job vacancy banner and job advertisement in front of the guard house at the entrance gate and neighbouring villages. Seen the banner and job advertisement where job available and wages are published on the banner. Besides, the estate management also registered and posted the job vacancy in MYFutureJobs where person who interested could be register via <a href="http://www.myfuturejobs.gov.my">www.myfuturejobs.gov.my</a>. The last recruitment was on 01/09/2020 in Pamol Timur Estate and seen the records of recruitment such as Application for Employment form, copy of identification card, employment contract, Employee Identification cum Input Document and induction training records.</p>	Complied
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Certification units assessed continued to use the established HIRARC procedure and update its HIRAC Register. POM HIRARC Register was updated on 8.8.2020, Pamol Timur Estate on 6.11.2020 and Unijaya Estate on 22.9.2020.</p>	Complied

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		<p>At the mill the HIRAC undertaken covers activities from receipt of FFB from transporter for grading through loading into cages for sterilization through subsequent processing steps converting to finished product (crude palm oil), bulk storage and despatch of CPO, the generation and treatment of by products and wastes to peripheral supporting activities such as store operations, weighbridge, maintenance of equipment and machineries, waste management and caring of effluent treatment plant, on-site security, etc.</p> <p>Likewise, at the estate, HIRAC was develop beginning from field preparation for replanting through planting of leaf cover crop, manuring, herbicides spraying, pest and disease control, harvesting, evacuation of crop and other secondary activities such as chemical pre-mixing, store management, transporting of workers, implements and fertilizers, workshop operations, etc.</p> <p>They were reviewed for completeness and effectiveness of the control measures taken.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.          - Critical (Major) compliance -</p>	<p>OSH Plan for 2020 dated January had been established and implemented at estates and mill assessed. It is being monitored monthly for its effectiveness by the Safety &amp; Health (SH) Manager, head office to ensure commitment as laid out in the Safety &amp; Health Policy is translated into action.</p> <p>Briefings to employees on safety policy are made through training and briefing forums. In addition, there were also briefings at muster ground being as refresher program for the employees. Safety procedures adherence are emphasised to the employees as part of the work culture. Content includes among others to prioritise safety, execute work safely,</p>	Complied

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and adhere all safety rules and regulations and to target zero accident. Safety policy and targets were available on display board printed in both English & Bahasa Malaysia.

No.	Safety and health program at POM	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 before commence work and 12-monthly	Asst. Manager / EHA / Sustainability Supervisor (SS)
5	OSH Policy	Asst. Manager
6	Firefighting 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, Hearing Conservation Program	Asst. Manager / Supplier
11	Audiometric Test, CHRA, Noise Risk Assessment	DOSH Registered Assessor
12	Renewal of machine / equipment CF and Competent Person Certificates	DOSH
	Safety and health program at estates	PIC
13	Road maintenance	Asst. Manager
14	Water quality index	Asst. Manager
15	Induction program for new Field Workers	Asst. Manager



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		16	Oil trap maintenance	Asst. Manager	
		17	Motorcycle riding	Asst. Manager	
		18	Please refer to Safety & Health Training conducted at estates and mill in indicator 3.7.2 below for trade related training.		
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.					
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Documented training program was sighted available at all assessed mill and estates. Sustainability program that includes training was planned before the start of each new year.</p> <p>All employees and contractors were given training related to their job skills, RSPO P&amp;C MYNI:2019 requirements, Occupational Health &amp; Safety, Social and Environmental matters. The training program specified the target group of employees to be trained. Training on SOP for individual workstation are not just classroom training but include field/workplace demonstration to ensure workers:</p> <ul style="list-style-type: none"> <li>• wear PPE correctly;</li> <li>• understand the hazards and risk their work activities posed; and hence the need to</li> <li>• follow the recommended mitigation measures; and</li> <li>• recognize any deviations from the stipulated operating criteria may lead to accident to self and fellow workers.</li> </ul> <p>The effectiveness of training was evaluated during training itself and post training at workplace. Standard Evaluation form were used. It was to gauge trainee reactions (attitudes, interests, values), learning (how well learners have retained knowledge delivered and skills shown), behavior change (how well learners</p>			Complied

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		has put knowledge gained into practice), and improvements in job-related outcomes.																																								
3.7.2	Records of training are maintained. - Minor Compliance -	<p>Training records are maintained in employee’s individual file as well as well as training subject file. Extracted below are samples of training programs delivered that covered requirements of the RSPO P&amp;C MYNI:2019.</p> <table border="1" data-bbox="1151 624 1926 1390"> <thead> <tr> <th data-bbox="1151 624 1240 679"></th> <th data-bbox="1240 624 1693 679">Program</th> <th data-bbox="1693 624 1926 679">Date conducted</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="1151 679 1926 735"><b>Pamol Kluang POM</b></td> </tr> <tr> <td data-bbox="1151 735 1240 820">1</td> <td data-bbox="1240 735 1693 820">Confined Space Entry - yearly and repeated before entering confine space</td> <td data-bbox="1693 735 1926 820">18.8.2020</td> </tr> <tr> <td data-bbox="1151 820 1240 904">2</td> <td data-bbox="1240 820 1693 904">Working at height - yearly and repeated before commencement of work</td> <td data-bbox="1693 820 1926 904">2.9.2020</td> </tr> <tr> <td data-bbox="1151 904 1240 960">3</td> <td data-bbox="1240 904 1693 960">Lockout Tagout - yearly</td> <td data-bbox="1693 904 1926 960">2.3.2020</td> </tr> <tr> <td data-bbox="1151 960 1240 1016">4</td> <td data-bbox="1240 960 1693 1016">Hearing Conservation - yearly</td> <td data-bbox="1693 960 1926 1016">22.1 and 4.9.2020</td> </tr> <tr> <td data-bbox="1151 1016 1240 1072">5</td> <td data-bbox="1240 1016 1693 1072">PPE training - yearly</td> <td data-bbox="1693 1016 1926 1072">3.7.2020</td> </tr> <tr> <td data-bbox="1151 1072 1240 1128">6</td> <td data-bbox="1240 1072 1693 1128">Emergency / Fire Drill - yearly</td> <td data-bbox="1693 1072 1926 1128">10.11.2020</td> </tr> <tr> <td data-bbox="1151 1128 1240 1184">7</td> <td data-bbox="1240 1128 1693 1184">SOP Loading Ramp - yearly</td> <td data-bbox="1693 1128 1926 1184">13.3 and 29.9.2020</td> </tr> <tr> <td data-bbox="1151 1184 1240 1240">8</td> <td data-bbox="1240 1184 1693 1240">SOP Lab, Effluent, WTP, Biogas - yearly</td> <td data-bbox="1693 1184 1926 1240">8.9.2020</td> </tr> <tr> <td data-bbox="1151 1240 1240 1295">9</td> <td data-bbox="1240 1240 1693 1295">SOP Boiler / Engine driver - yearly</td> <td data-bbox="1693 1240 1926 1295">5.3 and 15.9.2020</td> </tr> <tr> <td data-bbox="1151 1295 1240 1351">10</td> <td data-bbox="1240 1295 1693 1351">SOP Electrical - yearly</td> <td data-bbox="1693 1295 1926 1351">29.2 and 25.8.2020</td> </tr> <tr> <td data-bbox="1151 1351 1240 1394">11</td> <td data-bbox="1240 1351 1693 1394">SOP - Sterilizer / Capstan - yearly</td> <td data-bbox="1693 1351 1926 1394">20.2 and 13.8.2020</td> </tr> </tbody> </table>		Program	Date conducted	<b>Pamol Kluang POM</b>			1	Confined Space Entry - yearly and repeated before entering confine space	18.8.2020	2	Working at height - yearly and repeated before commencement of work	2.9.2020	3	Lockout Tagout - yearly	2.3.2020	4	Hearing Conservation - yearly	22.1 and 4.9.2020	5	PPE training - yearly	3.7.2020	6	Emergency / Fire Drill - yearly	10.11.2020	7	SOP Loading Ramp - yearly	13.3 and 29.9.2020	8	SOP Lab, Effluent, WTP, Biogas - yearly	8.9.2020	9	SOP Boiler / Engine driver - yearly	5.3 and 15.9.2020	10	SOP Electrical - yearly	29.2 and 25.8.2020	11	SOP - Sterilizer / Capstan - yearly	20.2 and 13.8.2020	Complied
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12	SOP - Nut & Kernel - yearly	20.2 and 20.8.2020
<b>Pamol Timur Estate</b>		
13	IPM - Rat census & baiting, Barn owl management and Beneficial plant	27.10.2020
14	Contractor and Sub-Contractor training on Sustainability Matters	27.9.2020
15	Company policies, Grievance/Complaint Procedure, Sexual Harassment Reporting Procedure	22.7 & 23.9.2020
16	Disposal of Scheduled Waste	2.2 and 28.7.2020
17	RSPO, MSPO & ISCC Training	25.2.2020
<b>Unijaya Estate</b>		
18	First Aid Training	12.8.2020
19	SOP Premixing chemicals and SDS	25.6.2020
20	SOP - Buffalo Assisted Harvesting	26.6 and 2.11.2020
21	SOP - Chemical Sprayers	7.3.2020
22	SOP - FFB Harvesting	6.11.2020
23	SOP - Manuring	21.10.2020
24	SOP - Tractor driving & Transport	2.3. and 1.10.2020

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<p>3.7.3</p>	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>At the estates in terms of traceability, FFB are marked by unique identification given to each harvester. Also, specifically the Pamol Kluang POM has sourced and processed its FFB strictly from RSPO P&amp;C MYNI:2019 certified oil palm plantation belonging to IOI Group. Therefore, the mill adopt CPO Identity Preserved model only. The Pamol Kluang POM is also certified to RSPO P&amp;C MYNI:2019</p> <p>All those involved in handling the FFB from estates including clerk issuing Delivery Consignment Note, and receiving parties at mill - Security, Weighbridge Clerk, Supervisor, Assistant Manager and Despatcher are aware to complete and prepare up to date records and reports that demonstrate compliance with IOI established procedures covering the implementation of all the elements of the supply chain model requirements. SCCS Training at the mill was conducted on 12 May 2020 covering all critical control points.</p> <p>Interviewing those involved showed that they were able to demonstrate awareness of the organization's procedures for the implementation of this standard.</p> <p>When confirming the sale of certified oil palm products, the Pamol Kluang POM 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. Other information completed and presented in delivery note, shipping documents and specification documentation include:</p> <ul style="list-style-type: none"> <li>✓ The name and address of the buyer;</li> <li>✓ The name and address of the seller;</li> <li>✓ The loading or delivery date;</li> <li>✓ The date on which the documents were issued;</li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>✓ The quantity of the products delivered;</li> <li>✓ Any related transport documentation;</li> <li>✓ A unique identification number.</li> </ul>	
<p><b>Criterion 3.8:</b> Supply chain requirement for mills          (note: All supply chain requirements are considered as <b>Critical (C)</b>. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p><b>Identity Preserved Module</b></p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>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 Mass Balance Module is applicable.</p>	<p>As per SOP established and documented in CSFFB, CSPO &amp; CSPK Traceability System for Estates, Mill, Warehouses and Trading Company, refer document no. RSPO/SOP/COC/4 issue no 1 dated 1/1/2020 stated as follow:</p> <p>4. Reception of Raw Material</p> <p>4.1. FFB crop (Goods in)</p> <p>4.1.1. IOI's RSPO certified Palm Oil Mills shall only receive crop exclusively from its own RSPO certified estates. The mill shall verify the FFB originates from a certified estate. Non – certified FFB crop must be rejected.</p> <p>The only mill received FFB from sister estate from Pamol Kluang Region. The FFB supplier were listed in FFB Supplier list.</p>	Complied
3.8.2	<p><b>Mass Balance Module</b></p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The mill only received FFB from sister estate from Pamol Kluang Region. The FFB supplier were listed in FFB Supplier list.</p>	Complied

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3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified 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.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Complied																		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Seen the Member ID: RSPO_PO1000000109 and license valid until 15/3/2021.</p> <p>Sampled the transaction ID as below:</p> <p>CSPO</p> <table border="1" data-bbox="1153 880 1928 1034"> <thead> <tr> <th>Date</th> <th>ID</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td>15/7/2020</td> <td>TR-387f4816-ce40</td> <td>523.22</td> </tr> <tr> <td>2/12/2019</td> <td>TR-20e6fbc6-21f4</td> <td>502.17</td> </tr> </tbody> </table> <p>CSPK</p> <table border="1" data-bbox="1153 1129 1928 1279"> <thead> <tr> <th>Date</th> <th>ID</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td>26/10/2020</td> <td>TR-94cb8290-se08</td> <td>100.00</td> </tr> <tr> <td>12/12/2019</td> <td>TR-222be026-7d53</td> <td>100</td> </tr> </tbody> </table>	Date	ID	Volume	15/7/2020	TR-387f4816-ce40	523.22	2/12/2019	TR-20e6fbc6-21f4	502.17	Date	ID	Volume	26/10/2020	TR-94cb8290-se08	100.00	12/12/2019	TR-222be026-7d53	100	Complied
Date	ID	Volume																			
15/7/2020	TR-387f4816-ce40	523.22																			
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26/10/2020	TR-94cb8290-se08	100.00																			
12/12/2019	TR-222be026-7d53	100																			
3.8.5	Documented procedures	Procedure for supply chain has been established and documented in CSFFB, CSPO & CSPK Traceability System for Estates, Mill, Warehouses and Trading Company, refer document no.	Complied																		

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	<p>The mill 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:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) 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 mill’s procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>RSPO/SOP/COC/4 issue no 1 dated 1/1/2020 and in RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP), refer document no. RSPOSC/SOP/IP/3 revision no. 7 dated 21/9/2020. Among the subjects covered in the procedure are:</p> <ol style="list-style-type: none"> <li>1. Purpose</li> <li>2. Scope</li> <li>3. Supply chains models and requirements</li> <li>4. Responsibilities</li> <li>5. Procedure details             <ul style="list-style-type: none"> <li>5.1. Internal audit</li> <li>5.2. Handling complaints</li> <li>5.3. Handling non-conformities</li> <li>5.4. Handling RSPO products</li> <li>5.5. Downgrading and mass balance traceability</li> </ul> </li> <li>6. Reception of raw material</li> <li>7. Processing and storage</li> <li>8. Dispatch of mill produce</li> <li>9. Records and retention</li> <li>10. Training</li> <li>11. Claims</li> <li>12. Overproduction</li> </ol> <p>The estate continuously provide training to all personnel involve in the supply chain system. Latest training was conducted on 20/10/2020.</p>	
3.8.6	Internal Audit	As per SOP established and documented in CSFFB, CSPO & CSPK Traceability System for Estates, Mill, Warehouses and Trading	Complied

