

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2\_3)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

<b>Client Company Name / Parent Company:</b> <b>IOI Corporation Berhad</b>
Client Company / Parent Company Address: IOI City Tower 2, Lebuhr IRC, IOI Resort City 62502 Putrajaya, Malaysia
Certification Unit: <b>Pamol Plantations Sdn Bhd- Pamol Kluang Palm Oil Mill</b>
Location of Certification Unit: 8½ Mile, Mersing Road, Kluang, 86007 Johor, Malaysia.
Date of Final Report: 24/03/2023

**TABLE of CONTENTS**

**Page No**

Section 1: Scope of the Assessment.....	3
1. Company Details .....	3
2. Certification Information .....	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases .....	4
5. Description of Supply Base .....	5
6. Plantings & Cycle.....	5
7. Summary of Certified Tonnage of FFB (Own Certified Scope) .....	6
8. Summary of Certified Tonnage of FFB (from other certified unit(s)) .....	6
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	6
10. Summary of Certified Tonnage (not applicable for ISS) .....	7
11. Summary of Actual Volume sold .....	8
12. Independent Smallholders Certified Tonnage / Volume .....	9
13. Independent Smallholders Actual Sold Tonnage / Volume .....	10
Section 2: Assessment Process .....	11
2.1 Assessment Methodology, Programme, Site Visits.....	11
2.2 BSI Assessment Team .....	12
2.3 Assessment Plan.....	14
Section 3: Assessment Findings .....	17
3.1 Multiple Management Units and Time Bound Plan.....	17
3.2 Progress of scheme smallholders and/or outgrowers.....	19
3.3 Details of Nonconformities .....	26
3.3.1 Status of Nonconformities Previously Identified and Observations.....	32
3.3.2 Summary of the Nonconformities and Status .....	35
3.4 Stakeholders and previous land owner / user consultation.....	35
3.5 Impartiality and conflict of interest .....	37
Formal Signing-off of Assessment Conclusion and Recommendation .....	38
Appendix A: Summary of Findings .....	39
Appendix B: GHG Reporting Executive Summary .....	159
Appendix C: Location Map of Certification Unit and Supply bases.....	161
Appendix D: Estate Field Map.....	162
Appendix E: List of Smallholder Registered and/or sampled .....	168
Appendix F: List of Abbreviations.....	169

### Section 1: Scope of the 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>	IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia.		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Pamol Plantations Sdn Bhd - Pamol Kluang Palm Oil Mill		
<b>Location / Address</b>	8½ Mile, Mersing Road, Kluang, 86007 Johor, Malaysia.		
<b>Website</b>	<a href="http://www.ioigroup.com">www.ioigroup.com</a>		
<b>Management Representative</b>	William Siow Kar Dat (Senior Sustainability Manager, Plantation Division, IOI HQ)	<b>E-mail</b>	<a href="mailto:william.siow@ioigroup.com">william.siow@ioigroup.com</a>
<b>Telephone</b>	+603-89478888 (Head Office)	<b>Facsimile</b>	+603-89432266 (Head Office)

2. Certification Information			
<b>Certificate Number</b>	RSPO 547027	<b>Certificate Start Date</b>	16/03/2020
<b>Date of First Certification</b>	16/03/2010	<b>Certificate Expiry Date</b>	15/03/2025
<b>Scope of Certification</b>	Production of 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"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input checked="" type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input 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		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	60mt/hr
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
<b>Is this a remote audit or on-site audit</b>	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
MSPO 700802	Part 3 of MS 2530 – Plantations and organized smallholders	BSI Services (M) Sdn Bhd	30/12/2023
MSPO 700801	Part 4 of MS2530- Palm Oil Mill	BSI Services (M) Sdn Bhd	30/12/2023
MSPO 720913	MSPO SCCS:2018	BSI Services (M) Sdn Bhd	22/12/2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Pamol Kluang POM	8 1/2 Miles, 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°06'43.01" N	103°23'08.03" E
Pamol Barat Estate	Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	2°06'46.09" N	103°20'38.00" E
Mamor Estate	Mamor Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	2°08'43.01" N	103°18'21.05" E
Unijaya Estate	Unijaya Estate, Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 8609 Kluang, Johor.	1°56'26.01" N	103°16'41.05" 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°40'29.00" N	103°39'13.06" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)			<input type="checkbox"/> Yes (please refer to Principle 7 for details)	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pamol Timur Estate	2,098	6.78	191.33	2,296.11	91.37
Pamol Barat Estate	2,124	7.23	179.09	2,310.32	91.94
Mamor Estate	2,073	48.36	***104.11	2,225.47	93.15
Unijaya Estate	*1,160	**1.47	92.53	1,254.00	92.50
Kahang Estate	2,278	4.11	137.79	2,419.9	94.14
Swee Lam Estate	1,098	2.16	60.80	1,160.96	94.58
<b>Total</b>	<b>10,831</b>	<b>70.11</b>	<b>765.65</b>	<b>11,666.76</b>	

**Note**  
**Unijaya Estate**  
 \*Total planted reduced 6ha due to realignment of riparian zone in PM07A, PM08A, PM16A and PM10A and replanting.  
 \*\*Decrease 0.50ha river due to the re-demarcation by GIS

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

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pamol Timur Estate	12	1,657	429	0	2,086	12
Pamol Barat Estate	193	1,931	0	0	1,931	193
Mamor Estate	183	201	1,689	0	1,890	183
Unijaya Estate	243	643	274	0	917	243
Kahang Estate	0	364	1,914	0	2,278	0
Swee Lam Estate	0	497	432	169	1,098	0
<b>Total (ha)</b>	<b>631</b>	<b>5,293</b>	<b>4,738</b>	<b>169</b>	<b>10,200</b>	<b>631</b>

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
<b>Estate / Smallholders</b>	<b>Tonnage / year</b>			
	<b>Estimated last year (Mar 22 – Feb 23)</b>	<b>Actual (Nov 21- Oct 22)</b>		<b>Forecast (Mar 23 – Feb 24)</b>
		Previous license period (Nov 21- Feb 22)	Current license period (Mar 22- Oct 22)	
Pamol Timur Estate	48,209	12,754.16	25,403.39	49,105
Pamol Barat Estate	32,134	10,573.23	24,274.5	46,897
Mamor Estate	48,533	17,778.04	30,071.79	42,493
Unijaya Estate	24,020	6,130.23	12,036.96	24,120
Kahang Estate	64,930	18,886.57	31,057.73	64,460
Swee Lam Estate	27,816	8,186.53	10,815.25	25,450
<b>Total</b>	<b>245,642</b>	<b>207,968.38</b>		<b>252,525</b>

**Note:** The production value is based on the actual number of workers for harvesting activity within reasonable productivity. Thus, the huge difference between the forecast of FFB production is mainly due to the expected enough workers for harvesting activity within April 2023 to March 2024.

While for Kahang Estate, it is located at area which is flat and undulating. Which expected to achieve 28mt/year with new recruitment of workers and crops recovery.