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	<p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Company, refer document no. RSPO/SOP/COC/4 issue no 1 dated 1/1/2020, under section 5.1 internal Audit.</p> <p>Latest internal audit was conducted on 28/9/2020 by the Sustainability Safety and Health Department Executive. 3 non-conformities were raised during the audit and has been addressed by the mill and effectively closed and verified by the internal auditor.</p> <p>Results of the internal audit has been discussed in the Management review meeting. Sighted the minutes meeting dated 15/10/2020.</p>					
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Procedure for supply chain has been established and documented in CSFFB, CSPO &amp; CSPK Traceability System for Estates, Mill, Warehouses and Trading Company, refer document no. RSPO/SOP/COC/4 issue no 1 dated 1/1/2020 and in RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP), refer document no. RSPOSC/SOP/IP/3 revision no. 7 dated 21/9/2020 under section Reception of raw material.</p> <p>Sighted the sampled FFB received as follows:</p> <table border="1" data-bbox="1151 1123 1924 1374"> <thead> <tr> <th colspan="2">RSPO Certified FFB</th> </tr> </thead> <tbody> <tr> <td data-bbox="1151 1174 1541 1374"> <p>i. Pamol Timur Estate Date:18/6/2020 C/N no.: PM2006182200358030M RSPO Cert. no.: RSPO 547027</p> </td> <td data-bbox="1541 1174 1924 1374"> <p>ii. Pamol Timur Estate Date:18/6/2020 C/N no.: PM200618195751030M RSPO Cert. no.: RSPO 547027</p> </td> </tr> </tbody> </table>	RSPO Certified FFB		<p>i. Pamol Timur Estate Date:18/6/2020 C/N no.: PM2006182200358030M RSPO Cert. no.: RSPO 547027</p>	<p>ii. Pamol Timur Estate Date:18/6/2020 C/N no.: PM200618195751030M RSPO Cert. no.: RSPO 547027</p>	<p>Complied</p>
RSPO Certified FFB							
<p>i. Pamol Timur Estate Date:18/6/2020 C/N no.: PM2006182200358030M RSPO Cert. no.: RSPO 547027</p>	<p>ii. Pamol Timur Estate Date:18/6/2020 C/N no.: PM200618195751030M RSPO Cert. no.: RSPO 547027</p>						



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		W. Ticket no.: FB19012160 Net Weight: 6790 kg	W. Ticket no.: FB19012159 Net Weight: 11200 kg	
		Pamol Timur Estate Date:18/6/2020 C/N no.: PM200618195528030M RSPO Cert. no.: RSPO 547027 W. Ticket no.: FB19012158 Net Weight: 9350 kg	Kahang Estate Date:19/6/2020 C/N no.: 38829 RSPO Cert. no.: RSPO 547027 W. Ticket no.: FB19012239 Net Weight: 37250 kg	
		Kahang Estate Date:19/6/2020 C/N no.: 38827 RSPO Cert. no.: RSPO 547027 W. Ticket no.: FB19012238 Net Weight: 41750 kg	Kahang Estate Date:19/6/2020 C/N no.: 38816 RSPO Cert. no.: RSPO 547027 W. Ticket no.: FB19012237 Net Weight: 42950 kg	
3.8.8	<b>Sales and Goods Out</b> The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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): a) The name and address of the buyer;	Addressed in CSFFB, CSPO & CSPK Traceability System for Estates, Mill, Warehouses and Trading Company, refer document no. RSPO/SOP/COC/4 issue no 1 dated 1/1/2020 and in RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP), refer document no. RSPOSC/SOP/IP/3 revision no. 7 dated 21/9/2020 under section Dispatch of mill produce. Sampled of the sales and goods out delivery records as below: <b>CSPO A</b>		Complied

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	<ul style="list-style-type: none"> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<ul style="list-style-type: none"> <li>a. The name and address of the buyer: IOI Global Services Sdn. Bhd.</li> <li>b. The name and address of the seller: Pamol Kluang POM</li> <li>c. The loading or shipment / delivery date: 25/6/2020</li> <li>d. The date on which the documents were issued: 25/6/2020</li> <li>e. RSPO certificate number: RSPO 547027</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPO/IP</li> <li>g. The quantity of the products delivered: 32380 kg</li> <li>h. Any related transport documentation: Weighbridge Ticket no.: CP19001227</li> <li>i. A unique identification number: Contract Ref.: 2031002965</li> </ul> <p><b>CSPO B</b></p> <ul style="list-style-type: none"> <li>a. The name and address of the buyer: IOI Global Services Sdn. Bhd.</li> <li>b. The name and address of the seller: Pamol Kluang POM</li> <li>c. The loading or shipment / delivery date: 8/6/2020</li> <li>d. The date on which the documents were issued: 8/6/2020</li> <li>e. RSPO certificate number: RSPO 547027</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPO/IP</li> <li>g. The quantity of the products delivered: 39230 kg</li> <li>h. Any related transport documentation: Weighbridge Ticket</li> </ul>	
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		<p>no.: CP19001218</p> <p>i. A unique identification number: Contract Ref.: 2031002853</p> <p><b>CSPK</b></p> <p>a. The name and address of the buyer: PGEO Oil Mill Sdn. Bhd.</p> <p>b. The name and address of the seller: Pamol Kluang POM</p> <p>c. The loading or shipment / delivery date: 1/6/2020</p> <p>d. The date on which the documents were issued: 1/6/2020</p> <p>e. RSPO certificate number: RSPO 547027</p> <p>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPK/IP</p> <p>g. The quantity of the products delivered: 41350 kg</p> <p>h. Any related transport documentation: Weighbridge Ticket no.: PK19000206</p> <p>i. A unique identification number: Contract Ref.: 2031002411</p>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p>	<p>No processing outsourced activities at the mill except for CPO transportation.</p> <p>The mill has legal ownership off all material as sighted in contract agreement between the company and transporter under section 5, subsection:</p> <p>v. Liable for losses</p> <p>vii. Damage to company property</p> <p>viii. Loss of oil in transit</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill 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 all information, when this is announced in advance.</li> </ul>	<p>The contractors shall provide cooperation to the appointed CB to conduct audit to their operations, system and information as stated in the Appendix IOI B: Transport Policy.</p> <p>Sighted sampled contract as follows:</p> <ol style="list-style-type: none"> <li>1. Contract agreement between Pamol Plantations Sdn. Bhd. with Sasaran Perentas Sdn. Bhd. dated 25/9/2019. Agreement period from 1/9/2019 to 31/8/2021.</li> <li>2. Contract agreement between Pamol Plantations Sdn. Bhd. with Makmur Transport Sdn. Bhd. dated 25/9/2019. Agreement period from 1/9/2019 to 31/8/2021.</li> <li>3. Contract agreement between Pamol Plantations Sdn. Bhd. with Yewtan Enterprise Sdn. Bhd. dated 25/9/2019. Agreement period from 1/9/2019 to 31/8/2021.</li> </ol>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The contact details of the contractors was included in the list of stakeholder list.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The contact details of the contractors was included in the list of stakeholder list.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> </ul>	<p>Addressed in RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP), refer document no. RSPOSC/SOP/IP/3 revision no. 7 dated 21/9/2020 under section 7. Records and Retention which stated that “All records and reports related to RSPO supply chain shall be retained for a minimum of 2 years period”.</p> <p>Verified during document review that the mill only received FFB from sister estate from Pamol Kluang Region. The FFB supplier were listed in FFB Supplier list.</p>	Complied

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	<p>iii) For Identity Preserved Module, the mill 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>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Pamol Kluang POM has established the Summary Report – ISCC &amp; RSPO/CSPO Production Monthly Movement sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Summary Report – ISCC &amp; RSPO/CSPO Production Monthly Movement sheet Jan 2019 – Dec 2019 and Jan 2020 – Oct 2020</p> <p>Positive stock deliveries maintained through the Summary Report – ISCC &amp; RSPO/CSPO Production Monthly Movement sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by Pamol Kluang POM as per Summary Report – ISCC &amp; RSPO/CSPO Production Monthly Movement sheet as at June 2020.</p>	
<p>3.8.13</p>	<p><b>Extraction Rate</b>  The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Actual rates were available in the Mill Daily Production Report. Sighted the sampled records for the month of September, October and todate November 2020.</p>	<p>Complied</p>
<p>3.8.14</p>	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.</p>	<p>Choose an item.</p>
<p>3.8.15</p>	<p><b>Processing</b>  For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil</p>	<p>Addressed in RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP), refer document no. RSPO/SC/SOP/IP/3 revision no. 7 dated 21/9/2020 under section 5. Processing &amp; Storage.</p>	<p>Complied</p>

	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p> <p>Based on the announcement (transaction) summary, all the registrations were found to be in order.</p> <p>Verified transaction and follows:</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p> <p>IOI Corporation Berhad has obtained Trademark License from RSPO with trademark license no. 2-0002-04-100-03 which valid till 18/12/2021.</p>	Complied
<b>General corporate communications</b>			
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). Thus, this indicator is not applicable	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <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>	No off-product claim made by Pamol Kluang POM as to date.	Complied

	e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rsपो.org' where the link must lead to the member's profile page.		
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.	No off-product claim made by Pamol Kluang POM as to date.	Complied
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.	No off-product claim made by Pamol Kluang POM as to date.	Complied
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 as verified through documentations and websites.	Complied
<b>Business to business communications</b>			
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.	Complied
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 SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number; RSPO 547027.	Complied
5.3	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: 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	Pamol Kluang POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Complied

	<p>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.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
<b>Business to consumer communication</b>			
6.1	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.	No business to consumer communication on product specific claim made by Pamol Kluang POM and only producing crude and unfinished product. This is not applicable for Pamol POM.	Complied
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 producing crude and unfinished product. This is not applicable for Pamol POM.	Complied
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 producing crude and unfinished product. This is not applicable for Pamol POM.	Complied
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 producing crude and unfinished product. This is not applicable for Pamol POM.	Complied
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 producing crude and unfinished product. This is not applicable for Pamol POM.	Complied
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 producing crude and unfinished product. This is not applicable for Pamol POM.	Complied



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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 producing crude and unfinished product. This is not applicable for Pamol POM.	Complied
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 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 <a href="http://www.rspo.org">www.rspo.org</a> .	No business to consumer communication on product specific claim made by Pamol Kluang POM and only producing crude and unfinished product. This is not applicable for Pamol POM.	Complied
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b> (delete if not applicable)			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.	Complied
	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	Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.	Complied

	<p>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><b>Labelling and trademark (IP)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• 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). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	<p>Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>
<p><b>Messaging (IP)</b></p>			
	<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"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	<p>Pamol Kluang POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The policy has been briefed to the stakeholders during stakeholder meeting on 02/11/2020. Besides, Pamol Timur Estate has conducted briefing of the policy to the workers on 22/09/2020 and 19/11/2020. Pamol Kluang POM has conducted briefing on policy to workers on 15/10/2020 and 02/11/2020 in Unijaya Estate.</p> <p>The policy was displayed at the notice board in front of the office and linesite in Pamol Timur Estate and Pamol Kluang POM.</p>	<p>Complied</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>IOI Group ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interviewed with the workers confirmed that no harassment by the management.</p>	<p>Complied</p>
<p><b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
<p>4.2.1</p>	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Group has developed Grievance Procedure (Doc. Ref.: IOI/P/GP/001, Rev. No.: 1 dated 20/01/2020) where IOI is committed to an open and transparent approach to resolve outstanding grievances with the involvement of affected stakeholders. Results of the process will be publicly disclosed. The company will annually review the procedure and consult with stakeholders during the stakeholder meeting to ensure continued effectiveness. IOI has aligned the Grievance Procedure with the UN</p>	<p>Complied</p>

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		<p>Guiding Principles on business and human rights for effective non-judicial grievance mechanism.</p> <p>Besides, Whistleblowing Policy (revised October 2019) was developed where the company encourages its employees and stakeholders to raise genuine concerns about suspected or possible violations of IOI Group’s policy. The complainant may remain anonymous when reporting. The whistle-blower will be accorded with protection of anonymity or confidentiality of identity. The investigation shall be completed within 2 weeks from date of receiving the whistleblowing. The channel of whistleblowing has outlined in the policy.</p> <p>The whistleblowing policy and the grievance process could be found in the company’s website as well.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>IOI Group has developed Grievance Procedure (Doc. Ref.: IOI/P/GP/001, Rev. No.: 1 dated 20/01/2020) where IOI is committed to an open and transparent approach to resolve outstanding grievances with the involvement of affected stakeholders. Results of the process will be publicly disclosed. The company will annually review the procedure and consult with stakeholders during the stakeholder meeting to ensure continued effectiveness. The method of report any grievances can be made via email to <a href="mailto:grievance@ioigroup.com">grievance@ioigroup.com</a>, call to the general line and in writing to IOI Corporation Berhad. Interviewed with the workers and stakeholders confirmed that they are understood on the procedure of grievance.</p>	Complied

4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Pamol Timur Estate, Pamol Kluang POM and Unijaya Estate has implemented Complaint/ Grievance Book and recorded all the complaints from stakeholders. Sampled of the complaints as below:</p> <p>a) Worker from Camp 15 complained that the blockage of septic tank on 22/01/2020. The management has arranged Indah Water to inspect and clean the septic tank. The desludging process was carried out on 24/01/2020 and seen the payment voucher with S/N: 62695 dated 24/01/2020.</p> <p>b) Worker from Camp 12 has requested in JCC meeting to have <i>gotong-royong</i> for compound of mill camp on 03/10/2020. The request has registered in the Complaint/ Grievance Book and the management has arranged the cleaning activity on 07/10/2020. Seen the photo evident of the actions taken that attached in the Complaint/ Grievance Book.</p> <p>The complainant has acknowledged after the action has been taken and issue was closed.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Refer to the procedure mentioned above, the complainant can involve a neutral third-party facilitator, mediator or special social, environmental expert, particularly where issues are complex or multiple groups are involved.</p>	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Pamol Kluang POM has made contribution to the local communities such as donation for schools' events and supplied drums to the school upon requested. Besides, foods supplied to the workers during the period of Movement Control Order by the management such as rice, cooking oil, water and other daily essential items.</p>	Complied

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		<p>Unijaya Estate’s management has taken initiative to repair the access road of smallholders that does not belong to Unijaya Estate. Seen the invoice# C2009162 of purchased of crusher run on 30/09/2020. Besides, the management also provided the free weighbridge usage to the smallholders whenever they harvest. This has confirmed by interviewed with the smallholders.</p>	
<p><b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.            - Critical (Major) compliance -</p>	<p>Documents showing legal ownership are available as below:  <b><u>Pamol Timur Estate:</u></b>            Total Land Title: 2,303.10 ha            Total 6 land titles and sampled as below:            a) Land Title No.: 88885; Lot No.: 2430; Area: 808.1572 ha; Ownership: Pamol Plantations Sdn Berhad            b) Land Title No.: 88881; Lot No.: 2429; Area: 4.0974 ha; Ownership: Pamol Plantations Sdn Berhad            c) Land Title No.: 90779; Lot No.: 2593; Area: 396.7942 ha; Ownership: Pamol Plantations Sdn Berhad            The mill is located in the Pamol Timur Estate and under the Land Title No.: 88881.  <b><u>Unijaya Estate:</u></b>            Total Land Title: 1,260.64 ha            Total 163 land titles and sampled as below:            a) Land Title No.: 87702; Lot No.: 2802; Area: 21.208 ha; Ownership: Pamol Plantations Sdn Berhad</p>	<p>Complied</p>

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		<p>b) Land Title No.: 100320; Lot No.: 3039; Area: 20.3733 ha; Ownership: Pamol Plantations Sdn Berhad</p> <p>c) Land Title No.: 101023; Lot No.: 3164; Area: 39.7477 ha; Ownership: Pamol Plantations Sdn Berhad</p> <p>d) Land Title No.: 95132; Lot No.: 1934; Area: 414.8027 ha; Ownership: Pamol Plantations Sdn Berhad</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.</p> <p>In case of any land dispute reported, Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) will be referred to.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.</p> <p>In case of any land dispute reported, Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner</p>	Complied

		Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) will be referred to.	
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.  In case of any land dispute reported, Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) will be referred to.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of 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 unit of certification's title, concession or lease on the land. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.  In case of any land dispute reported, Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) will be referred to.	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping	There is no land dispute recorded. This was verified through stakeholders' consultation. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by	Complied



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	<p>involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>smallholders and other plantation’s companies. There’s no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.</p> <p>In case of any land dispute reported, Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) will be referred to.</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders’ consultation. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation’s companies. There’s no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.</p> <p>In case of any land dispute reported, Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) will be referred to.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders’ consultation. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation’s companies. There’s no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.</p> <p>In case of any land dispute reported, Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev:</p>	Complied

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		1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) will be referred to.	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.  In case of any land dispute reported, Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) will be referred to.	Complied
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Document reviewed, site visit and interviewed with stakeholders confirmed that no new planting happened in both estates. The lands are legally owned by IOI Group. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	Document reviewed, site visit and interviewed with stakeholders confirmed that no new planting happened in both estates. The lands are legally owned by IOI Group. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied

	- Critical (Major) compliance -		
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	Document reviewed, site visit and interviewed with stakeholders confirmed that no new planting happened in both estates. The lands are legally owned by IOI Group. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	Document reviewed, site visit and interviewed with stakeholders confirmed that no new planting happened in both estates. The lands are legally owned by IOI Group. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Document reviewed, site visit and interviewed with stakeholders confirmed that no new planting happened in both estates. The lands are legally owned by IOI Group. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Document reviewed, site visit and interviewed with stakeholders confirmed that no new planting happened in both estates. The lands are legally owned by IOI Group. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent	Document reviewed, site visit and interviewed with stakeholders confirmed that no new planting happened in both estates. The lands are legally owned by IOI Group. The existing estates are not	Complied

	under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Document reviewed, site visit and interviewed with stakeholders confirmed that no new planting happened in both estates. The lands are legally owned by IOI Group. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
<b>Criterion 4.6:</b> 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.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) was developed to outline the negotiation for settlement and compensation.	Complied
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SOP as per indicator 4.6.1.  There was no dispute that involved compensation in Pamol Kluang complex verified through interviewed with the local communities.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	SOP as per indicator 4.6.1.  There was no dispute that involved compensation in Pamol Kluang complex verified through interviewed with the local communities.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	SOP as per indicator 4.6.1.	Complied

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	- Minor compliance -	There was no dispute that involved compensation in Pamol Kluang complex verified through interviewed with the local communities.	
<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Negotiation Procedure through Free, Prior and Informed Consent (SOP: 6.11, Appendix 5.0, Rev: 1A dated 17/01/2017) and Grievance Procedure for Land Owner Issue (SOP: 6.11, Appendix 4.0, Rev: 1A dated 17/01/2017) was developed to outline the negotiation for settlement and compensation.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SOP as per indicator 4.7.1.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	There was no community that have lost access and rights to land for plantation since there was no expansion by the company during the time of audit. However, the company has provided job opportunity to the local communities as this has verified through the master list of employees.	Complied
<b>Criterion 4.8:</b> 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.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied

4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p><b>Principle 5: Support smallholder inclusion</b></p>			
<p><b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>IOI Pamol Kluang POM has exclusively and strictly sourced its FFB from IOI own RSPO Certified Estates. In view that it has not received any smallholders' crops, hence it is not necessary to publish such price. This indicator is therefore deemed not applicable.</p>	Complied

5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).          - Critical (Major) compliance -</p>	<p>Since there is no smallholders crop involved, this indicator is therefore not applicable.</p>	Complied
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.          - Critical (Major) compliance -</p>	<p>Since there is no smallholders crop involved, this indicator is therefore not applicable.</p>	Complied
5.1.4	<p><b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.          - Critical (Major) compliance -</p>	<p>Again, since there is no smallholders crop involved, this indicator is deemed not applicable.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.          - Minor compliance -</p>	<p>Assessing the earthwork contract between Pamol Plantations Sdn Bhd (the Company) and Ah Teng Earthwork Construction Sdn Bhd (the Contractor) for land preparation and replanting works at Unijaya Estate.</p>	Complied
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.          - Critical (Major) compliance -</p>	<p>Referring to the above contract discovered that there is no time frame for payment stated in the contract document. Document trailing showed that Invoice No IV-2008-0004 dated 21 August 2020 from Ah Teng Construction Sdn Bhd for the sum of RM116,822.52 contains a 30-day term of payment. This amount remained unpaid as of the date of audit.  <b>Hence, an NCR has been raised.</b></p>	Non-compliance

5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Again, since there is no smallholders crop involved, this indicator is deemed not applicable.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Again, since there is no smallholders crop involved, this indicator is deemed not applicable.	Complied
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Again, since there is no smallholders crop involved, this indicator is deemed not applicable.	Complied
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	This indicator is not applicable as there was no smallholders within the CU.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	This indicator is not applicable as there was no smallholders within the CU.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	This indicator is not applicable as there was no smallholders within the CU.	Complied



	- Minor compliance -		
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	This indicator is not applicable as there was no smallholders within the CU.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	This indicator is not applicable as there was no smallholders within the CU.	Complied
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	IOI Group has developed and implemented Sustainable Palm Oil Policy revised October 2020 where the company provide fair and equal employment opportunities for all employees regardless of race, nationality, religion or gender. Besides, Equal Opportunity Employment & Freedom of Association Policies dated October 2017 was adopted as well.  The policy has been briefed to the stakeholders during stakeholder meeting on 02/11/2020. Besides, Pamol Timur Estate has conducted briefing of the policy to the workers on 22/09/2020 and 19/11/2020. Pamol Kluang POM has conducted briefing on policy to workers on 15/10/2020 and 02/11/2020 in Unijaya Estate.  The policy was displayed at the notice board in front of the office and linesite in Pamol Timur Estate and Pamol Kluang POM.	Complied
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.	Interviewed with the workers from different nationalities and gender confirmed that no discrimination happened in the company. The management treated all equally and provide equal opportunity	Complied

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	- Critical (Major) compliance -	for promotion based on capabilities. Female workers have been assigned as supervisor as well. There was no recruitment fee being paid by the workers during the time of audit through interviewed with the newly recruited workers.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	The recruitment of the employees is based on skills, capabilities, qualities and medical fitness as mentioned in the Employment Procedure Guidelines for Local Workers (Recruitment, Selection & Hiring). Promotion of the employee is based on performance and skills confirmed through interview with the management.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Interviewed with the female workers confirmed that no pregnancy testing is conducted by the company as a measure for recruitment. Hospital Assistant will be informed if they are pregnant for any job transfer if related to chemical handling. The female workers in Unijaya Estate have been briefed by the Hospital Assistant on 14/09/2020 regarding on the pregnancy testing once every three months as a monitoring measure. The workers have given freedom to agree or disagree to carry out the testing by the Hospital Assistant. They have signed on the Consent letter to carry out pregnancy testing (Doc. Ref.: IOI/G/SE/002, Rev. No.: 02 dated 14/08/2020) on 14/09/2020 by disagree on the testing. However, they will inform the management if they pregnant and management will arrange for alternate job if they are handling with chemical.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Women and Empowerment Committee (WEC) was established in Pamol Timur Estate and the last meeting was conducted on 10/09/2020. Issues such as cleanliness and hygiene of the housing area reported during the meeting was recorded in the minutes with action plan. All the actions have been taken accordingly. Interviewed with the female workers confirmed that no sexual harassment or violence case reported.	Complied

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		<p>The meeting of Women and Empowerment Committee was conducted on 30/05/2020 and 12/09/2020 in Pamol Kluang POM. Meeting minutes was sighted with issues reported. Actions have been taken by the management to resolve the issues. For eg: the female worker informed that the foreign workers did not wear properly after used the bathroom in mill camp. The management has reminded the workers during morning briefing on 17/09/2020 to ensure workers are with proper attire.</p> <p>The last meeting of Women and Empowerment Committee was conducted on 08/09/2020 where the Hospital Assistant has raised awareness on the current pandemic issue, Covid-19 to all the members. There was no issue reported by the members and interviewed with the representative confirmed that no case of sexual harassment and violence reported.</p>	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Reviewed on the total 50 payslips (December 2019, January 2020, March 2020, May 2020, June 2020, August 2020, September 2020 and August 2020) in Pamol Kluang Complex which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Overtime and work on rest day were paid according to Employment Act 1955.	Complied
<p><b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in	IOI has signed the Collective Agreement with National Union of Plantation Workers (NUPW) on 23/12/2019. Sample of workers agreement are reviewed and the agreements are signed in both	Complied

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	<p>national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Interviewed with workers confirmed that they have signed the agreement and the content was briefed at home country as well as in certification units in Malaysia. Translator is used for those who could not understand English/ Bahasa Malaysia. The sampled are as below:</p> <ul style="list-style-type: none"> <li>a) Employee No.: 1PPP/IOI/1112/443 (PTE)</li> <li>b) Employee No.: 1PPP/IOI/1116/511 (PTE)</li> <li>c) Employee No.: 1PPP/IOI/1019/3743 (PTE)</li> <li>d) Employee No.: 1PPP/IOI/1116/512 (PTE)</li> <li>e) Employee No.: 1PPP/IOI/0616/557 (PTE)</li> <li>f) Employee No.: 1PPP/IOI/0120/3942 (PTE)</li> <li>g) Employee No.: 1PPP/IOI/0120/3941 (PKPOM)</li> <li>h) Employee No.: 1PPP/IOI/0310/887 (PKPOM)</li> <li>i) Employee No.: 1PPP/IOI/0320/11732 (PKPOM)</li> <li>j) Employee No.: 1PPP/IOI/0419/915 (PKPOM)</li> <li>k) Employee No.: 1PPP/IOI/0719/3920 (PKPOM)</li> <li>l) Employee No.: 1PPP/IOI/0719/3921 (PKPOM)</li> <li>m) Employee No.: 1PPP/IOI/1115/763 (UJE)</li> <li>n) Employee No.: 1PPP/IOI/1115/764 (UJE)</li> <li>o) Employee No.: 1PPP/IOI/0817/19461 (UJE)</li> <li>p) Employee No.: 1PPP/IOI/0719/851 (UJE)</li> <li>q) Employee No.: 1PPP/IOI/0114/749 (UJE)</li> <li>r) Employee No.: 1PPP/IOI/0319/834 (UJE)</li> <li>s) Employee No.: 1PPP/IOI/0120/3985 (UJE)</li> </ul>	
<p>6.2.2</p>	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on</p>	<p>Sampled total 50 employment contracts and payslips (December 2019, January 2020, March 2020, May 2020, June 2020, August 2020, September 2020 and August 2020). It has clearly stated that the payment and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, reasons for dismissal, period of notice) in the employment contract.</p>	<p>Complied</p>

	<p>compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>								
<p>6.2.3</p>	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p><b>Unijaya Estate:</b></p> <p>Sampled one of the workers’ payslips and overtime records (Employee No: 1PPP/IOI/1115/764 - harvesting mandore) for June 2020 and October 2020 found that his overtime hours have exceeded the maximum limit of 104 hours without the approval from authority.</p> <table border="1" data-bbox="1137 695 1655 842"> <thead> <tr> <th>Month</th> <th>Hours of overtime</th> </tr> </thead> <tbody> <tr> <td>June 2020</td> <td>112</td> </tr> <tr> <td>October 2020</td> <td>109</td> </tr> </tbody> </table>	Month	Hours of overtime	June 2020	112	October 2020	109	<p>Complied</p>
Month	Hours of overtime								
June 2020	112								
October 2020	109								
<p>6.2.4</p>	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Medical facilities were provided free to all the workers. Unijaya Estate has the ambulance facility as well. Water and electricity were subsidized to the workers at certain amount. Houses were provided to the workers with maintenance by the management as well.</p> <p>Linesite inspection was carried out on weekly basis in Pamol Timur Estate and Pamol Kluang POM using the Monitoring Checklist – Linesite by Hospital Assistant. Seen the records of linesite inspection from August 2020 to November 2020.</p> <p>Hospital Assistant of Pamol Kluang POM has conducted linesite inspection on weekly basis and the last round of inspection was conducted on 21/11/2020 using the Monitoring Checklist – Linesite. As seen in the checklist found that all the condition of the housing area was satisfied and in good condition such as good flow of water and clean compound. However, during site visit to the linesite found the following issues:</p>	<p>Complied</p>						

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		<ul style="list-style-type: none"> <li>a) The houses are not kept in a good state of repair. Houses had missing window panes and rotting doors.</li> <li>b) The area surrounding the workers' housing are not maintained in a clean and sanitary condition.</li> <li>c) The drains behind houses No. 18 and No. 10 contain food debris and undergrowth which does not permit the free flow of water.</li> <li>d) House No. 18 had an extension that was leaning unsafely to one side.</li> </ul> <p>This has shown that the inspection was not carried out effectively. The mill has budgeted 8 units of workers quarters to be upgraded by June 2022 as verified in the Capital Expenditure Budget 2020 – 2021. Total RM 200,000 will be allocated. The management has applied to Labour Department in Kluang for the upgrading of quarters by applying the Certificate of Fitness and responded by the authority on 03/11/2020.</p> <p>Hospital Assistant has conducted linesite inspection on weekly basis and seen the records of inspection. Any issues found were recorded in the checklist and actions were taken accordingly. The last inspection was conducted on 24/11/2020. Site visit to the housing area found it is well maintained.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Pamol Kluang POM management has provided foods and essential supply to the workers during the MCO period such as rice, cooking oil and other necessity. This has been confirmed with the workers through interviewed.</p> <p>Besides, sundry shop is available inside the housing compound in Pamol Kluang POM, Pamol Timur Estate and Unijaya Estate. The workers can easily access to the foods and goods. They informed</p>	Complied

		that the pricing of the foods and goods are reasonable and affordable.	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO</i></p>	IOI Corporation Berhad has collaborated with Monash University, Sime Darby Berhad and United Plantations Berhad to establish a study on Decent and Fair Wages in Malaysia on 02/04/2020. The prevailing wage calculation has included all the in-kind benefits provided to the workers such as housing and healthcare. Until the DLW benchmark is finalized by RSPO, IOI has observed to pay the minimum wage.	Complied

	<p>will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>All the core works are performed by permanent and full-time employees in Pamol Kluang Complex. There were no casual or temporary workers used in the company.</p>	Complied
<p><b>Criterion 6.3:</b> The unit of Certification 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>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Group has developed and implemented Sustainable Palm Oil Policy revised October 2020 where the company uphold the right to freedom of association and recognize the right to collective bargaining and allow trade union to have access to the workers. Besides, Equal Opportunity Employment &amp; Freedom of Association Policies dated October 2017 was adopted as well.</p> <p>The policy has been briefed to the stakeholders during stakeholder meeting on 02/11/2020. Besides, Pamol Timur Estate has</p>	Complied



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		<p>conducted briefing of the policy to the workers on 22/09/2020 and 19/11/2020. Pamol Kluang POM has conducted briefing on policy to workers on 15/10/2020 and 02/11/2020 in Unijaya Estate.</p> <p>The policy was displayed at the notice board in front of the office and linesite in Pamol Timur Estate and Pamol Kluang POM.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>JCC Meeting was conducted on 30/10/2020 with representatives from different nationality in Pamol Timur Estate. Workers' Complaints/ Suggestions/ Proposals/ Information form was filled in before the meeting by the representatives. Issues were recorded in the meeting minute with action plan developed.</p> <p>Pamol Kluang POM has established Joint Consultative Committee (JCC) which formed by representatives of different nationalities and NUPW to discuss the workers' issues. The last meeting was conducted on 23/11/2020. There was one request to purchase volleyball netting for the leisure time for the workers. The management will allocate this request into the 2021/2022 budget.</p> <p>JCC Committee was established in Unijaya Estate and the last meeting was conducted on 22/10/2020 with the participation of representatives from different nationalities. The issues raised were incorporated into the Social Management Plan with actions have been taken to resolve the issues reported. Refer to indicator 3.4.2 for details.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interviewed with the NUPW representatives and workers' representatives confirmed that the representatives were elected by the workers without any interference from the management.</p>	Complied