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
<b>Estate / Smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Mar 22 – Feb 23)</b>	<b>Actual (Nov 21- Oct 22)</b>		<b>Forecast (Mar 23 – Feb 24)</b>
		Previous license period (Nov 21- Feb 22)	Current license period (Mar 22- Oct 22)	
N/A		n/a	n/a	
<b>Total</b>		<b>N/A</b>		

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Mar 22 – Feb 23)</b>	<b>Actual (Nov 21- Oct 22)</b>		<b>Forecast (Mar 23 – Feb 24)</b>
		Previous license period (Nov 21- Feb 22)	Current license period (Mar 22- Oct 22)	
N/A	n/a	n/a	n/a	n/a
<b>Total</b>	<b>N/A</b>	<b>N/A</b>		<b>N/A</b>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	November 2021	22,823.45	-	22,823.45
2	December 2021	21,292.31	-	21,292.31
3	January 2022	16,353.22	-	16,353.22
4	February 2022	13,839.78	-	13,839.78
5	March 2022	16,740.16	-	16,740.16
6	April 2022	15,938.68	-	15,938.68
7	May 2022	15,665.12	-	15,665.12
8	June 2022	16,149.41	-	16,149.41
9	July 2022	15,865.71	-	15,865.71
10	August 2022	17,704.26	-	17,704.26
11	September 2022	16,731.85	-	16,731.85
12	October 2022	18,864.43	-	18,864.43
<b>TOTAL</b>		<b>207,968.38</b>	<b>-</b>	<b>207,968.38</b>

<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
Estimated last year (Mar 2022 – Feb 23)	Actual (Nov 21- Oct 22)		Forecast (Mar 23 – Feb 24)
	Previous license period (Nov 21- Feb 22)	Current license period (Mar 22- Oct 22)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
245,642 mt	74,308.76 mt	133,659.62 mt	252,525.00 mt
	<b>TOTAL</b>	207,968.38 mt	
<b>CPO (OER: 21.75%)</b>	<b>CPO (OER: 22.58%)</b>		<b>CPO (OER: 22.22%)</b>
53,427.14 mt	16,893.11 mt	30,070.25 mt	56,103.89 mt
	<b>TOTAL</b>	46,963.36 mt	
<b>PK (KER: 5.50%)</b>	<b>PK (KER: 4.72%)</b>		<b>PK (KER: 5.25%)</b>
13,510.31 mt	3,685.82 mt	6,129.81 mt	13,266.01 mt
	<b>TOTAL</b>	9,815.63 mt	

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	November 2021	5,119.06	1,119.43
2	December 2021	4,906.68	1,086.39
3	January 2022	3,765.11	845.32
4	February 2022	3,102.26	634.68
5	March 2022	3,856.80	781.71
6	April 2022	3,701.34	740.07
7	May 2022	3,620.61	711.67
8	June 2022	3,678.39	705.21
9	July 2022	3,656.22	733.99
10	August 2022	3,861.63	757.96
11	September 2022	3,673.68	784.69
12	October 2022	4,021.58	914.51
<b>TOTAL</b>		<b>46,963.36</b>	<b>9,815.63</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Mar'22 – Oct'22)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	24,988.18	-	-	341.15	25,329.33
<b>PK (MT)</b>	4,483.38	-	-	-	4,483.38
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (Nov'21- Feb'22)</b>					
<b>CPO (MT)</b>	19,074.34	-	-	1,014.25	20,088.59
<b>PK (MT)</b>	4,195.80	-	-	-	4,195.80
<b>Credits</b>	-	-	-	-	-

<b>11A. 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)
1	IOI Commodity Trading Sdn Bhd	RSPO_PO1000003601	44,062.52	8,679.18
<b>TOTAL</b>			<b>44,062.52</b>	<b>8,679.18</b>



**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Company XYZ	1,355.40	-
<b>TOTAL</b>		<b>1,355.40</b>	<b>-</b>

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
	N/A	N/A	N/A	N/A	N/A	N/A
<b>TOTAL</b>		<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

**Note:** 1 mt = 1 credit

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (Not Applicable)</b>							
<b>Credits</b>				N/A	N/A	N/A	N/A
<b>Physical</b>	N/A	N/A	N/A				
<b>Previous License period (Not Applicable)</b>							
<b>Credits</b>				N/A	N/A	N/A	N/A
<b>Physical</b>	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>Note:</b>							

## 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: Dr. Chaiyaporn Seekao ([Chaiyaporn.Seekao@bsigroup.com](mailto:Chaiyaporn.Seekao@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 92,000 certified locations and clients in over 193 countries. BSI 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 **21-25/11/2022**. 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 **08/02/2023**. 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. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer 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- Certification)</b>	<b>Year 2 (ASA2_1)</b>	<b>Year 3 (ASA _2)</b>	<b>Year 4 (ASA2_3)</b>	<b>Year 5 (ASA 2_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 22, 2023 – November 25, 2023**

**Total Number of Mandays: 15 mandays**

## 2.2 BSI Assessment Team

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Mohd Razaleigh bin Mohamad (MRM)	Team Leader	<p><b>Education:</b> Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p><b>Work Experience:</b> He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&amp;C, MSPO P&amp;C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p><b>Training attended:</b> He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed MSPO P&amp;C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training and RSPO endorsed Refresher training.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of legal, social, and stakeholder engagement.</p>
Vijay Kanna Pakirisamy (VKP)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p><b>Work Experience:</b> He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV &amp; HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training and RSPO endorsed Refresher training.</p> <p><b>Language proficiency:</b> Fluent in English, Bahasa Malaysia, Tamil.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Occupational, Health &amp; Safety, Estate Best Practices and supply chain requirements.</p>
<p>Nor Halis Abu Zar (NHA)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara</p> <p><b>Work Experience:</b> He has 6 years’ experience in Oil Palm Estate Management with Kulim Plantations Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course , HCV Training in year 2022 and SMETA Requirement Training.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Malaysia and English</p> <p><b>Aspects covered in this audit:</b> During this assessment, he assessed on the aspects of compliance to environment.</p>

**Accompanying Persons:**

Name	Role
Mohd Hafriazhar Mohd Mokhtar	Observer

**2.3 Assessment Plan**

The Assessment plan was sent to the client prior to the assessment

Date	Time	Subjects	MRM	VKP	NHAZ
Sunday 20/11/2022		Audit team travel to Kluang. Check in at Anika Hotel, Kluang	√	√	√
Monday 21/11/2022	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> <li>• Verification on previous audit findings</li> </ul>	√	√	√
	09.00 – 13.00	<b>Pamol Barat Estate</b> 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,	√	√	√
	10.00-11.00	Stakeholder consultation	√		
	13.00-14.00	Lunch			
	14.00-16.30	Continue with document review (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.	√	√	√
Tuesday 22/11/2022	09.00 – 13.00	<b>See Lam Estate</b> 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,	√	√	√
	13.00-14.00	Lunch	√	√	√
	14.00-16.30	Continue with document review (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).	√	√	√

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

Date	Time	Subjects	MRM	VKP	NHAZ
	16.30-17.00	Interim Closing briefing.	√	√	√
Wednesday 23/11/2022	09.00 – 13.00	<b>Unijaya Estate</b> 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,	√	√	√
	13.00-14.00	Lunch	√	√	√
	14.00-16.30	Continue with document review (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.	√	√	√
Thursday 24/11/2022	09.00 – 13.00	<b>Pamol POM</b> 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. Stakeholder interviews	√	√	√
	13.00-14.00	Lunch	√	√	√
	14.00-16.30	Continue with document review (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.	√	√	√
Friday 25/11/2022	09.00 – 13.00	<b>Pamol Timur Estate</b> 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, etc.	√	√	√
	13.00-14.00	Lunch	√	√	√

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

Date	Time	Subjects	MRM	VKP	NHAZ
	14.00-16.30	Continue with document review (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).	√	√	√
	15.30-16.00	Interim Closing briefing.	√	√	√
	16.00-16.30	Preparation of audit report	√	√	√
	16.30-17.00	Closing Meeting	√	√	√

**Major Non-conformities close out visit.**

Date	Time	Subjects	MRM
Tuesday 07/02/2023		Audit team travel to Kluang. Check in at Anika Hotel, Kluang	√
Wednesday 08/02/2023	0900-0915	Opening briefing by the audit team leader	√
	0915-1045	Verification of effective implementation of corrective actions for NCR #2280555-202211-M1@ Pamol Kluang POM a) Documentation b) Site visit c) Interview	√
	1045-1100	Travel to Unijaya Estate	√
	1100-1200	Verification of effective implementation of corrective actions for NCR #2280555-202211-M1@ Unijaya Estate a) Documentation b) Site visit c) Interview	√



### Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Refer to IOI Corporation Berhad Time Bound Plan approved by RSPO on 04/11/2022	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31st December 2021 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. The ACOP Report states that IOI Corporation Berhad plans to achieve 100% RSPO Certification for all estates and mill by 2023. RSPO secretariat approval obtained based on email communication dated 04/11/2022.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new acquisition. For PT Sawit Nabati Agro all group except PT KPAM plan to certified in 2023 while PT KPAM plan to certified in 2024. Due to Pandemic and in the process of obtaining the complete HGU and TBP has been approved by RSPO on 04/11/2022	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	IOI RSPO Time Bound Plan is approved by RSPO with valid justification from IOI	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?	Yes. PT Sawit Nabati Agro is Estates under IOI Group which consist of 4 estates which is PT BNS, PT PKS, PT BSS and PT KPAM. For PT Sawit Nabati Agro all group except PT KPAM plan to certified in 2023 while PT KPAM plan to certified in 2024. Due to Pandemic and in the process of obtaining the complete HGU.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 04/11/2022 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There has not been any isolated lapses in implementation of the plan	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 04/11/2022 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

of the plan? If yes a <b>Major</b> non-compliance shall be raised	submitted to RSPO. There has not been any isolated lapses in implementation of the plan	
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	<p>Updates on the RSPO CP Complaints case tracking was referred to on issues related to this on IOI's uncertified units prior to and during the audit. Verified that incidences of HCV clearance that were reported at the IOI's uncertified unit at Kalimantan, Indonesia namely PT BSS since year 2010 is being resolved as per the RSPO NPP and RSPO CP Complaints processes. Another 1 unit namely PT KPAM at Kalimantan, had undergone the NPP Public Consultation and approved in April 2018 and HCSA Peer Review Assessment completed in May 2018. Currently, the plantation is under development and pending issuance of Local Government HGU. Reports on the NPP progress made to resolve the issues at the said units were checked and monitored till latest update made available on:</p> <p><a href="https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail</a></p> <p>As off this audit, there has been no other incidences of any replacement of primary forest at any other area under the IOI group</p>	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>The concession in Indonesia PT. KPAM had undergone the NPP process prior to any new planting. RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018.</p> <p>The NPP public notification could be assessed through the link below: <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: <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>	Complied
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&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility as per the link below:</p> <p><a href="https://askrspo.force.com/Complaint/s/case/50090000028ErzqAAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028ErzqAAC/detail</a></p> <p>This is further check in the website: <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>.</p> <p>Only 1 (one) management unit identified with potential liability and require concept note and remediation plan as reported in case tracker.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	Further information on the current progress is currently available in IOI Corporation Berhad's	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	There were no labour dispute reported	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There was no legal non-compliance reported.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Internal audit was carried out for IOI Pelita Plantation Sdn Bhd (Sejap and Tegai Estate) and PT Sawit Nabati Agro Group in November 2022. Positive assurance statement was made based on the audit results. Frequency on internal audit was conducted on yearly basis.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders are being engaged during stakeholders consultation which are being carried out during social impact assessment (SIA). Issues raised during the session are being recorded and actions/resolutions being handled by respective units.	Complied

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
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 since there is no scheme smallholders and scheme out growers.	Not Applicable

**Approved Time Bound Plan**

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year
				Latitude	Longitude				
Pamol Kluang	Malaysia	Pamol Kluang POM	8½ Mile, Mersing Road, 86007 Kluang, Johor, Malaysia.	2.110969	103.392292	-	Certified		2010
	Malaysia	Pamol Timur Estate	Kluang, Johor	2.111947	103.385564	2,296.11	Certified		2010
	Malaysia	Pamol Barat Estate	Kluang, Johor	2.113033	103.343842	2,310.32	Certified		2010
	Malaysia	Mamor Estate	Kluang, Johor	2.147034	103.302668	2,230.00	Certified		2010
	Malaysia	Unijaya Estate	Kluang, Johor	1.940558	103.278069	1,260.50	Certified		2010
	Malaysia	Kahang Estate	Kluang, Johor	2.326773	103.494248	2,419.90	Certified		2010
	Malaysia	Swee Lam Estate	Kluang, Johor	1.674780	103.653778	1,160.96	Certified		2010
Bukit Leelau	Malaysia	Bukit Leelau POM	KM 75, Kuantan-Segamat Highway 26700 Muadzam Shah Pahang Darul Makmur	3.302979	103.137365	-	Certified		2010
	Malaysia	Bukit Leelau Estate	Muadzam Shah, Pahang	3.298692	103.132555	2,096.00	Certified		2010
	Malaysia	Detas Estate	Muadzam Shah, Pahang	3.547505	103.050146	2,225.78	Certified		2010
	Malaysia	Merchong Estate	Muadzam Shah, Pahang	3.024548	103.201716	1,952.50	Certified		2010
	Malaysia	Mekassar Estate	Muadzam Shah, Pahang	2.986702	103.167433	1,209.39	Certified		2010
	Malaysia	Leepang A Estate	Muadzam Shah, Pahang	3.003644	103.027223	2,403.70	Certified		2010
	Malaysia	Laukin A Estate	Muadzam Shah, Pahang	3.020739	103.045601	1,619.90	Certified		2010
Gomali	Malaysia	Gomali POM	5th Mile, Jalan Gemas-Batu Anam 85100 Segamat, Johor, Malaysia.	2.610811	102.679447	-	Certified		2010
	Malaysia	Gomali Estate	Segamat, Johor	2.611543	102.673415	2,555.75	Certified		2010
	Malaysia	Paya Lang Estate	Segamat, Johor	2.582588	102.707515	2,467.25	Certified		2010
	Malaysia	Tambang Estate	Segamat, Johor	2.631926	102.716559	2,010.70	Certified		2010

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	Malaysia	Sagil Estate	Tangkak, Johor	2.315033	102.634689	2,504.99	Certified		2010
	Malaysia	Regent Estate	Gemencheh, Negeri Sembilan	2.513968	102.404654	2,300.27	Certified		2010
	Malaysia	Bahau Estate	Bahau, Negeri Sembilan	2.809171	102.448731	2,841.41	Certified		2010
	Malaysia	Kuala Jelai Estate	Durian Tunggal, Melaka	2.774558	102.389750	679.2600	Certified		2010
	Malaysia	Bertam Estate	Jasin, Melaka	2.304039	102.284858	448.8000	Certified		2010
	Malaysia	Jasin Lalang Estate	Karak, Pahang	2.254799	102.421417	750.75	Certified		2010
Pukin	Malaysia	Pukin POM	KM 30, Lebuhraya Tun Abdul Razak, Keratong, 85007 Rompin, Pahang, Malaysia	2.721691	102.909500	-	Certified		2012
	Malaysia	Pukin Estate		2.718814	102.907972	2,428.12	Certified		2012
	Malaysia	Shahzan IOI 1 Estate		2.799583	102.848972	1,562.98	Certified		2012
	Malaysia	Shahzan IOI 2 Estate		2.816556	102.874028	1,640.74	Certified		2012
	Malaysia	Segamat Estate	KM 5, Jalan Segamat Muar, 85009 Segamat, Johor, Malaysia	2.489590	102.882880	1,896.40	Certified		2012
	Malaysia	Leepang A Estate	KM 68, Lebuhraya Segamat-Kuantan, 26700 Muadzam Shah, Pahang, Malaysia	3.010250	103.053417	2,725.12	Certified		2012
	Malaysia	Bukit Serampang Estate	KM 12, Jalan Sagil-Tangkak, 84900 Tangkak, Johor, Malaysia	2.323795	102.688279	2,403.70	Certified		2012
Unico Group	Malaysia	Unico POM	1.8 km Jalan Jeroco Off Mile 13, Lahad Datu Sandakan, Sandakan Highway, P.O Box 61532, 91123 Lahad Datu, Sabah, Malaysia	5.150044	118.222064	-	Certified		2018
	Malaysia	Unico 6 Estates	Unico Plantation Sdn. Bhd – Unico 6 MDLD 5123, KM3, Jalan Segama, 91100 Lahad Datu, Sabah, Malaysia	5.195769	118.302033	2,060.00	Certified		2018
	Malaysia	Ladang Asas Estates	MDLD 5123, KM3, Jalan Segama, 91100 Lahad Datu, Sabah, Malaysia	5.240000	118.270000	1,909.00	Certified		2018
Unico Desa	Malaysia	Unico Desa POM	Unico Desa POM, KM3, Jalan Segama, 91100, Lahad Datu, Sabah	5.413089	118.529331	-	Certified		2018