**Criterion 6.4:** Children are not employed or exploited.

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6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>IOI Group has developed and implemented Sustainable Palm Oil Policy revised October 2020 where the company eliminate all forms of child labour. As per interviewed with the management, the minimum age of employment is 18 years old. The policy has been briefed to the stakeholders during stakeholder meeting on 02/11/2020. Besides, Pamol Timur Estate has conducted briefing of the policy to the workers on 22/09/2020 and 19/11/2020. Pamol Kluang POM has conducted briefing on policy to workers on 15/10/2020 and 02/11/2020 in Unijaya Estate.</p> <p>The policy was displayed at the notice board in front of the office and linesite in Pamol Timur Estate and Pamol Kluang POM.</p>	Complied
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The management will be obtained one copy of the identification card for the local workers during their application of job to verify their legal age as per the recruitment procedure. Document verified the master list of the workers confirmed that the minimum age of workers employed are above 18 years old.</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Master List and through interviewed with the stakeholders.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The stakeholders have been briefed on the Sustainable Palm Oil Policy revised October 2020 during stakeholder meeting on 02/11/2020. Besides, Pamol Timur Estate has conducted briefing of the policy to the workers on 22/09/2020 and 19/11/2020. Pamol Kluang POM has conducted briefing on policy to workers on 15/10/2020 and 02/11/2020 in Unijaya Estate.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

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<p>6.5.1</p>	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.          - Critical (Major) compliance -</p>	<p>IOI Group has developed and implemented Sustainable Palm Oil Policy revised October 2020 where the company promote a safe and healthy working environment that is free from sexual harassment and other hazards.</p> <p>Besides, Guidelines for Handling Harassment at Workplace (Doc. Ref.: IOI/G/SE/004, Rev. No.: 01 dated 21/10/2020) was implemented to provide an impartial process in dealing with harassment and sexual harassment.</p> <p>The policy has been briefed to the stakeholders during stakeholder meeting on 02/11/2020. Besides, Pamol Timur Estate has conducted briefing of the policy to the workers on 22/09/2020 and 19/11/2020. Pamol Kluang POM has conducted briefing on policy to workers on 15/10/2020 and 02/11/2020 in Unijaya Estate.</p> <p>The policy was displayed at the notice board in front of the office and linesite in Pamol Timur Estate and Pamol Kluang POM.</p>	<p>Complied</p>
<p>6.5.2</p>	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.          - Critical (Major) compliance -</p>	<p>IOI Group has developed and implemented Sustainable Palm Oil Policy revised October 2020 where the company protect reproductive health of women employees and promote women empowerment.</p> <p>Besides, Guidelines for Reproductive Health (Doc. Ref.: IOI/G/SE/002, Rev. No.: 02 dated 14/08/2020) was implemented to ensure that the reproductive health of the employees especially pregnant and nursing employees are protected and their rights and responsibilities clearly stated.</p>	<p>Complied</p>

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		<p>The policy has been briefed to the stakeholders during stakeholder meeting on 02/11/2020. Besides, Pamol Timur Estate has conducted briefing of the policy to the workers on 22/09/2020 and 19/11/2020. Pamol Kluang POM has conducted briefing on policy to workers on 15/10/2020 and 02/11/2020 in Unijaya Estate.</p> <p>The policy was displayed at the notice board in front of the office and linesite in Pamol Timur Estate and Pamol Kluang POM.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Guidelines for Reproductive Health (Doc. Ref.: IOI/G/SE/002, Rev. No.: 02 dated 14/08/2020) was implemented to ensure that the reproductive health of the employees especially pregnant and nursing employees is protected and their rights and responsibilities clearly stated. IOI Group has developed the New Mother’s Consultation Form (Rev: 1B dated 10/08/2020) where the form will be utilized if there is any new mother reported in the certification unit to consult their needs.</p> <p>There was no new mother reported in Pamol Timur Estate, Pamol Kluang POM and Unijaya Estate during the time of audit through interviewed with the workers.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>As per Guidelines for Handling Harassment at Workplace (Doc. Ref.: IOI/G/SE/004, Rev. No.: 01 dated 21/10/2020), Harassment Reporting Procedure and Sexual Harassment Reporting Procedure was implemented to record any form of complaints related to harassment. Any harassment related complaint will be handled by Employee Consultative Committee (ECC) and sexual harassment related complaint will be handled by Women and Empowerment Committee (WEC).</p>	Complied

**Criterion 6.6:** No forms of forced or trafficked labour are used.

<p>6.6.1</p>	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Through interviewed with the workers confirmed that they hold their passport by themselves. The management has given freedom to the workers to keep the passport at the locker prepared by the management for safe keeping or by holding themselves. The management has also implemented "No Recruitment Fee" policy where there is no any fee charging related to recruitment at any stage in the recruitment process. This has been verified by interviewed with the workers that recruited in Year 2020 that no recruitment fee has been paid to the agent or company prior to join the company. They only paid legal fee such as passport and medical cost in home country. They also informed that contract signed in the home country is identical with the one they signed in Malaysia. Overtime was offered to the workers on voluntarily basis. There is no penalty of early termination of employment as mentioned in the Foreign Workers Recruitment Guideline &amp; Procedure in Malaysia, revised July 2018. The workers are allow to tender resignation freely by serving notice period as agreed mutually.</p>	<p>Complied</p>
<p>6.6.2</p>	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>IOI has established several related policies and procedures including:</p> <ol style="list-style-type: none"> <li>1. IOI Plantation Foreign Workers Recruitment Guidelines &amp; Procedures in Malaysia revised 2018</li> <li>2. IOI Group Sustainable Palm Oil Policy revised October 2020</li> <li>3. Special Labour Policy and Procedures dated 15/7/2018</li> </ol> <p>The implementation has been carried out and verified through interviewed with the foreign workers and site visit. The company has provided decent housing, induction training to the foreign workers during their arrival, non-discrimination by treating all the workers equally, no recruitment fee collected by the agent or the company and no contract substitution.</p>	<p>Complied</p>

<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																														
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The person responsible for Safety &amp; Health at each Certification unit assessed had been identified and the 3-monthly Safety &amp; Health meeting held are as shown in the table below. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <table border="1" data-bbox="1137 638 1926 1045"> <thead> <tr> <th rowspan="2">Certification unit</th> <th rowspan="2">PIC</th> <th colspan="4">Meeting dates</th> </tr> <tr> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>Pamol Timur Estate</td> <td>Anwar Ridhwan B Rosli</td> <td>27.12.2019</td> <td>11.6.2020</td> <td>28.8.2020</td> <td>22.10.2020</td> </tr> <tr> <td>Pamol Kluang POM</td> <td>Chua Seng Wei (Safety Coordinator)</td> <td>7.1.2020</td> <td>13.5.2020</td> <td>14.7.2020</td> <td>14.10.2020</td> </tr> <tr> <td>Unijaya Estate</td> <td>Muhamad Nazam</td> <td>30.1.2020</td> <td>29.4.2020</td> <td>14.7.2020</td> <td>30.10.2020</td> </tr> </tbody> </table> <p>The Minutes of Meeting are kept maintained.</p>	Certification unit	PIC	Meeting dates				1st	2nd	3rd	4th	Pamol Timur Estate	Anwar Ridhwan B Rosli	27.12.2019	11.6.2020	28.8.2020	22.10.2020	Pamol Kluang POM	Chua Seng Wei (Safety Coordinator)	7.1.2020	13.5.2020	14.7.2020	14.10.2020	Unijaya Estate	Muhamad Nazam	30.1.2020	29.4.2020	14.7.2020	30.10.2020
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Unijaya Estate	Muhamad Nazam	30.1.2020	29.4.2020	14.7.2020	30.10.2020																									
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid</p>	<p>Accident and emergency procedures available in English and Bahasa Malaysia were updated on 1.10.2020 in flow chart form as per OSH (NADOOPOD) Regulations 2004. The credible accident scenarios highly likely to occur have been identified as shown below. Each of them has specific Emergency Action Plan to facilitate and organize</p>																												

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	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>employer and employee actions during workplace emergencies and have been explained in Bahasa Malaysia to the workforce.</p> <ol style="list-style-type: none"> <li>1. Physical Injury</li> <li>2. Chemical Spillage (Store/Premix Area)</li> <li>3. Chemical Spillage (Filed)</li> <li>4. Vehicle Accident</li> <li>5. Fire outbreak</li> <li>6. Major Spillage (CPO, Diesel or Lubricant)</li> <li>7. Fire in own field or neighbouring estate</li> <li>8. Chemical Poisoning - Highly Toxic Pesticides (Store/Field)</li> <li>9. Monitoring and Screening for Covid-19 Prevention</li> </ol> <p>Emergency / Fire drill is conducted annually to test the preparedness and ability of the Emergency Response Team to respond on one hand and to ensure non-ERT members follow established instructions and focuses on developing the critical skills needed to survive an emergency on the other hand. Debriefing following the drill is held to identify strengths and weaknesses and improve on any shortcomings.</p> <p>Assigned First Aiders are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for</p>	<p>PPE issued free of charge and acknowledgement of receipt records are maintained individually for all workers to cover all potentially hazardous operations as identified/recommended in the HIRARC Register, CHRA Report and Noise Risk Assessment Report. They are given to operatives in pesticide application, harvesting,</p>	Complied

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	<p>those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>equipment maintenance and machine operations. Sighted PPE issued include safety helmets, safety shoes, rubber boots, apron, gloves and goggles among others. Special PPE are also provided for workers assigned to work at height and in confined space.</p> <p>Room for Pesticides Sprayers to change out street clothings to PPE and vice versa after work including bathing and washing the soiled and contaminated PPE are available.</p>															
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care, employment injury and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4). Sighted the last three months (August, September and October 2020) payment made by each of the Certification unit assessed to SOCSO on Form A for foreign and local workers was available for review. All registered employees were checked contributed and covered by SOCSO.</p>	Complied														
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>All occupation injuries were recorded in accordance to OSH (NADOPOD) Regulations 2004.</p> <table border="1" data-bbox="1137 1145 1939 1391"> <thead> <tr> <th rowspan="2">Certification unit</th> <th colspan="2">JKKP 8 submitted to DOSH</th> </tr> <tr> <th>Date submitted</th> <th>Reference No.</th> </tr> </thead> <tbody> <tr> <td>Pamol Timur Estate</td> <td>10.01.2020</td> <td>JKKP8/40081/2019</td> </tr> <tr> <td>Unijaya Estate</td> <td>02.01.2020</td> <td>JKKP8/01117/2019</td> </tr> <tr> <td>Pamol Kluang POM</td> <td>18.01.2020</td> <td>JKKP8/15142/2019</td> </tr> </tbody> </table>	Certification unit	JKKP 8 submitted to DOSH		Date submitted	Reference No.	Pamol Timur Estate	10.01.2020	JKKP8/40081/2019	Unijaya Estate	02.01.2020	JKKP8/01117/2019	Pamol Kluang POM	18.01.2020	JKKP8/15142/2019	Complied
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		Accident records including accident notification, accident investigation, JKKP Form 6, 7 & 8 were well kept and reviewed during the OSH meeting.					
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>							
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.							
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM Plans are stated in IOI Group Standard Operating Procedure (StOP) For Planting of Beneficial Plants Index No. 17.1 dated December 2016 and Group Standard Operating Procedure (StOP) For Integrated Management of Rat Control Index No. 10.1 dated September 2007. Latest update on the IPM as per memorandum issued by the General Manager, IOI Research Center regarding the Rat Baiting Campaign dated 29/4/2020.</p> <p>Sighted the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>Rat baiting was conducted 2 campaign per year with interval of 6 months per campaign. Sighted the latest campaign record in Rat Baiting Record logbook as follows:</li> </ol> <table border="1" data-bbox="1137 1104 1926 1362"> <tr> <td>Field: PM 09G Date: 21/9/2020 – 19/10/2020 Rounds: 5 rounds Acceptance level: 20%</td> <td>Field: PM 04A Date: 23/9/2020 – 21/10/2020 Rounds: 5 rounds Acceptance level: 20%</td> </tr> <tr> <td>Field: PM 14B Date: 25/2/2020 – 3/3/2020</td> <td>Field: PM 09F Date: 20/2/2020 – 28/3/2020</td> </tr> </table>	Field: PM 09G Date: 21/9/2020 – 19/10/2020 Rounds: 5 rounds Acceptance level: 20%	Field: PM 04A Date: 23/9/2020 – 21/10/2020 Rounds: 5 rounds Acceptance level: 20%	Field: PM 14B Date: 25/2/2020 – 3/3/2020	Field: PM 09F Date: 20/2/2020 – 28/3/2020	Complied
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		<p>2. Barn owl census was conducted at 2 rounds per year. Ratio of barn owl boxes was at 1:8.41 ha. Latest census was conducted in May and June 2020. Occupancy rate stated at 43%.</p> <p>3. Beneficial plant at 60:20:20 <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, <i>Tunera Subulata</i> recorded in beneficial plant planting map. Sighted the beneficial plant planted along the main road and field road.</p>			
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.</p> <p>3 plant species were used for IPM such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, and <i>Antigonon leptopus</i>.</p>	Complied		
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There is no use of fire for pest control in the estates.</p>	Complied		
<p><b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>					
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The justification for chemical usage was available as per SOP: 4.6 under appendix: 3.0 Rev. 1b dated 120.11.20209. This justification include chemical such as Glyphosate, 2-4D methyl amine, Metsulfuron methyl, Triclopyr butoxy ethyl, Glufosinate and etc.</p> <p>In addition to the above, IOI Group Sustainable Palm Oil Policy, under item 4 Existing Plantation, Subheading Environmental Management states that: No use of paraquat and pesticides that are categorised as World Health Organisation Class 1A or1B.</p>	Complied		

		<p>The use of other Class 1 Chemicals (such as metamidophos and monocrotophos) approved by the Pesticides Board and included in the MPOB list of approved Pesticide for use in oil palm plantations can only be carried out under strict supervision and in absolutely necessary circumstances such as severe outbreak and critical pest infestation, and, with special method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.</p>																									
<p>7.2.2</p>	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.          - Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The table below shows records of weedicide /pesticide use in year 2020.</p> <p><b>Pamol Timur Estate</b></p> <table border="1" data-bbox="1137 879 1928 1222"> <thead> <tr> <th>Active ingredients</th> <th>Area sprayed, ha</th> <th>a.i/ha (kg/ha)</th> </tr> </thead> <tbody> <tr> <td>Glyphosate Isoprpylamine 41% (LD<sub>50</sub> rat 5000 mg/kg)</td> <td>10,320</td> <td>0.21777</td> </tr> <tr> <td>Triclopyr Butoxy Ethyl Esther 32.1% (LD<sub>50</sub> rat 2000 mg/kg)</td> <td>2,513</td> <td>0.07182</td> </tr> <tr> <td>2,4 D Amine, 60% (LD<sub>50</sub> rat 949 mg/kg)</td> <td>4,488</td> <td>0.05302</td> </tr> <tr> <td>3, 4 Dichlorophenyl 1,1 Dimethyi Urea, 42% (LD<sub>50</sub> rat 1017 mg/kg)</td> <td>2,591</td> <td>0.11306</td> </tr> <tr> <td>Metsulfuron methyl 20% (LD<sub>50</sub> rat 2000 mg/kg)</td> <td>2,328</td> <td>0.00389</td> </tr> </tbody> </table> <p><b>Unijaya Estate</b></p> <table border="1" data-bbox="1137 1321 1928 1374"> <thead> <tr> <th>Active ingredients</th> <th>Area sprayed, ha</th> <th>a.i/ha (kg/ha)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Active ingredients	Area sprayed, ha	a.i/ha (kg/ha)	Glyphosate Isoprpylamine 41% (LD <sub>50</sub> rat 5000 mg/kg)	10,320	0.21777	Triclopyr Butoxy Ethyl Esther 32.1% (LD <sub>50</sub> rat 2000 mg/kg)	2,513	0.07182	2,4 D Amine, 60% (LD <sub>50</sub> rat 949 mg/kg)	4,488	0.05302	3, 4 Dichlorophenyl 1,1 Dimethyi Urea, 42% (LD <sub>50</sub> rat 1017 mg/kg)	2,591	0.11306	Metsulfuron methyl 20% (LD <sub>50</sub> rat 2000 mg/kg)	2,328	0.00389	Active ingredients	Area sprayed, ha	a.i/ha (kg/ha)				<p>Complied</p>
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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The pesticide reduction plan was available included pesticide for rat, weed, bagworm and etc.</p> <p>The IPM plan was available, from the programme record the beneficial been done was available for year 2020 as per below detail:-</p> <table border="1"> <thead> <tr> <th rowspan="3">Type of Beneficial plant</th> <th colspan="4">2020 Planting in meters upto October</th> </tr> <tr> <th colspan="2">Pamol Timur Estate</th> <th colspan="2">Unijaya Estate</th> </tr> <tr> <th>Plan</th> <th>Actual</th> <th>Plan</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>Cassia</td> <td>89</td> <td>111</td> <td>1125</td> <td>1238</td> </tr> <tr> <td>Antigonan</td> <td>173</td> <td>200</td> <td>375</td> <td>410</td> </tr> <tr> <td>Turnera</td> <td>25</td> <td>36</td> <td>375</td> <td>410</td> </tr> </tbody> </table> <p>The Barn Owl Box census record, at Unijaya Estate as at May 2020 with total 53 BOB with occupancy 61.7 % while at Pamol Timur Estate as at June 2020 with a total of 249 BOB with occupancy rate of 43%.</p>	Type of Beneficial plant	2020 Planting in meters upto October				Pamol Timur Estate		Unijaya Estate		Plan	Actual	Plan	Actual	Cassia	89	111	1125	1238	Antigonan	173	200	375	410	Turnera	25	36	375	410	Complied
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Turnera	25	36	375	410																											

7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The IPM implementations described in Indicator 7.1.1 are meant to minimise the use of pesticides.</p> <p>There has been no prophylactic use of pesticides at the visited estates.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>IOI only purchase chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Sighting of the Chemical Register at the assessed estates showed that only class II, III &amp; IV chemicals were used. There were no Class 1A and Class1B agrochemicals used.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate were used instead.</p>	Complied
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides operators have been provided with proper PPE and PPE training. Observed during the site visit the PPE usage by the operators such as google, half face respirator, nitrile hand glove, long sleeve shite, long pants outside of Wellington rubber boot worn and apron were obediently followed.</p> <p>Records showed that pesticides were handled, used and applied by trained persons and as per the Safety Data Sheet (SDS) of the pesticide. The staff and workers such as the storekeepers,</p>	Complied

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		<p>sprayers, fertilizer and rat bait workers were trained (cross reference indicator 3.7.2 above) and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that the SDS were available at all sites chemical pre-mixing area and chemical store during the audit.</p>	
<p>7.2.7</p>	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.          - Critical (Major) compliance -</p>	<p>Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH (USECHH) Regulations (2000).</p> <p>At Pamol Timur and Unijaya Estates the storage of pesticides were in accordance with the Occupational Safety and Health Act 1994 (Act 514) and its Regulations and Orders and Pesticides Act 1974 (Act 149) and its Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OSH CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official.</p> <p>At these estates, their chemical stores were inspected and it was noted that they all comply with the relevant act as well as best practice.</p> <ul style="list-style-type: none"> <li>• All stores were secured under lock and key with restricted access.</li> <li>• Provision of ventilation fan.</li> <li>• Display of Safety Pictorial poster, namely the required PPE and chemical Safety hazards pictogram.</li> <li>• Pesticides were separated by class.</li> <li>• Daily balance of remaining solution after completing pre-</li> </ul>	<p>Complied</p>

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		<p>mixing were kept in the store under lock and key.</p> <ul style="list-style-type: none"> <li>• Concrete cemented floor, bund wall and provision of sump pond.</li> <li>• Store keeper was trained in the handling of all pesticides.</li> <li>• SDS leaflets were available at all pesticide stores.</li> </ul>																					
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticides containers of various sizes (100 gm to 20 liter) had been triple rinsed, 3 holes punched at its bottom to render it useless and stored separately as Scheduled Waste, SW409 for disposal in accordance with legal requirements. They were collected by authorized vendor, that is, OLST Petro Chemical Sdn Bhd, a Kualiti Alam registered contractor with DOE. Please refer to indicator 7.3.2 for details of disposal.</p>	Complied																				
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>No aerial spraying was carried out at both Pamol Timur and Unijaya estates.</p>	Complied																				
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Annual medical surveillance conducted as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date tested</th> <th>No. of Pesticides Operators</th> <th>Test results</th> <th>DOSH - OHD registration no.</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Pamol Timur</td> <td>15.7.2019</td> <td>9</td> <td rowspan="6">All Fit To Work</td> <td rowspan="6">HQ/08/DOC/00/597</td> </tr> <tr> <td>2.9.2019</td> <td>7</td> </tr> <tr> <td>23.9.2109</td> <td>4</td> </tr> <tr> <td>26.9.2019</td> <td>10</td> </tr> <tr> <td>20.11.2019</td> <td>4</td> </tr> <tr> <td>13.12.2019</td> <td>3</td> </tr> </tbody> </table>	Estate	Date tested	No. of Pesticides Operators	Test results	DOSH - OHD registration no.	Pamol Timur	15.7.2019	9	All Fit To Work	HQ/08/DOC/00/597	2.9.2019	7	23.9.2109	4	26.9.2019	10	20.11.2019	4	13.12.2019	3	Complied
Estate	Date tested	No. of Pesticides Operators	Test results	DOSH - OHD registration no.																			
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		Unijaya	Group 1 - 5-6.3.2020 Group 2 - 14.9.2020	9 9	All Fit To Work	HQ/08/DOC/00 /468
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	No female Pesticides sprayers nor under age of 18 as sighted in Employees Register were employed at Pamol Timur Estate and Unijaya Estate.			Complied	
<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.						
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>OUs sampled has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2020 and were available for review. In the management plan stated the identification of waste products/pollutants, waste generation, action plan and monitoring, documents to be reviewed, management review, comments and time bound and person in charge. The management plan covers all the operations and works station in the mill and estates</p> <p>Sighted the implementation of the management plan as follows:</p> <p>Pamol POM</p> <ol style="list-style-type: none"> <li>The estate report the schedule waste inventory to DOE through ESWISS on monthly basis. Sighted the inventory records for the month of September, October and November 2020.</li> </ol>			Complied	



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- 2. The mill use the the fibre and shell as renewable energy for boiler fuel. Sighted the monitoring records of fibre and shell usage FY 2020 as todote October 2020.
- 3. EFB were disposed through field application at sister estate. Sighted the EFB disposal records as follows:

Month	Weight (tons)
July 2020	1536.19
September 2020	823.65
October 2020	1359.52

**Pamol Timur Estate**

- 1. The estate report the schedule waste inventory to DOE through ESWISS on monthly basis. Sighted the inventory records for the month of February, March, April, May, June and July 2020.
- 2. The estate maintain the records of empty fertilizer bags in log book. Sighted the records FY 2019 and 2020. The empty fertilizer bags were reuse for estate/research centre operation or disposed through recycle contractors. Sighted the latest disposal records on 14/5/2019 as per invoice no. SII/PTE00001/05/2019 for 3570 kg of empty fertiliser bags.
- 3. The estate maintain the records of recycle waste disposed to recycle contractors.

<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -</p>	<p>The estate have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>Sighted the disposal records as follows:</p> <p>Pamol POM</p> <p>a. Scheduled waste</p> <ol style="list-style-type: none"> <li>1. SW 409, C/N no. 202007201191V47H dated 20/7/2020</li> <li>2. SW 312, C/N no. 20200720119UTEBS dated 20/7/2020</li> <li>3. SW 109, C/N no. 2020072011A9B6PI dated 20/7/2020</li> <li>4. SW 305, C/N no. 20200720119A9VB0L dated 20/7/2020</li> <li>5. SW 306, C/N no. 2020072011VCUQ9T dated 20/7/2020</li> <li>SW 429, C/N no. 2020072011ZY89OQ dated 20/7/2020</li> </ol> <p>Pamol Timur Estate</p> <p>a. Scheduled Waste</p> <ol style="list-style-type: none"> <li>1. SW 305, C/N no. 2020072816K7AEY5 dated 28/7/2020</li> <li>2. SW 306, C/N no. 2020072816ORT5HF dated 28/7/2020</li> <li>3. SW 312, C/N no. 2020072816PJK94S dated 28/7/2020</li> <li>4. SW 404, C/N no. 2020072411HS8MUQ dated 28/7/2020</li> <li>5. SW 409, C/N no. 2020072817DNIA3J dated 28/7/2020</li> <li>6. SW 410, C/N no. 202007291570WFG5 dated 28/7/2020</li> <li>7. SW 410, C/N no. 2020072915FQLR31 dated 28/7/2020</li> </ol> <p>b. Recycle Waste</p>	<p>Complied</p>
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		<p>The estate maintain the records of recycle waste disposed to recycle contractors. Sighted the disposal records as follows:</p> <ol style="list-style-type: none"> <li>1. Cash bill no. 243636 dated 6/11/2020</li> <li>2. Cash bill no 327560 dated 19/11/2019</li> <li>3. Cash bill no 327536 dated 23/7/2019</li> </ol> <p>Unijaya Estate          Scheduled Waste</p> <ol style="list-style-type: none"> <li>1. SW 305, C/N no. 2020111174JF5E7 dated 4/11/2020</li> <li>2. SW 305, C/N no. 20517 dated 25/8/2020</li> <li>3. SW 409, C/N no. 202011117BN8ZDA dated 4/11/2020</li> <li>4. SW 409, C/N no. 20518 dated 25/8/2020</li> </ol>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.          - Minor compliance -</p>	<p>There was no evidence of fire used for waste disposal in all estates visited.</p> <p>Domestic waste were collected every 2 days and dumped at domestic waste collection bin before being collected by appointed contractors and disposed in municipal landfill. Sighted the records of disposal for the month August and September 2020 as follows:</p> <p>Pamol Timur Estate</p> <ol style="list-style-type: none"> <li>1. Weighbridge ticket no. P11648 dated 12/9/2020</li> <li>2. Weighbridge ticket no. P12680 dated 29/9/2020</li> <li>3. Weighbridge ticket no. P9887 dated 14/8/2020</li> <li>4. Weighbridge ticket no. P11119 dated 26/8/2020</li> </ol> <p>Unijaya Estate</p>	Complied

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		<ol style="list-style-type: none"> <li>1. Weighbridge ticket no. P14262 dated 24/10/2020</li> <li>2. Weighbridge ticket no. P13538 dated 13/10/2020</li> <li>3. Weighbridge ticket no. P11847 dated 8/9/2020</li> </ol>	
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Good agriculture practices from the Group Standard Operating Procedures (StOPs), Section 4.0 Soil Conservation and Terracing, Section 5.0 Establishment and Maintenance of Legume Covers, Section 8.0: Manuring and Section 15.0 Foliar sampling were followed to manage soil fertility to ensure optimal and sustained yield and to minimize environmental impacts.</p> <p>Fertiliser application were made through recommendation by the Agronomist. Soil fertility was maintained as per the SOPs through the management been managed by recycling of biomass like frond stacking, water management in low lying areas, maintenance of soft weeds, leguminous cover crops, and <i>Nephrolepis biserrata</i> in the interline and terrace areas. Beside the use of inorganic fertilizer as per annual fertilizer application program, organic fertilizer too in the form of POME and EFB is applied as per recommendation by Agronomist from IOI Research Centre.</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Tissue/foliar sampling and soil sampling was conducted on annually basis. The result was documented in Oil Palm Fertiliser Recommendation.</p> <p>Latest foliar and soil sampling for Palong Timur Estate was conducted on 15/4/2020 till 7/5/2020.</p> <p>Latest foliar and soil sampling for Unijaya Estate was conducted on 17/2/2020 till 22/2/2020.</p>	Complied