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	Malaysia	Unico 1 Estate	Unico-Desa Plantations Berhad - Unico 1 MDLD 5123, KM3, Jalan Segama, 91100 Lahad Datu, Sabah	5.411369	118.523278	2,317.50	Certified	2018
	Malaysia	Unico 2 Estate		5.419511	118.524750	2,352.02	Certified	2018
	Malaysia	Unico 3 Estate		5.465122	118.551314	2,203.80	Certified	2018
	Malaysia	Unico 4 Estate		5.397883	118.559472	2,235.69	Certified	2018
	Malaysia	Unico 5 Estate		5.373783	118.536417	2,287.47	Certified	2018
Morisem	Malaysia	Morisem POM	MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia	5.494069	118.369039	-	Certified	2013
	Malaysia	Morisem 1 Estate		5.490000	118.320000	2,032.00	Certified	2013
	Malaysia	Morisem 2 Estate		5.460000	118.320000	2,042.14	Certified	2013
	Malaysia	Morisem 3 Estate		5.500000	118.330000	2,013.70	Certified	2013
	Malaysia	Morisem 4 Estate		5.340000	118.340000	2,023.00	Certified	2013
	Malaysia	Leepang 2 Estate		5.510000	118.380000	2,159.19	Certified	2013
Syarimo	Malaysia	Syarimo POM	KM23, Jalan Kinabatangan, Sg. Pin, Kinabatangan, Sabah, Malaysia Postal Address: MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia.	5.333611	117.781250	-	Certified	2013
	Malaysia	Syarimo 1 Estate	Sg. Pin, Kinabatangan, Sabah Postal Address:	5.329078	117.825278	1,914.00	Certified	2013
	Malaysia	Syarimo 2 Estate	MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia.	5.327342	117.784797	1,986.52	Certified	2013
	Malaysia	Syarimo 3 Estate		5.329461	117.776236	2,442.02	Certified	2013
	Malaysia	Syarimo 4 Estate		5.384028	117.764725	2,376.95	Certified	2013
	Malaysia	Syarimo 5 Estate		5.351153	117.715642	2,267.55	Certified	2013
Baturong	Malaysia	Baturong POM	Postal Address: MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia.	4.755261	118.088681	-	Certified	2010

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

			Location Address: KM 52, Jalan Kunak-Tawau, Off Road KM3, 91109 Lahad Datu, Sabah, Malaysia						
	Malaysia	Baturong 1 Estate	Location Address: KM 52, Jalan Kunak-Tawau, Off Road KM6, 91109 Lahad Datu, Sabah, Malaysia	4.736017	118.070986	2,698.00	Certified		2010
	Malaysia	Baturong 2 Estate		4.765442	118.028244	2,315.00	Certified		2010
	Malaysia	Baturong 3 Estate		4.757722	118.002142	1,807.00	Certified		2010
	Malaysia	Cantawan Estate		5.065683	118.447639	1,163.00	Certified		2010
Leepang	Malaysia	Leepang POM	MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia.	5.549000	118.437667	-	Certified		2013
	Malaysia	Morisem 5 Estate		5.500658	118.420417	1,889.00	Certified		2013
	Malaysia	Leepang 1 Estate		5.549358	118.443772	2,364.04	Certified		2013
	Malaysia	Leepang 5 Estate		5.546683	118.434836	1,690.67	Certified		2013
	Malaysia	Permodalan 1 Estate		5.498853	118.456917	2,253.82	Certified		2013
	Malaysia	Permodalan 2 Estate		5.507639	118.478289	2,141.52	Certified		2013
Mayvin	Malaysia	Mayvin POM	Mayvin Incorporated Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia	5.555300	117.226440	-	Certified		2010
	Malaysia	Mayvin 1 Estate		5.581886	117.221517	1,610.00	Certified		2010
	Malaysia	Mayvin 2 Estate		5.558614	117.222721	1,812.81	Certified		2010
	Malaysia	Tangkulap Estate	Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia	5.492423	117.247353	2,277.45	Certified		2010
	Malaysia	Mayvin 5 Estate		5.479906	117.334011	1,765.18	Certified		2010
	Malaysia	Mayvin 6 Estate		5.478833	117.379064	1,836.82	Certified		2010
Sakilan	Malaysia	Sakilan POM	Mile 22, Sandakan/Telupid Road, WDT 164, 90009, Sandakan, Sabah, Malaysia.	5.839372	117.843825	-	Certified		2010
	Malaysia	Sakilan Estate	Sandakan, Sabah	5.846975	117.887669	2,296.37	Certified		2010
	Malaysia	Linbar 1 Estate	Sandakan, Sabah	5.549619	117.681506	2,628.17	Certified		2010
	Malaysia	Linbar 2 Estate	Sandakan, Sabah	5.502308	117.645242	2,211.83	Certified		2010

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

Pamol Sabah	Malaysia	Pamol Sabah POM	Pamol Estates (Sabah) Sdn Bhd, Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia.	6.002417	117.398389	-	Certified		2016
	Malaysia	Ulu Estate	Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia.	6.005139	117.392361	1,834.72	Certified		2016
	Malaysia	Bayok Estate		6.005139	117.392361	2,209.93	Certified		2016
	Malaysia	Rungus Estate		6.015639	117.367694	2,126.55	Certified		2016
	Malaysia	Tindakon Estate		5.980028	117.356472	2,051.02	Certified		2016
	Malaysia	Nangoh Estate		5.952417	117.253111	2,279.35	Certified		2016
	Malaysia	Meliau Estate		5.952417	117.253111	2,998.65	Certified		2016
	Malaysia	Sugut Estate	Mile 200, Nangoh Paitan Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia.	6.232972	117.426556	1,792.34	Certified		2016
Ladang Sabah	Malaysia	Ladang Sabah POM	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah, Malaysia.	5.729989	117.577750	-	Certified		2013
	Malaysia	Bimbingan 1 Estate		5.621264	117.445917	1,937.39	Certified		2013
	Malaysia	Bimbingan 2 Estate		5.619619	117.422942	1,955.61	Certified		2013
	Malaysia	Labuk Estate		5.670375	117.498867	2,668.50	Certified		2013
	Malaysia	Moynod Estate		5.740817	117.610380	3,043.71	Certified		2013
	Malaysia	Luangmanis Estate		5.763328	117.606369	2,713.29	Certified		2013
	Malaysia	Laukin Estate		5.778469	117.532433	2,503.53	Certified		2013
	Malaysia	Terusan Baru Estate		5.764825	117.610317	2,128.00	Certified		2013
	Malaysia	Sungai Sapi Estate		5.807536	117.517003	1,299.30	Certified		2013
PT Sawit Nabati Agro Group	Indonesia	PT. SKS POM	West Kalimantan	-2.800399	110.593248	-	Not Certified	2022	Audited on 28/11/2022-03/12/2022 and still pending for Major NC closure
	Indonesia	SKS 1 Estate	West Kalimantan	-2.796567	110.583043	1,396.81	Not Certified	2022	
	Indonesia	SKS 2 Estate	West Kalimantan	-2.792711	110.585289	3,156.39	Not Certified	2022	
	Indonesia	SKS 3 Estate	West Kalimantan	-2.792711	110.538993	3,126.80	Not Certified	2022	