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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. The strategy was guided by Standard Operation Procedure (StOP) for EFB mulching and POME application with latest review done in March 2020</p> <p>Sighted the sampled implementation of the nutrient recycling strategy as follows:</p> <p>EFB application was done as per program established with recommendation by agronomist at 40 tons per hectare. Sighted the application records as per EFB Application program (July 2020 – June 2021) as follows:</p> <table border="1" data-bbox="1137 751 1930 1002"> <thead> <tr> <th></th> <th>Pamol Timur Estate</th> <th>Unijaya Estate</th> </tr> </thead> <tbody> <tr> <td>Jul 2020</td> <td>788.20</td> <td>240.00</td> </tr> <tr> <td>Aug 2020</td> <td>19.27</td> <td>85.00</td> </tr> <tr> <td>Sep 2020</td> <td>0.00</td> <td>85.00</td> </tr> <tr> <td>Oct 2020</td> <td>884.64</td> <td>319.00</td> </tr> </tbody> </table>		Pamol Timur Estate	Unijaya Estate	Jul 2020	788.20	240.00	Aug 2020	19.27	85.00	Sep 2020	0.00	85.00	Oct 2020	884.64	319.00	Complied
	Pamol Timur Estate	Unijaya Estate																
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program is based on the recommendation by IOI Research Centre and documented in Fertilizer Recommendation Report. Observed the recommendation and implementation record for FY 2020:</p> <p>Pamol Timur Estate</p> <table border="1" data-bbox="1137 1238 1930 1393"> <tbody> <tr> <td>Month program: Sep 2020 Field: P02C Ha program: 40 ha Type: RP Rate/palm: 2.50 kg/palm</td> <td>Month program: Oct 2020 Field: P99C Ha program: 41 ha Type: NK Mixture (AS) Rate/palm: 1.50 kg/palm</td> </tr> </tbody> </table>	Month program: Sep 2020 Field: P02C Ha program: 40 ha Type: RP Rate/palm: 2.50 kg/palm	Month program: Oct 2020 Field: P99C Ha program: 41 ha Type: NK Mixture (AS) Rate/palm: 1.50 kg/palm	Complied													
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		<table border="1"> <tr> <td>Date applied: 27 – 28/8/2020</td> <td>Date applied: 3 – 5/11/2020</td> </tr> <tr> <td colspan="2">Unijaya Estate</td> </tr> <tr> <td>           Month program: July 2020            Field: PM 07C            Ha program: 39 ha            Type: NK Mixture (AS)            Rate/palm: 2.25            Date applied: 21 – 22/7/2020         </td> <td>           Month program: March 2020            Field: PM 16C            Ha program: 75            Type: Borate            Rate/palm: 0.10            Date applied: 23 – 24/7/2020         </td> </tr> </table>	Date applied: 27 – 28/8/2020	Date applied: 3 – 5/11/2020	Unijaya Estate		Month program: July 2020 Field: PM 07C Ha program: 39 ha Type: NK Mixture (AS) Rate/palm: 2.25 Date applied: 21 – 22/7/2020	Month program: March 2020 Field: PM 16C Ha program: 75 Type: Borate Rate/palm: 0.10 Date applied: 23 – 24/7/2020	
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<p><b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.</p>									
<p>7.5.1</p>	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.          - Critical (Major) compliance -</p>	<p>Soil series map were available for all estates visited prepared by the IOI Research Centre. Soil Identified as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Pamol Timur Estate</td> <td>Asahan 0.43%, Batang Merbau 2.27%, Batu Anam 1.40%, Batu Lapan 0.50%, Beserah 2.29%, Bungor 26.48%, Gajah Mati 7.67%, Gong Chenak 26.63%, Jempol 0.69%, Jitra 0.51%, Katong 0.40%, Kerayong 1.38%, Kuala Brang 2.51%, Lunas 0.08%, Munchong 0.25%, Musang 0.90%, Pohoi 0.43%, Rengam 8.56%, Sentol 3.62%, Tai Tak 8.47%, Tawar 1.27%, Tebok 2.34%, Terap 0.41%, Ulu Dong 0.51%</td> </tr> <tr> <td>Unijaya Estate</td> <td>Malacca 2.05%, Colluvium 2.27% Rengam 60.45%, Durian 12.02%, Gajah mati 13.58%, Lating 5.11%, Local Alluvium 3.46%, Batu lapan 0.545, Kuah 0.53%</td> </tr> </tbody> </table>	Estate	Soil Series	Pamol Timur Estate	Asahan 0.43%, Batang Merbau 2.27%, Batu Anam 1.40%, Batu Lapan 0.50%, Beserah 2.29%, Bungor 26.48%, Gajah Mati 7.67%, Gong Chenak 26.63%, Jempol 0.69%, Jitra 0.51%, Katong 0.40%, Kerayong 1.38%, Kuala Brang 2.51%, Lunas 0.08%, Munchong 0.25%, Musang 0.90%, Pohoi 0.43%, Rengam 8.56%, Sentol 3.62%, Tai Tak 8.47%, Tawar 1.27%, Tebok 2.34%, Terap 0.41%, Ulu Dong 0.51%	Unijaya Estate	Malacca 2.05%, Colluvium 2.27% Rengam 60.45%, Durian 12.02%, Gajah mati 13.58%, Lating 5.11%, Local Alluvium 3.46%, Batu lapan 0.545, Kuah 0.53%	<p>Complied</p>
Estate	Soil Series								
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Addressed in StOP for land Preparation for New Planting and Re-Planting, refer document no. IOI/SOP/A/05 issue date 2007 revision March 2020 under section 6.5: Construction of new Roads: Hilly to steep terrain (<math>\leq 25^\circ</math> slope) stated as follows:          "No planting/terracing shall be carried out at very steep terrains (<math>\geq 25^\circ</math> slope)".</p>	Complied			
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting conducted at all estates visited.</p>	Complied			
<p><b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>						
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series map were available for all estates visited prepared by the IOI Research centre. No fragile soils identified in all estates in Pamol Kluang Region.</p> <p>As sighted in estates visited, the estates have taken into account the land terrain, drainage and road systems in planning the 2020 replanting.</p>	Complied			
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Addressed in StOP for land Preparation for Management of Oil Palm on Peatland Replanting, refer document no. IOI/SOP/A/03 issue date 2007 revision March 2020.</p>	Complied			
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>IOI Research Centre conducted assessment and provided the estates with topography maps. Sampled topography information at estates visited as follows:</p> <table border="1" data-bbox="1137 1337 1792 1385"> <tr> <td data-bbox="1137 1337 1355 1385"></td> <td data-bbox="1355 1337 1572 1385">Pamol Timur</td> <td data-bbox="1572 1337 1792 1385">Unijaya</td> </tr> </table>		Pamol Timur	Unijaya	Complied
	Pamol Timur	Unijaya				

		<table border="1"> <tr> <td>0° - 2°</td> <td>19.68</td> <td>18.68</td> </tr> <tr> <td>2° - 6°</td> <td>57.06</td> <td>63.51</td> </tr> <tr> <td>6° - 12°</td> <td>20.9</td> <td>17.18</td> </tr> <tr> <td>12° - 15°</td> <td>1.55</td> <td>0.56</td> </tr> <tr> <td>15° - 25°</td> <td>0.81</td> <td>0.07</td> </tr> <tr> <td>≥25°</td> <td>0.00</td> <td>0.00</td> </tr> </table>	0° - 2°	19.68	18.68	2° - 6°	57.06	63.51	6° - 12°	20.9	17.18	12° - 15°	1.55	0.56	15° - 25°	0.81	0.07	≥25°	0.00	0.00	
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<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.																					
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.	Complied																		
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.	Complied																		
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.	Complied																		
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.	Complied																		



7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.	Complied
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.	Complied
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.	Complied

**Criterion 7.8:** Practices maintain the quality and availability of surface and groundwater.

<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <ul style="list-style-type: none"> <li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li> <li>b) Workers have adequate access to clean water.</li> </ul> <p>- Minor compliance -</p>	<p>The certification unit visited has assess the water usage demand and source of supply for the operation including the domestic usage by the community within the operating centre.</p> <p>The management plan was developed to ensure the outgoing water does not have negative impacts into natural waterways, to promote ways to optimize water usage and to protect natural water course.</p> <p>Pamol POM</p> <p>Latest water management plan dated 13/10/2020 was reviewed. Among the management plan covers:</p> <ul style="list-style-type: none"> <li>1. Water conservation plan:             <ul style="list-style-type: none"> <li>1.1. Buffer zone</li> </ul> </li> <li>2. POME management</li> </ul> <p>Clean treated water is supplied via pipe (SAJ) free of charge to workers by the Pamol Kluang POM to its workers and workers of Pamol Timur Estate</p> <p>Unijaya Estate</p> <p>Latest water management plan dated 3/11/2020 was reviewed. Among the management plan covers:</p> <ul style="list-style-type: none"> <li>1. Water conservation plan             <ul style="list-style-type: none"> <li>1.1. Buffer/riparian zone</li> </ul> </li> <li>2. Soil moisture conservation plan             <ul style="list-style-type: none"> <li>2.1. Pruned fronds</li> <li>2.2. Empty fruit bunch mulching</li> <li>2.3. Shell</li> </ul> </li> </ul>	<p>Complied</p>
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		<p>2.4. Construction of water conservation terraces and planting terraces</p> <p>2.5. Moisture conservation pit (silt pit)</p> <p>Sighted the implementation as follows:</p> <p>3. Silt pit were constructed along the field road to conserve water as sighted in in field PR15B.</p> <p>4. Water conservation terrace and planting terrace were constructed as sighted in replanting area of PR19.</p> <p>The estate provided clean and treated water supply to all the workers through water treatment plan.</p>													
<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. 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="1137 911 1926 1211"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 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>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The estates visited conducted river water analysis once a year to monitor the river water quality to ensure the estates activity didn't pollute the river water. Sighted the river water sampling result as follows:</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	<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														

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		<p>Unijaya          Latest river water sampling were conducted on 29/10/2020. However, the result has yet to be received by the estate.</p>																			
<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.          - Minor compliance -</p>	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Sighted the Quarterly Return Form to DOE FY 2020 as follows:          3<sup>rd</sup> quarter</p> <table border="1" data-bbox="1256 671 1809 1173"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Jul 13/7/2020</td> <td>BOD</td> <td>1670</td> </tr> <tr> <td>pH</td> <td>5.10</td> </tr> <tr> <td rowspan="2">Aug 5/8/2020</td> <td>BOD</td> <td>1740</td> </tr> <tr> <td>pH</td> <td>5.10</td> </tr> <tr> <td rowspan="2">Mar 8/9/2020</td> <td>BOD</td> <td>6540</td> </tr> <tr> <td>pH</td> <td>7.30</td> </tr> </tbody> </table>	Month	Parameter	Results	Jul 13/7/2020	BOD	1670	pH	5.10	Aug 5/8/2020	BOD	1740	pH	5.10	Mar 8/9/2020	BOD	6540	pH	7.30	<p>Complied</p>
Month	Parameter	Results																			
Jul 13/7/2020	BOD	1670																			
	pH	5.10																			
Aug 5/8/2020	BOD	1740																			
	pH	5.10																			
Mar 8/9/2020	BOD	6540																			
	pH	7.30																			
<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded.          - Minor compliance -</p>	<p>The mill monitors the water consumption/CPO on monthly basis. sighted the records FY 2019 and 2020 as todate October 2020 as follows:</p> <table border="1" data-bbox="1137 1303 1626 1367"> <thead> <tr> <th>Month</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Month	2019	2020				<p>Complied</p>												
Month	2019	2020																			

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	Jan	3.65	3.55
	Feb	3.80	3.86
	Mar	4.03	4.82
	Apr	3.90	3.93
	May	4.07	4.14
	Jun	4.22	5.34
	Jul	3.84	4.64
	Aug	3.06	N/A
	Sep	3.36	N/A
	Oct	3.54	8.44
	Nov	3.69	
	Dec	3.55	
	Average	3.95	5.26

**Criterion 7.9:** Efficiency of fossil fuel use and the use of renewable energy is optimised

<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>Plan to reduce the usage of the non-renewable energy has been established by using renewable energy such as shell and kernel as fuel for boiler to reduce the usage of diesel.</p> <p>The mill monitored the consumption of diesel usage on monthly basis. The data monitoring was available for review at the mill and documented in the PalmGHG report.</p> <p>Renewable energy used is from biofuel, shell and EFB/fibre for boiler start-up. Sighted the sampled records of renewable energy usage for FY 2019 and FY 2020 as todate October as follows:</p> <table border="1" data-bbox="1137 722 1774 1375"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">Fibre/Shell</th> <th colspan="2">Diesel</th> </tr> <tr> <th>2019</th> <th>2020</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td></td> <td>0.73</td> <td>0.85</td> <td>0.99</td> </tr> <tr> <td>Feb</td> <td></td> <td>0.73</td> <td>0.92</td> <td>1.09</td> </tr> <tr> <td>Mar</td> <td></td> <td>0.71</td> <td>0.86</td> <td>0.85</td> </tr> <tr> <td>Apr</td> <td></td> <td>0.74</td> <td>1.06</td> <td>1.14</td> </tr> <tr> <td>May</td> <td></td> <td>0.75</td> <td>1.01</td> <td>1.25</td> </tr> <tr> <td>Jun</td> <td></td> <td>0.76</td> <td>1.03</td> <td>1.66</td> </tr> <tr> <td>Jul</td> <td></td> <td>0.75</td> <td>1.17</td> <td>1.76</td> </tr> <tr> <td>Aug</td> <td></td> <td></td> <td>0.62</td> <td></td> </tr> </tbody> </table>	Month	Fibre/Shell		Diesel		2019	2020	2019	2020	Jan		0.73	0.85	0.99	Feb		0.73	0.92	1.09	Mar		0.71	0.86	0.85	Apr		0.74	1.06	1.14	May		0.75	1.01	1.25	Jun		0.76	1.03	1.66	Jul		0.75	1.17	1.76	Aug			0.62		<p>Complied</p>
Month	Fibre/Shell			Diesel																																																
	2019	2020	2019	2020																																																
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Aug			0.62																																																	

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Sep			1.26	
Oct		0.76	0.99	2.15
Nov			1.00	
Dec			1.35	
Average			1.00	

Stated in the continuous management plan, the mill plan to install new gas burner directly link to boiler for combustion purpose to reduce the fuel usage.

The estates visited monitor the diesel consumption of diesel on monthly basis. Sighted the monitoring records L/FFB as follows:

Month	Pamol Timur		Unijaya	
	2019	2020	2019	2020
Jan	0.87	1.00	0.80	1.30
Feb	0.82	0.84	0.75	1.07
Mar	0.81	0.54	0.93	0.80
Apr	0.74	0.64	0.86	0.87
May	0.84	0.67	0.62	0.70

		Jun	0.69	0.66	0.69	0.60		
		Jul	0.72	0.78	0.90	0.46		
		Aug	0.67	0.59	0.72	0.66		
		Sep	0.61	0.57	0.71	0.67		
		Oct	0.54	0.68	0.70	0.67		
		Nov	0.93		1.78			
		Dec	0.91		0.87			
		Average	0.75		0.80			

**Criterion 7.10:** Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p>	Complied
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7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>No development within Pamol Kluang Region Certification Unit since 2014.</p>	<p>Complied</p>
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Significant pollutants identification and plans are documented under Pollution Environmental Management Plan FY 2020. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>Sighted the sampled implementation of the management plan as follows:</p> <p>1. The mill conducted Stack sampling as per requirement stated in the compliance schedule for DOE license and contradiction license. Sighted the sample stack sampling as follows:</p> <ul style="list-style-type: none"> <li>• 2nd Quarter 2019            Report no: AEMR(J)/19-12/17            Monitoring date: 28/6/2019            Result: 65.31 at 12% CO2, not exceed permissible limit at 150 mg/m3.</li> <li>• 4<sup>th</sup> Quarter 2019            Report no: AEMR(J)/19-12/17            Monitoring date: 27/12/2019            Result: 45.89 at 12% CO2, not exceed permissible limit at 150 mg/m3.</li> <li>• 1<sup>st</sup> Quarter 2020            Report no: AEMR(J)/20-02/10</li> </ul>	<p>Complied</p>

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		Monitoring date: 14/2/2020 Result: 42.59 at 12% CO2, not exceed permissible limit at 150 mg/m3.	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There was no new planting within the CU noted. Where replanting was implemented at Pamol Timur Estate, Block 20A and at Unijaya Estate Block PR 2019, site visit did not sight any evidence of burn marks on the ground. Crops were fell, mowed, chipped, pulverised and left to decay as recycled nutrient. This practice was in accordance with Guideline on Group's Long Term Replanting Planning [A/016-05/2018, dated 20/6/2018]. The estate management personnel understood the requirements of zero burning.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	The Pamol Timur Estate and Unijaya Estate had established and identified in its Emergency Response Plan Procedure credible scenario that has potential to occur include Fire outbreak and Fire in own field or neighbouring estate as mentioned in indicator 6.7.2 above. Water bowser and portable firewater pump is available.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Plan to engage adjacent stakeholders on fire prevention and control measures has been considered, perhaps before year end when Covid-19 pandemic subsides.	Complied
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			

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7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new land clearing since 2005 at Pamol Timur Estate and Unijaya Estate visited. At Unijaya Estate conversion from Rubber to Oil Palm planting ended in 1998</p>	Complied
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b>  Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>There was no new land clearing sighted in the sampled estate.</p>	Complied
7.12.3	<p><i>Indicator is not applicable in Malaysia context</i></p>	<p>Not applicable</p>	Not Applicable
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in</p>	<p>There was no presence of peat land or other conservation area have been identified in the sampled estates.</p>	Complied

	<p>consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>		
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There was no presence of peat land or other conservation area have been identified in the sampled estates.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>At the time of audit, the review to update the 2009 HCV Assessment report produced Joshua Matthews and team is being undertaken jointly by the Sustainability Team, Estate Management and the IOI Geographical Information System Department.</p> <p>Monitoring results showed the Pamol Timur Estate continued to note the non-existent of RTE species. However, seasonally elephant intrusion occurred as the estate is situated nearby Kluang Forest Reserve and Endau-Kluang Forest Reserve. The Estate Management Action Plan to handle this situation is reflected in it Environmental Management Plan dated 16/3/2020 on the protection of HCV areas. There is no RTE sighted at Unijaya Estate. HCV Awareness training have been conducted at Pamol Timur Estate on 8 &amp; 9 October 2020.</p> <p>Field visits at Pamol Timur Estate and Unijaya Estate confirmed there is no RTE species in the area. Likewise, sighting of monitoring record dated 10/04/2020 showed same. The signage discouraging</p>	Complied

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		any illegal or inappropriate hunting, fishing or collecting activities available verified during site visit.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	No new planting and land clearing since 15 November 2018.	Complied
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	No new planting and land clearing since 15 November 2018.	Complied

**Appendix B: Approved Time Bound Plan**

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakan, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	ASA-04 audit completed in July 2020	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2020	Recertification audit completed in November 2019.	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Apr 2020	Recertification audit completed in November 2019	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, and Jasin Lalang	Aug 2009	Re-Certified in Oct 2020	Recertification audit completed in July 2020	No outstanding issues
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2020	Recertification audit completed in August 2020	No outstanding issues
6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	Recertification audit completed in September 2020	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	Recertification audit completed in August 2020	No outstanding issues
8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	ASA-04 audit completed in March 2020	No outstanding issues
9.	Leepang (Sabah) POM	Morisem 5, Leepang 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Re-certified in December 2018	ASA-02 audit completed in September 2020	No outstanding issues.