**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	Indonesia	BNS 1 Estate	West Kalimantan	-2.794823	110.645469	2,867.42	Not Certified	2022	
	Indonesia	BNS 2 Estate	West Kalimantan	-2.794823	110.645469	1,513.94	Not Certified	2022	
	Indonesia	BNS 3 Estate	West Kalimantan	-2.854558	110.660853	2,128.60	Not Certified	2022	
	Indonesia	BNS 4 Estate	West Kalimantan	-2.854558	110.660853	2,320.04	Not Certified	2022	
	Indonesia	BSS 1 Estate	West Kalimantan	-2.811201	110.913005	3,563.85	Not Certified	2022	
	Indonesia	BSS 2 Estate	West Kalimantan	-2.877076	110.826776	2,041.15	Not Certified	2022	
	Indonesia	BSS 3 Estate	West Kalimantan	-2.895104	110.760975	2,509.10	Not Certified	2022	
	Indonesia	BSS 4 Estate	West Kalimantan	-2.895104	110.760975	1,689.90	Not Certified	2022	
	Indonesia	KPAM 1 Estate	West Kalimantan	-2.758733	110.961786	2,408.00	Not Certified	2024	
	Indonesia	KPAM 2 Estate	West Kalimantan	-2.723094	111.043692	2,499.83	Not Certified	2024	
	Indonesia	KPAM 3 Estate	West Kalimantan	-2.761629	111.017109	2,307.02	Not Certified	2024	
	Indonesia	KPAM 4 Estate	West Kalimantan	-2.723094	111.043692	1,252.15	Not Certified	2024	
IOI Pelita Plantation Sdn Bhd	Malaysia	Sejap Estate	Miri, Sarawak	3.688694	114.170944	4,959.80	Not Certified	TBC	Land dispute settlement in progress. Expected certification to be in 2025 while it can earlier / later depending of settlement completion. RSPO is aware and had approved the TBP obtained 04/11/2022.

### 3.3 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 One (1) Critical; Two (2) Minor nonconformities and Three (3) Opportunity For Improvement raised. The IOI Pamol Kluang POM 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>	2280555-202211-M1	<b>Issued Date</b>	25/11/2022
<b>Due Date</b>	25/02/2022	<b>Closure Date</b>	08/02/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.1 (Critical)		
<b>Statement of Nonconformity:</b>	Mitigation Plans and Procedures related H&S Risk was not fully implemented.		
<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	<p><b><u>Pamol POM</u></b></p> <p>During site visit at the Shovel operations at the EFB Yard, it was found that the Shovel was without side mirrors, rare view mirror, reverse sensor and treadles tires. HIRARC for Shovel dated 16/02/2022 was reviewed. Monitoring of risk control has not been effectively been done.</p> <p>During site visit at the Ramp, it was noticed that 1 tractor driver with registration number JKU 2032 from the estate were wearing rubber shoes as their PPE. It was not in line with HIRARC Tractor dated 16/02/2022 Existing Control PPE: Topi Keselamatan, Kasut Keselamatan.</p> <p>During site visit at the Boiler, it was found that 1 unit of container was contained with lubricant without any label. It was not in line with CHRA recommendations dated 19/04/2019, 8.1.10 Labelling &amp; Relabelling (Regulation 20 &amp; 21) Containers containing chemical hazardous to Health has to be labelled.</p> <p><b><u>Unijaya Estate</u></b></p> <p>During site visit at Harvesting area (Motorized Cutter) at PM16B, it was noted that petrol was brought for motorized cutter usage. However, the container was not labelled. Other than that, there were no SDS brought to that area for emergency purpose. It was not in line with CHRA recommendation dated 08/04/2019 8.1.10 Labelling &amp; Relabelling (Regulation 20 &amp; 21) Containers containing chemical hazardous to Health has to be labelled and Section 8.1.13 Provision of SDS In Place Of Work: It shall be kept in a conspicuous place close to each location where chemical is used and be easily accessible to the workers and made available in the National Language and English.</p>		
<b>Corrections:</b>	<b><u>Pamol POM</u></b>		

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>a) Pamol Mill has instructed the contractor to stop using the shovel with immediate effect until he repairs and installs the side mirrors, rear view mirror, reverse sensor and change the tires.</p> <p>b) The AP in-charge has been given a verbal warning to ensure that all persons entering the mill workplace e.g. ramp, weighbridge, process area wear proper safety shoes and hard hat.</p> <p>c) Pamol Mill has retrained all workers to ensure that containers that contain fuel, chemical and lubricants have SDS and labels. Pamol Mill has also re-labelled all containers that are used to transfer fuel, lubricants and chemicals from their original containers.</p> <p><b><u>Unijaya Estate</u></b> The management has instructed storekeeper and supervisors/staffs to ensure that all chemical containers that contain chemicals, fuel and lubricants have SDS and labels. SDS are to be available at all areas that the chemicals are used or stored.</p>
<b>Root Cause Analysis:</b>	Ineffective monitoring systems in order to ensure compliance the management plan as per stated in hazard risk assessment and CHRA due to no specific documentation control system for monitoring.
<b>Corrective Actions:</b>	<p><b><u>Pamol POM</u></b></p> <p>a) A shovel checklist has been developed and issued to the contractor to carry out daily inspection of his shovel and working equipment in the workplace.</p> <p>b) A checklist has been developed and implemented. Pamol Mill will carry out routine inspections to ensure shovels are in good condition and repairs are carried out as soon as possible. Training was conducted for all APs to ensure proper checking is carried out before vehicles are allowed to enter the mill compound.</p> <p>c) A memo was sent to all mill APs, contributing estates and contractors to wear safety shoes and hard hat if entering the mill workplace e.g. ramp, weighbridge, process area. Training was conducted for all APs to ensure proper checking is carried out before anyone or vehicle is allowed to enter the mill compound.</p> <p><b><u>Unijaya Estate</u></b></p> <p>a) The existing checklist has been revised to include checking of labelling and SDS for all chemical containers before they are taken to the fields.</p> <p>b) A refreshment training was carried out for all storekeeper, staffs and mandores on the requirement of labelling and SDS for all chemical containers.</p>
<b>Assessment Conclusion:</b>	<p>Site visit for Major Non conformities has been conducted on 08/02/2023</p> <p><b><u>Pamol POM</u></b></p> <p>a) Site visit has been conducted to EFB yard area where the shovel is operating. Sighted that side mirrors, rear view mirror, reverse sensor and tire has been replaced. Base on the documentation, sighted that checklist for monitoring shovel has been established and implemented. Sample has been taken for November 2022.</p> <p>b) Interview with auxiliary police has been conducted during the visit. Base on interview, it has been confirmed that they received written warning from the</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>management and training has been conducted for them on the process for FFB received. Training records sighted dated 13/12/2022. During the visit also, sighted that all FFB lorry driver is wearing appropriate PPE (safety helmets and safety shoes)</p> <p>c) Refreshment training for chemical handler and storekeeper has been conducted on 29/11/2022 by Mr Chua Seng Wei. As per interview with workers at boiler station and store keeper, they can demonstrate their understanding on the training. Sighted also all chemical has been labelled appropriately and sighted specific container has been allocate for chemical transfer from store to boiler area.</p> <p><b>Unijaya Estate</b></p> <p>a) Checklist for harvesting workers sighted in the document "Senarai Semak alat pelindung diri penuai dan penolak buah sawit manual atau berjentera/pengutip biji/penyusun pelepah" sighted and include SDS as one of the requirement. Sample for checklist has been taken for November and December 2022. Training for all harvesters sighted 10/12/2022 and base on interview, there is evidence that all harvesters can demonstrate their understanding on the training. Sighted that all chemical for petrol has been labelled accordingly. SDS has been carried by the mandore.</p> <p>Correction and corrective action has been identified sufficient to close the NC.</p>
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Non-conformity																		
<b>NCR Ref #</b>	2280555-202211-N1	<b>Issued Date</b>	25/11/2022															
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	Open															
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.1 (Minor)																	
<b>Statement of Nonconformity:</b>	The Waste Management Plans were not adequately implemented.																	
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.																	
<b>Objective Evidence:</b>	<p>The Waste Management Plans were not adequately implemented. Evidence as follows.</p> <p>The SW date of generation stated in the Inventory of Scheduled Wastes Monthly Records and on the Scheduled Waste sticker placed at the stores showed different dates.</p> <p><u>Pamol Barat Estate</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>SW Code</th> <th>Inventory Record Generation Date</th> <th>Store Sticker Generation Date</th> </tr> </thead> <tbody> <tr> <td>SW 409</td> <td>18/08/2022</td> <td>17/08/2022</td> </tr> <tr> <td>SW 305</td> <td>21/08/2022</td> <td>15/08/2022</td> </tr> <tr> <td>SW 410 (Filter)</td> <td>30/08/2022</td> <td>Not Available</td> </tr> <tr> <td>SW 410 (PPE &amp; Rags)</td> <td>30/08/2022</td> <td>18/08/2022</td> </tr> </tbody> </table>			SW Code	Inventory Record Generation Date	Store Sticker Generation Date	SW 409	18/08/2022	17/08/2022	SW 305	21/08/2022	15/08/2022	SW 410 (Filter)	30/08/2022	Not Available	SW 410 (PPE & Rags)	30/08/2022	18/08/2022
SW Code	Inventory Record Generation Date	Store Sticker Generation Date																
SW 409	18/08/2022	17/08/2022																
SW 305	21/08/2022	15/08/2022																
SW 410 (Filter)	30/08/2022	Not Available																
SW 410 (PPE & Rags)	30/08/2022	18/08/2022																

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	SW 312	15/09/2022	01/09/2022
	SW 110	17/11/2022	18/11/2022
	<u>Swee Lam Estate</u>		
	SW Code	Inventory Record Generation Date	Store Sticker Generation Date
	SW 410	03/08/2022	30/08/2022
	SW 305	04/08/2022	03/08/2022
	SW 312	03/11/2022	03/08/2022
	<u>Unijaya Estate</u>		
	The estate had generated SW305 (Waste Oil) on 16/08/2022 and still currently being stored at the Scheduled Waste Store. Nevertheless, inventory of Scheduled Waste (e-swiss) as of November 2022 stated the balance for SW 305 was Zero.		
	<u>Pamol Timur Estate</u>		
SW Code	E-swiss Inventory Record	Store Sticker Generation Date	
SW 410	Oct 2022	13/09/2022	
SW 104	Oct 2022	13/09/2022	
SW 305	Oct 2022	30/09/2022	
SW 306	Oct 2022	30/09/2022	
<b>Corrections:</b>	Operating Centres has immediately amended the dates on the scheduled waste labels to tally with the data in the ESWIS		
<b>Root Cause Analysis:</b>	Poor recording systems to ensure that inventory records and SW label is tally. Issues that has been highlighted in the environmental management plan has not been discussed in the meeting.		
<b>Corrective Actions:</b>	A new recording form has been prepared by Safety, Health and Environment department and sent to all operating centres entitled 'Scheduled Waste Generated Records'. Operating centres have been instructed to record data in this form whenever scheduled waste is generated and stored. The total SW generated is compiled at the end of each month before the total is keyed into the ESWIS system. Issues that highlighted in the environmental management plan will be discussed in the environment every quarter.		
<b>Assessment Conclusion:</b>	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment		

Non-conformity			
<b>NCR Ref #</b>	2280555-202211-N2	<b>Issued Date</b>	25/11/2022
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	Open

<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 (Minor)
<b>Statement of Nonconformity:</b>	Implementation were not in accordance with IOI Procedures.
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.
<b>Objective Evidence:</b>	<p><b>Pamol POM</b></p> <p>During the site visit at the Final Discharge Water Pump. It was noticed that there were leakages from both the pumps. The leakages were not identified, and no action has been taken prior to the visit.</p> <p><b>Unijaya Estate.</b></p> <p>Sample of contract agreement between IOI Group and recruiting agent dated 21/04/2022 which mentioned in clause 2, that the management will reimburse total amount RM450 for passport and medical checkup.</p> <p>Newly recruited Indian workers has been sampled who joined on 05/09/2022 and found out reimbursement has not been paid in September salary.</p> <p><b>Pamol Barat Estate</b></p> <p>Monitoring of incoming and outgoing water course at 3 natural streams was done once a year by the estate management. The recent water sampling was done on 11/08/2022. The analysis was done by IOI Research Centre and the report results (Report Number: PBE/09/09/2022) was available for verification. The report states that the pH value at (W0822/029 APB-3) is 4.9 which is less than the Reference Range (&gt; 5.0). There were no resampling and root cause identification done as per WQI Flowchart and procedures.</p>
<b>Corrections:</b>	<p><b><u>Pamol POM</u></b></p> <p>Residues from leakage of discharge water pump have been upkept by scrapping the floor and transferring the residues to the effluent pond. Besides, seal packing had been installed at mono pump to stop the leakage.</p> <p><b><u>Unijaya Estate</u></b></p> <p>The estate management has made arrangement to reimburse the payment of Pre-Medical Check-up and Normal Passport cost to the Indian workers in November 2022's salary.</p> <p><b><u>Pamol Barat Estate</u></b></p> <p>Stream water analysis: RC have been contacted to recollect the water sample and investigate the cause of low pH at APB-3. Appendix 2 for confirmation email from RC on the date of investigation and WQI re-sampling.</p>
<b>Root Cause Analysis:</b>	<p>Implementation of the procedure has not been properly done due to ineffectiveness of the training has been conducted.</p> <p><b><u>Pamol POM</u></b></p> <p>Monitoring has not been conducted and Preventive measure has not been established to ensure that there is no leakage at final discharge area.</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p><b><u>Unijaya Estate</u></b> Ineffective monitoring on information dissemination and immature implementation since it just been implemented</p> <p><b><u>Pamol Barat Estate</u></b> Ineffective monitoring for incompliance of water analysis and unclear timeline in the procedure</p>
<b>Corrective Actions:</b>	<p>Training for each SOP will conducted annually and assessment for understanding will be done after the training.</p> <p><b><u>Pamol POM</u></b> Bund will be constructed to contain any accidental leakage. Preventive maintenance will be carried out on weekly basis to check the condition of pump/ pipes at effluent station.</p> <p><b><u>Unijaya Estate</u></b> The management issued a reminded memo to the office staffs to remind them and ensure all emails from Human Resources (HR) department will highlighted as "Highly importance" and inform management immediately. Besides, the payroll clerk is also reminded to monitor and ensure that any reimbursement for workers are being paid on time without delay in future.</p> <p><b><u>Pamol POM</u></b> <b>WQI Sampling Flowchart</b> been updated and included the action and it timeframe that shall be taken by estate management if the river water analysis do not meet the specifications</p>
<b>Assessment Conclusion:</b>	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	Indicator 3.5.1 "IOI Plantation has established internal procedure title "Foreign workers recruitment guideline & procedure in Malaysia" and "Appendix D: Workers Declaration Standard Operating procedure" which stated that the new workers need to sign declarations when they arrived in Malaysia from the origin country. It can be further improve for the management to identify the best timing for the workers to sign the declaration in order to ensure that input received is based on the actual scenario.
<b>OFI 2</b>	Indicator 6.2.4 Linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.
<b>OFI 3</b>	Indicator 7.3.2 The estates can initiate the process of updating the 'Name of Reporting Officer' for Scheduled Waste responsibilities and reporting to ensure in line with current PICs.