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
10.	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Re-certified in Mar 2018	ASA-02 audit completed in January 2020.	No outstanding issues
11.	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and Bimbingan 2	Oct 2012	Re-certified in July 2018	ASA-02 audit completed in January 2020.	No outstanding issues
12.	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang 2, Leepang 3, and Leepang 4	Sept 2013	Re-certified in December 2018	ASA-01 audit completed in September 2019	No outstanding issues
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 (Outgrowers & Smallholders)	Planned - 2018	Certified in July 2018	ASA-02 audit completed in July 2020.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
14.	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 17 (Outgrowers & Smallholders)	Dec 2017	Certified in May 2018	ASA-02 audit completed in February 2020.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
15.	<b>IOI – Pelita, Sarawak</b>	Sejap and Tegai	<b>Planned – TBC as it is under the resolution process</b>	<b>Uncertified Unit</b>	IOI – Pelita (Sarawak) is in the resolution process (under RSPO CP)	<p><b>Progress on Stage 2: Community Participatory Mapping</b></p> <p>Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping, started in August 2019. Technical assistance to the affected communities is being provided by CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point, the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.</p> <p>On 12 June 2020, CICOM resumed the Community Participatory Mapping process.</p> <p>Two of the remaining three communities yet to be mapped, Long Jegan and Long Teran Batu, had some reservations about their participation in the Community Participatory Mapping. To address their concerns, a team consisting of the State of Sarawak’s Ministry of Modernization of Agriculture, Native Land and Regional Development (MANRED), Land Custody and Development Authority (LCDA), District Office of Beluru, and IOI visited the two communities on July 20-21. As a result, Long Jegan and Long Teran Batu decided to</p>



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						<p>participate in the mapping exercise. The mapping of these two villages was completed on 29 July 2020.</p> <p>On 21 July 2020, the Penans of Long Lapok, which is another local community living outside the Provisional Lease area, submitted to IOI a request to include them in the Resolution Process. CICOM will, therefore, include this community in the mapping exercise to understand their land claims better. This will inevitably delay further the completion of the Community Participatory Mapping.</p> <p>CICOM managed to complete the initial mapping exercise in line with the deadline of 31 July 2020. However, when CICOM proceeded to socialization and verification of the maps with the affected communities, a group of 48 LTKA farmers suddenly came up with new land claims, which required CICOM to conduct further land surveys and thus delayed the process of the Community Participatory Mapping.</p> <p>On August 7th, the Berawan of Long Jegan sent a letter to the RSPO expressing their dissatisfaction with IOI Pelita and CICOM helping other communities with mapping their land claims without consultation with the leaders of Long Jegan who claim the entire area. IOI Pelita and the representatives of the State of Sarawak Government met on October 5th and obtained Long Jegan's consent to continue their participation in the mapping process and delay the addressing of the overlapping land claims till the next stage of the resolution process, that is till Stage 3 – Negotiations for Final Dispute Settlement. The local authorities made it also clear that the intercommunal land disputes between various communities are beyond the control or authority of IOI Pelita and instead should be directed to their District Officer. During the meeting the elders of Long Jegan asked IOI Pelita and CICOM for help with additional mapping exercises. This will unfortunately further delay the completion of Stage 2 (Community Participatory Mapping), which is now expected to be concluded sometime by mid-November 2020.</p>



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						<p>The screenshot displays the RSPO Roundtable on Sustainable Palm Oil Complaint System interface. At the top, it identifies the respondent as IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad) and the complainant as the Local Community of Long Teran Kanan &amp; NGO (Grassroots). A progress bar indicates the complaint's status. Below this, a 'COMPLAINT BACKGROUND' table provides key details:</p> <table border="1"> <tr> <td>Complaint Reference</td> <td>N/A</td> </tr> <tr> <td>Status</td> <td>Investigation</td> </tr> <tr> <td>Respondent</td> <td>IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)</td> </tr> <tr> <td>Complainant</td> <td>Local Community of Long Teran Kanan &amp; NGO (Grassroots)</td> </tr> <tr> <td>Date Complaints Submitted</td> <td>15 Mar 2010</td> </tr> <tr> <td>Date Complaints Accepted</td> <td>N/A</td> </tr> <tr> <td>Membership Sector</td> <td>Processors and / or Traders</td> </tr> <tr> <td>Location of Complaint</td> <td>Malaysia</td> </tr> <tr> <td>Region / District / Province</td> <td>Miri, Sarawak</td> </tr> <tr> <td>Summary of the Complaint</td> <td> <p><b>Synopsis</b></p> <p>Land conflict</p> <p>IOI Group's certification process for new certifications suspended in 1/4/11. Both parties have agreed for mediation. Mediator has been engaged through the RSPO Dispute Settlement Facility. Mediation process Stage 1 began in September 2011 and is on-going (Note: Stage 1 is about Conflict assessment and Agreement to Participate in a Mediation. This stage would map the dispute through identifying the parties who should participate in the mediation and establish a primary agenda of issues that require resolution. It would also seek the commitment of the key parties to enter into a mediation, and establish their agreement to the mediation team).</p> <p>Updates of this case can be found in DSF <a href="#">list of disputes</a>.</p> </td> </tr> </table>	Complaint Reference	N/A	Status	Investigation	Respondent	IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)	Complainant	Local Community of Long Teran Kanan & NGO (Grassroots)	Date Complaints Submitted	15 Mar 2010	Date Complaints Accepted	N/A	Membership Sector	Processors and / or Traders	Location of Complaint	Malaysia	Region / District / Province	Miri, Sarawak	Summary of the Complaint	<p><b>Synopsis</b></p> <p>Land conflict</p> <p>IOI Group's certification process for new certifications suspended in 1/4/11. Both parties have agreed for mediation. Mediator has been engaged through the RSPO Dispute Settlement Facility. Mediation process Stage 1 began in September 2011 and is on-going (Note: Stage 1 is about Conflict assessment and Agreement to Participate in a Mediation. This stage would map the dispute through identifying the parties who should participate in the mediation and establish a primary agenda of issues that require resolution. It would also seek the commitment of the key parties to enter into a mediation, and establish their agreement to the mediation team).</p> <p>Updates of this case can be found in DSF <a href="#">list of disputes</a>.</p>
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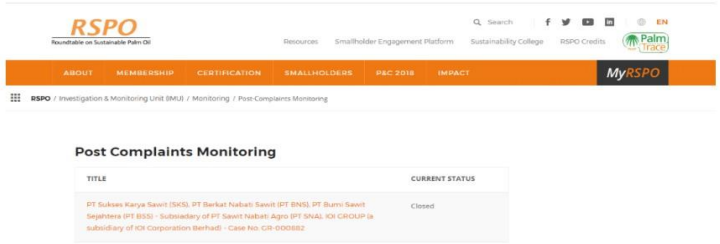
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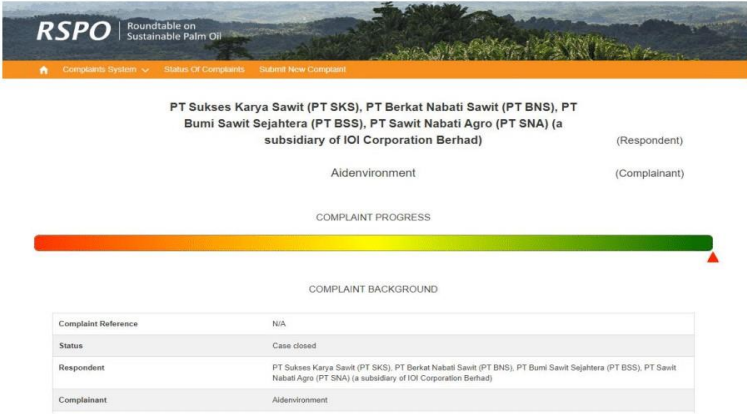
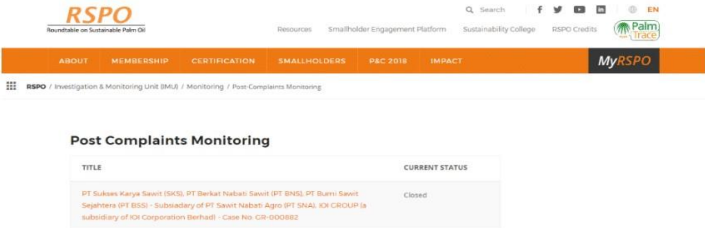
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17.	<b>PT BNS, Indonesia</b>	BNS 1, BNS 2, BNS 3 and BNS 4	<b>Planned - 2021</b>	<b>Uncertified Unit</b>	RSPO Stage 1 audit was conducted in September 2019	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15<sup>th</sup> April 2019, RSPO’s official announced “that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed.”</p> <p>IOI received an email from RSPO that "the Investigation &amp; Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel’s directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) <a href="#">RSPO Ketapang Complaint for PT BSS, PT SKS &amp; PT BNS</a></p>

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19.	PT KPAM, Indonesia	Under Development	Planned - 2023	Uncertified Unit	NPP and HCSA was approved in April 2018. Currently under development.	<p>RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:</p>  <p><a href="https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?">https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?</a></p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:</p> <p><a href="http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf">http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf</a></p>



**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in [2019] for [Pamol Kluang POM] and supply base was calculated using the PalmGHG Calculator version 4.0.1. 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 [2019] for [Pamol Kluang POM] and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	0.95	OER	24.16
PKO	0.95	KER	4.72

Production	t/yr	Land Use	Ha
FFB Process	243,922.49	OP Planted Area	10834
CPO Produced	5893	OP Planted on peat	0.00
PKO Produced	1150	Conservation (forested)	37.74
		Conservation (non-forested)	30.51
		<b>Total</b>	<b>10902.25</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	105334.24	0.43	0.00	0.00	0.00	0.00	105334.24	0.43
CO <sub>2</sub> Emission from fertilizer	14371.32	0.06	0.00	0.00	0.00	0.00	14371.32	0.06
NO <sub>2</sub> Emission	9587.97	0.04	0.00	0.00	0.00	0.00	9587.97	0.04
Fuel Consumption	1982.65	0.01	0.00	0.00	0.00	0.00	1982.65	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-99842.90	-0.41	0.00	0.00	0.00	0.00	-99842.90	-0.41
Conservation Sequestration	-346.08	-0.00	0.00	0.00	0.00	0.00	-346.08	-0.00

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<b>Total</b>	<b>31087.20</b>	<b>2.87</b>	0.00	0.00	0.00	0.00	<b>31087.20</b>	<b>2.87</b>
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\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	36180.05	0.15
Fuel Consumption	184.49	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>36364.55</b>	<b>0.15</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	70
Divert to methane captured (flaring) (%)	30
Divert to methane captured (energy generation) (%)	0.00

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	November 2019	21653.84	-	21653.84
2	December 2019	15580.72	-	15580.72
3	January 2020	15823.07	-	15823.07
4	February 2020	18333.43	-	18333.43
5	March 2020	20200.40	-	20200.40
6	April 2020	22490.91	-	22490.91
7	May 2020	24059.85	-	24059.85
8	June 2020	15614.80	-	15614.80
9	July 2020	13214.58	-	13214.58
10	August 2020	0.00	-	0.00
11	September 2020	0.00	-	0.00
12	October 2020	8058.89	-	8058.89
<b>TOTAL</b>		<b>175030.49</b>	<b>-</b>	<b>175030.49</b>
<b>Note:</b>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	November 2019	5152.53	1041.12
2	December 2019	3625.78	741.16
3	January 2020	3800.53	753.87
4	February 2020	4420.11	871.02
5	March 2020	4957.48	930.10
6	April 2020	5334.81	1055.27
7	May 2020	5612.90	1113.67
8	June 2020	3563.19	687.99
9	July 2020	2989.84	556.20
10	August 2020	0.00	0.00
11	September 2020	0.00	0.00
12	October 2020	1856.92	408.78

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	<b>Total</b>	41314.09	8159.18
<b>Note:</b>			

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
	IOI Commodity Trading Sdn Bhd	RSPO_PO1000003601	41230.03	8,020.98
<b>Total</b>			<b>41230.03</b>	<b>8,020.98</b>
<b>Note:</b>				

<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	N/A			
<b>Note:</b>				

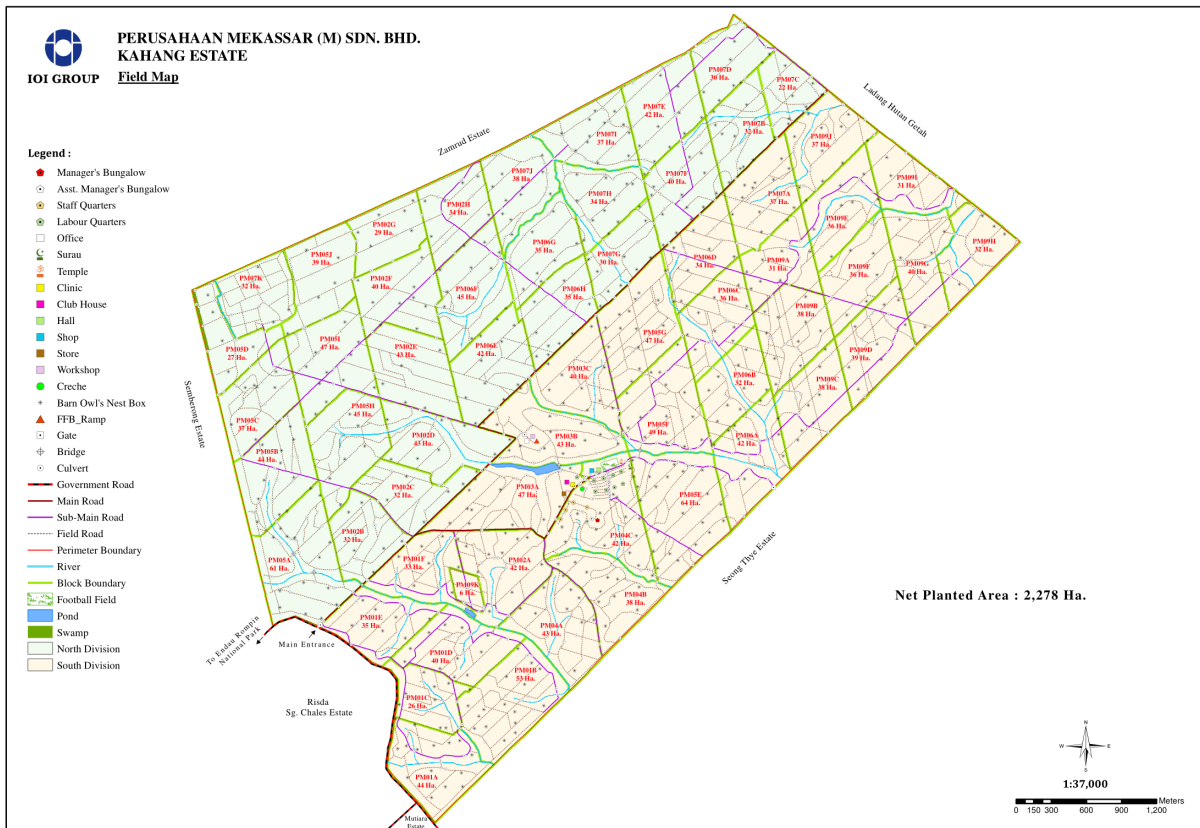
<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	CARGILL BV-TROPICAL REF OIL	48.65	0.00
<b>Total</b>		<b>48.65</b>	<b>0.00</b>
<b>Note:</b>			

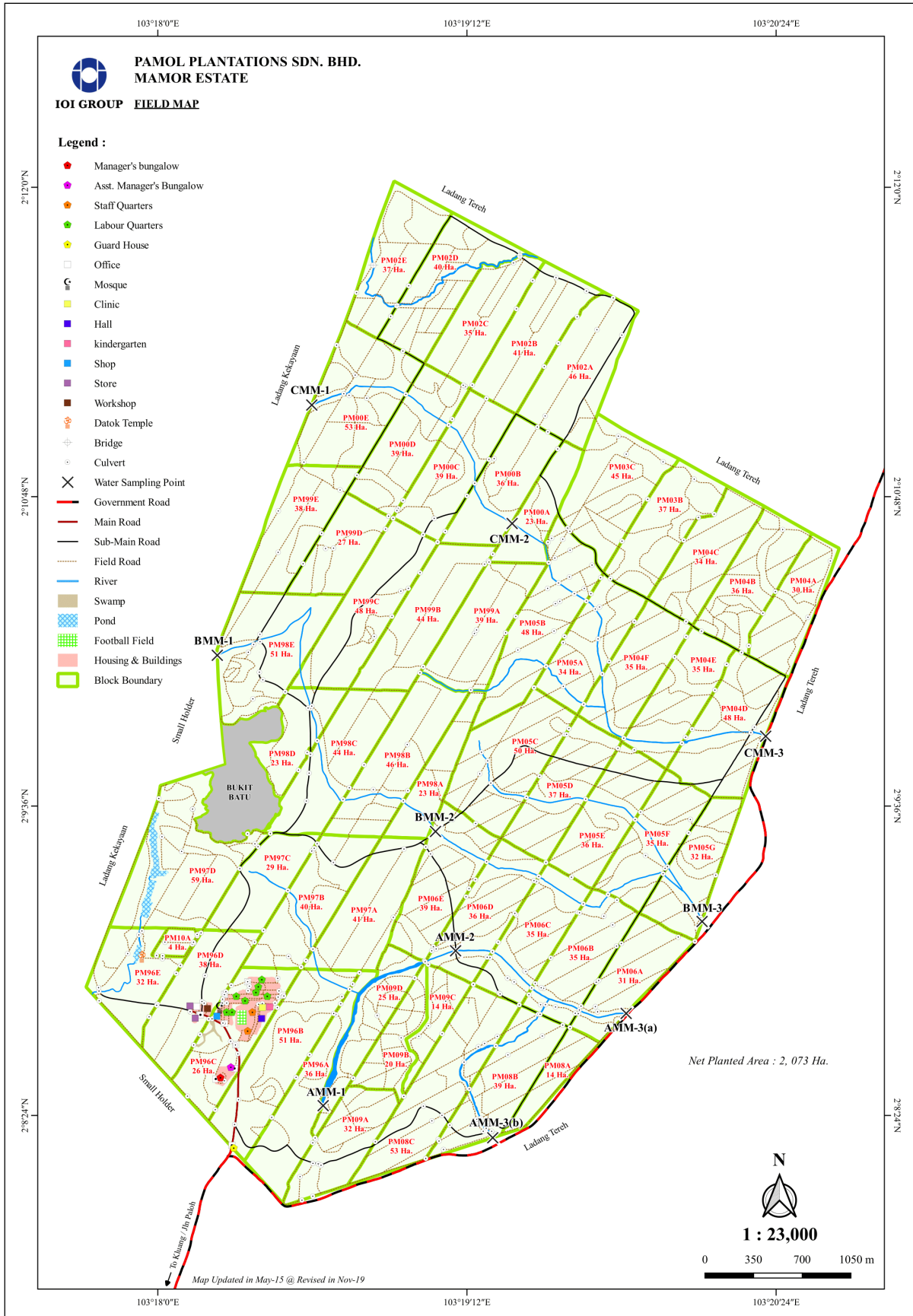
<b>F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	N/A		
<b>Note:</b>			

**Appendix E: Location Map of Certification Unit and Supply bases**



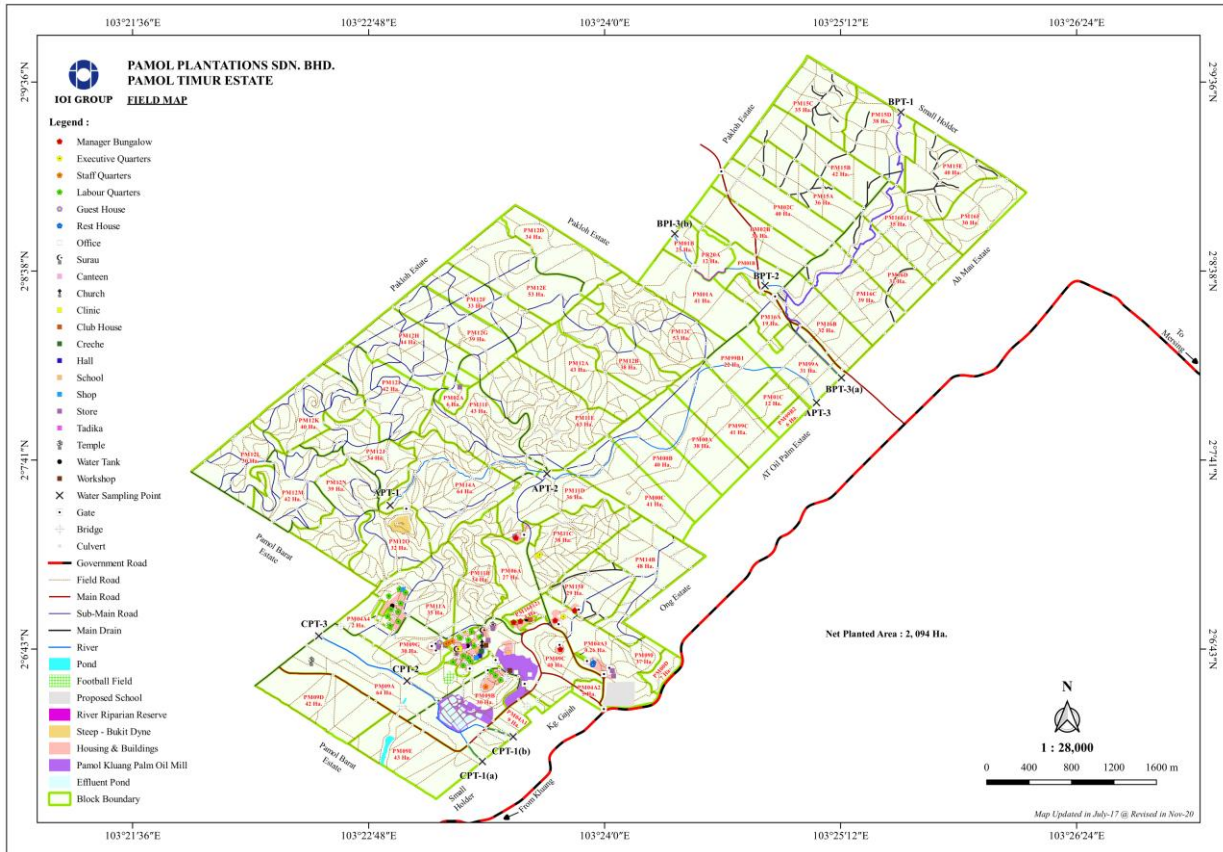
**Appendix F: Estate Field Map**



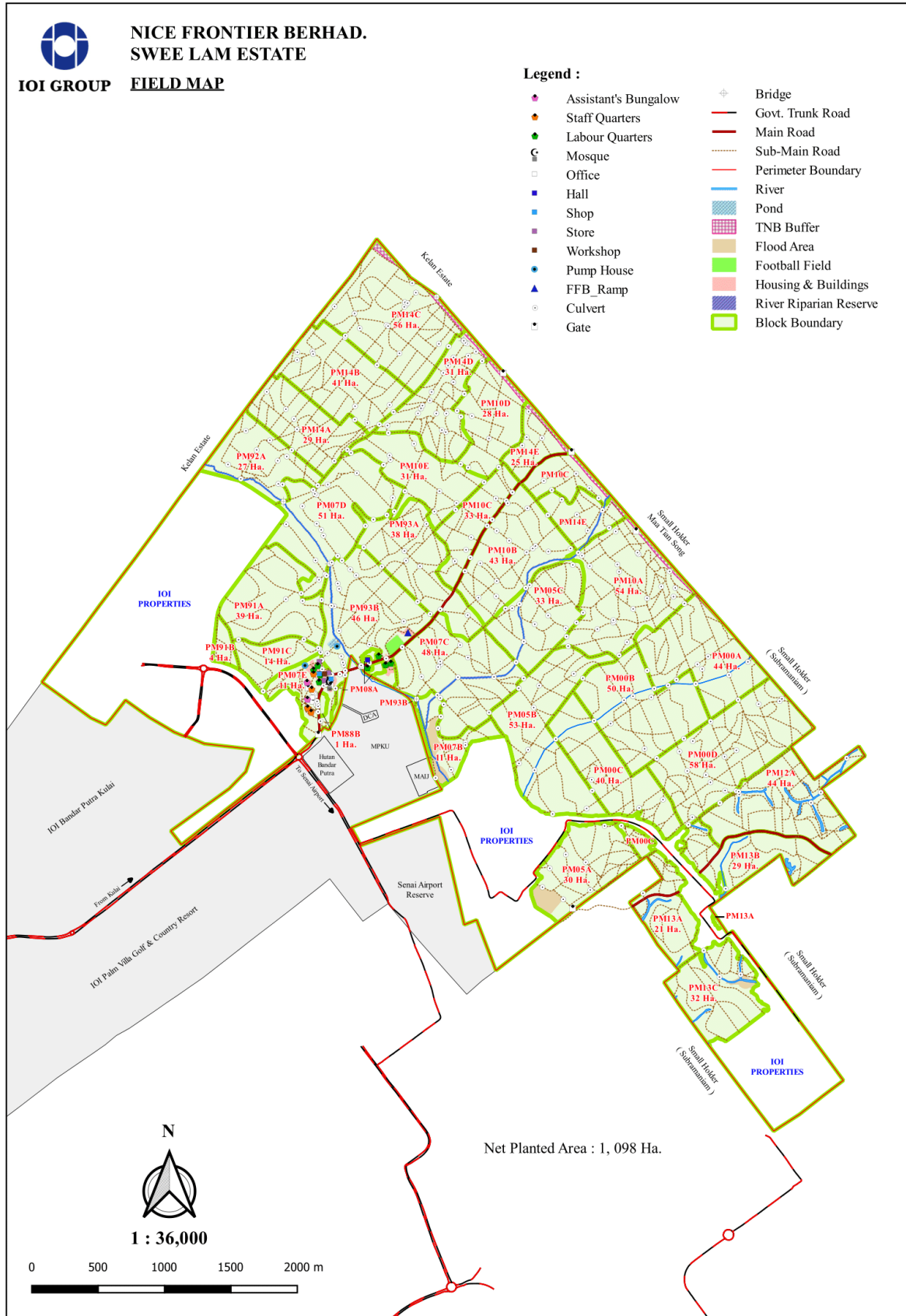




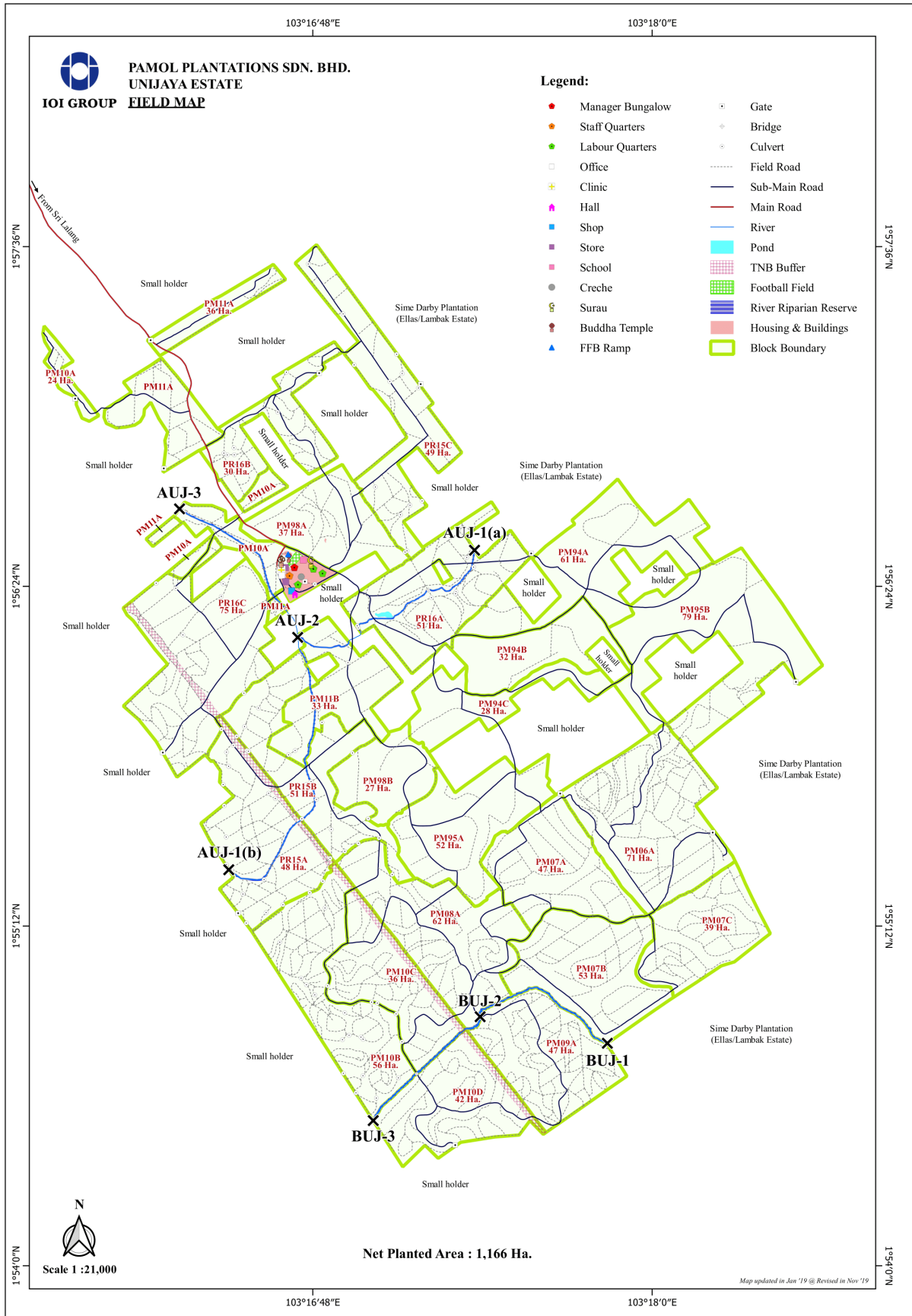
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Map Updated in Nov-18 @ Revised in Nov-19



**Appendix G: List of Smallholder Sampled**

*(If applicable – independent smallholder / scheme smallholder / outgrowers for group certification)*

## Appendix H: 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
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
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