Positive Findings	
PF #	Description
PF 1	<ul style="list-style-type: none"> <li>• Good cooperation with the sustainability and management team.</li> <li>• Good retrieval of records and documents</li> <li>• Maturity of the system can be seen during assessment</li> </ul>

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	2130106-202111-M1	<b>Issued Date</b>	26/11/2021
<b>Due Date</b>	24/2/2022	<b>Closure Date</b>	23/2/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	7.10.3 (Critical)		
<b>Statement of Nonconformity:</b>	Plan to reduce or minimise significant pollutants was not effectively implemented and monitored		
<b>Requirement Reference:</b>	Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.		
<b>Objective Evidence:</b>	<p>Based on observation during site visit at Pamol POM parameter discharge points;</p> <p>Oil trap no.1 - Hot water flowing to oil trap no.1 and discharge to the nearby estate drain/stream.</p> <p>Oil trap no.5 - Unpleasant odor of orangey/yellowish murky water with oil scum observed in all 3 compartments of oil trap</p> <p>No evidence to show that discharge limit has been met from both oil traps and comply with EQA 1974, section 25(1) restriction on pollution on inland water.</p>		
<b>Corrections:</b>	<p>Oil trap no 1:</p> <p>Environmental Aspect and Impact Assessment is revised to include buffer such as sump is made to reduce the temperature from blowdown of boiler from entering straight to the nearby drain/waterways.</p> <p>Oil trap no 5:</p> <p>Immediate action has been taken by cleaning off the oil trap no 5 by the workers and currently no cleaning has been done in kernel bunker area until the modification at kernel area is done.</p>		
<b>Root Cause Analysis:</b>	<p>Oil trap no 1:</p> <p>Existing Control Measure (ECM) in Environmental Aspect Impact Assessment (EAIA) do not include plan to control high temperature of boiler's blowdown water from entering drainage /waterways system without proper buffer in order to reduce the temperature. Thus, it was not properly implemented.</p> <p>Oil trap no 5:</p> <p>Besides, in the Environmental Aspect and Impact 2021 for column Existing Control Measure do not mention that the palm oil mill should be equipped with facility to</p>		
<b>Corrective Actions:</b>	contain the residues from cleaning water in kernel bunker area from flowing straight into nearby oil trap. Thus, the wastewater from cleaning activity in kernel bunker		



	area was flowing straight into oil trap no 5 with no sump to contain the residues from cleaning activity
<b>Assessment Conclusion:</b>	<p>Oil trap no 1: Cooling pit will be constructed with dimension of 1m(length) x 1m (width) x 1m (height) with additional of ventilation fan to speed up the cooling process of hot water from the boiler blowdown until the temperature reach below 38 Degree Celsius before it flowing into oil trap no 1 and discharge into the nearby drain.</p> <p>Oil trap no 5: Mill will modify drainage system at the kernel bunker area by building another retention sump to filter contaminants from cleaning activity at the bunker from flowing straight to Oil trap no 5.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	The Oil Trap No.1 and No. 5 was visited during the site visit at the mill. It was noticed that there were no oil traces at the final outlet as the oil trap mechanism were adequate to trap the oil. The monitoring records were available for verification. Hence the critical non-conformity remains closed.

Non-conformity			
<b>NCR Ref #</b>	2130109-202111-N1	<b>Issued Date</b>	26/11/2021
<b>Due Date</b>	ASA 2_3	<b>Closure Date</b>	25/11/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	7.11.3 (minor)		
<b>Statement of Nonconformity:</b>	Engagement process with adjacent stakeholders on fire prevention and control measures was not effectively demonstrated.		
<b>Requirement Reference:</b>	The unit of certification engages with adjacent stakeholders on fire prevention and control measures		
<b>Objective Evidence:</b>	Based on the last group stakeholder meeting minute dated 28/10/21 for Pamol Complex, fire prevention and control measures presented to the stakeholders. Adjacent stakeholders (Ladang Kekayaan, Ladang Tereh, Smallholder near to PM98E @ Bukit Batu - Mamor Estate) and (Zamrud Estate, Sembrong Estate, Ladang Hutan Getah - Kahang Estate) were invited but none of them attended the meeting. No further engagement process being done for the adjacent stakeholders to communicate on fire prevention and control measures.		
<b>Corrections:</b>	Engagement process has been done to the absent stakeholders. For Mamor estate, the absent stakeholder are Ladang Kekayaan, Ladang Tereh and Smallholder near to PM98E @ Bukit Batu. Meanwhile, for Kahang estate are Zamrud Estate, Sembrong Estat anLadang Hutan Getah.		
<b>Root Cause Analysis:</b>	There was no mechanism to demonstrate engagement process with adjacent stakeholders on fire prevention and control measures		
<b>Corrective Actions:</b>	Mechanism of engagement with stakeholders and slides for fire prevention and control measures have been established (Appendix 2 and 3). All the related documents was distributed to all operating centres (Appendix 1). The mechanism includes stakeholders who attend stakeholders meeting and others who are unable to attend.		

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>When the invited stakeholder is unable to attend, operating centre shall make arrangements to meet the stakeholder and provide the following documents</p> <ol style="list-style-type: none"> <li>1) Fire prevention and Emergency Response Procedures (Appendix 5),</li> <li>2) To ensure stakeholder signs the briefing acknowledgement form (Appendix 4)</li> </ol>
<b>Assessment Conclusion:</b>	<p>During external stakeholder meeting that was carried out at each Operating centres (Estate &amp; Mill), all stakeholders including neighbour was briefed on fire prevention and control measures. Besides that, all operating centres also been prepared Emergency Response Plan (Fire in Field/ Peat Areas in Own or Neighbouring Estate).</p> <p><u>Pamol POM</u></p> <p>The stakeholders have been provided with the slides regarding to Fire Prevention and Control Measures by IOI Plantations with the acknowledgement form undersigned by the stakeholders on 14/10/2022.</p> <p><u>Pamol Timur Estate</u></p> <p>The stakeholders have been provided with the slides regarding to Fire Prevention and Control Measures by IOI Plantations with the acknowledgement form undersigned by the stakeholders on 06/10/2022 and 23/11/2022</p> <p>Hence the minor non-conformity was successfully closed and concluded on 25/11/2022.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	N/A

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>OFI Statement:</b></p> <p>7.12.2</p> <p>i) Identification of HCVA to be clearly reported in the HCV assessment carried out by HCVRN trained assessor. Currently the HCVA hectarage combined with self-declared/set-aside conservation area. ii) Signage clearly indicating the HCVA to be clearly marked and erected. Currently the available signage marked as conservation area.</p> <p><b>Verification / Follow-up actions:</b></p> <p>High Conservation Value (HCV) &amp; Conservation Area Assessment was conducted by the IOI Group HQ and documented in a report titled High Conservation Value (HCV) &amp; Conservation Area Assessment and Management Action Plans (Review Document) where most reports were conducted in November 2022. The exercise has taken into consideration all aspects of environmentally sensitive areas such as rivers, streams, ponds, wildlife boundaries and was documented in the report. The report states the HCV areas and conservation areas respectively. Visit to the sampled areas indicated that signages were clearly erected indicating the HCV and Conservation areas.</p>
<b>OFI 2</b>	<p><b>OFI Statement:</b></p> <p>2.1.1</p> <p>Based on mill's compliance schedule, monitoring of upstream and downstream of Sg Sembrong shall be carried out on monthly basis. Standard reference used is Class III of NWQS as referred to the monthly report by the appointed consultant. Off-limit results reported especially for one (1) of the sampling point in the upstream of Sg Sembrong. Further clarification has yet to be made with DOE on the specific</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	parameter to be referred either based on standard A (EQ Regulation, Sewage and Industrial Effluent 2009) or Class III of NWQS. No clear reference on which discharge standard to be applied as per mill's compliance schedule.	
	<b>Verification / Follow-up actions:</b>	
	Pamol POM is required by DOE under the Compliance Schedule to monitor river water quality at the river nearby to the mill which is Sungai Sembrong on a monthly basis. The mill has corresponded with DOE and established that the reference on water discharge to be applied is against the parameters set under Class III National Water Quality Standard (NWQS).	
	The river water analysis was conducted by Etosh Consult & Engineering Plt and available for verification as below.	
	Description	September
	Date Sample Received	06/09/2022
	Date Sample Reported	13/09/2022
Reference Number	PAMOL/STREAM/SEPT/2022	
Sample Description	River Water	
Results	All sampling points comply with Class III National Water Quality Standard (NWQS)	

**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1852239-201911-M1	Major	2.1.1	29/11/2019	Closed on 28/02/2020
1992177-202011-M1	Major	5.1.6	26/11/2020	Closed on 11/01/2021
1992177-202011-M2	Major	6.2.3	26/11/2020	Closed on 11/01/2021
1992177-202011-M3	Major	6.2.4	26/11/2020	Closed on 11/01/2021
1992177-202011-N1	Minor	2.1.2	26/11/2020	Closed on 26/11/2021
2130109-202111-M1	Major	7.10.3	26/11/2021	Closed on 23/02/2022
2130109-202111-N1	Minor	7.11.3	26/11/2021	Closed on 25/11/2022
2280555-202211-M1	Major	3.6.1	25/11/2022	Closed on 08/02/2023
2280555-202211-N1	Minor	7.3.1	25/11/2022	Open
2280555-202211-N2	Minor	3.3.2	25/11/2022	Open

**3.4 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 Pamol Kluang POM Certification Unit's environmental and social performance, legal and any known dispute issues.

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal stakeholder	Gender representative for each operating unit	Face to face
Local communities	Kampung Pengkalan Tereh	Face to face
Local communities	Kampung Sri Tambak	Face to face
Local communities	Kampung Gajah	Face to face
Contractor	Sasaran Emas PLT	Face to face
Contractor	SP Shine Enteprise	Face to face
Government agencies	Polis Diraja Malaysia	Face to face
Neighbouring estate	Pakloh Estate	Face to face

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks: Gender representative for each operating unit</b></p> <p>5 gender representatives for each operating have been interviewed. Based on the interview, there is evidence that all female workers can participate in gender committee and has been invited for meeting that will be conducted every 6 months. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as period delay will be submitted online on monthly basis. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All workers have been paid as per collective agreement with MAPA/NUPW and Minimum Wages Order 2022. All female workers received same benefits, leave and others. New mother assessment has been conducted for each operating units and has been confirmed by one of representative which also new mother with baby ages 1 year 8 months.</p> <p><b>Audit Team verification and response:</b> No further verification required</p>
<b>2</b>	<p><b>Feedbacks: Kampung Pengkalan Tereh, Kampung Sri Tambak and Kampung Gajah</b></p> <p>Both head of village for Kampung Pengkalan Tereh and Kampung Gajah has been interviewed. Most of the villagers works as public and government servant, fisherman, village works. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>there are no operation/ activities in estates and POM that give adverse effect to the local communities. Any vacancies in estate/POM will be posted at notice board and nearby coffee shops at the village area. As per interview, some villagers work in the estate and POM. There is 1 river that flowing through village and estates which also source of income for the villager. There is no cases of pollution has happen and identified by the villagers.</p>
	<p><b>Audit Team verification and response:</b> No further verification required</p>
<b>3</b>	<p><b>Feedbacks: Contractors (Sasaran Emas PLT and SP Shine Enterprise)</b></p> <p>As per interview, both contractors have signed contract agreement and they also mentioned that they are aware the statement of compliance of legal requirement and prohibition of child labour, force labour and others.</p> <p>Both contractors have been asked on payment, where payment will be done every 15<sup>th</sup> each month. For both contractors, payment made based on tonnage mentioned in the weighbridge tickets. They also confirmed that there is no pending payment and payment has been made based on the payment terms,</p>
	<p><b>Audit Team verification and response:</b> No further verification required</p>
<b>4</b>	<p><b>Feedbacks: Government Agency (Polis Diraja Malaysia)</b></p> <p>Good relationship has been maintained by both parties. Communication has been done through phone call and consultation with stakeholders. There is no issues of civil crime has been convicted by any of the workers in IOI Pamol Kluang Certifications Units.</p>
	<p><b>Audit Team verification and response:</b> No further verification required</p>
<b>5</b>	<p><b>Feedbacks: Neighbouring estate (Pakloh Estate)</b></p> <p>Boundaries for both estates has been well maintained by both parties and can be clear seen base on boundary markers and 10ft drain that has been constructed. Mr Syafiq confirmed that there is no dispute or land issues between both companies. He also aware method/mechanism of communication if there is any issues related to land.</p>
	<p><b>Audit Team verification and response:</b> No further verification required</p>

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	11,673.27	Yes	No	Yes, ownership changed due to estate bought over by IOI Corporation Berhad on 17/01/2003



Previous land owner / user comment – Not applicable	
	<b>Feedbacks:</b>
	<b>Audit Team verification and response:</b>

**3.5 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.

**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that IOI Pamol Kluang Certification Unit has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that IOI Pamol Kluang Certification Unit is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name: Mohd Razaleigh bin Mohamad</b>	<b>Name: Mohamad Zulkarnain bin Zubir Ahmadi</b>
<b>Company Name: BSI Services (M) Sdn Bhd</b>	<b>Company Name: IOI Plantation Services Sdn. Bhd.</b>
<b>Title: Client Manager</b>	<b>Title: Assistant Manager, Sustainability</b>
<p>Signature: </p>	<p><b>Signature:</b>  <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></p>
<b>Date: 30/11/2022</b>	<b>Date: 09/02/2023</b>

**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.            - Critical (Major) compliance -</p> <p>The Pamol Kluang certification unit is able to demonstrate that documents specified in the RSPO P&amp;C are made available to the public. The publicly available documents are available at the office notice board at Mill and every estate, and inside the office which can be assessed by stakeholders if they wish to. These include documents related to environmental, social and legal issues such as:</p> <ul style="list-style-type: none"> <li>a) Company policies, including Sustainable Policy which contains policy on protection of human rights defenders,</li> <li>b) Land titles</li> <li>c) High Conservation Value and High Biodiversity Value document summaries</li> <li>d) Details of complaints and grievances</li> <li>e) Negotiation procedures</li> <li>f) Business unit organizational structure</li> <li>g) Public summary of certification assessment report</li> <li>h) Negotiation procedures</li> <li>i) Meeting of minutes with stakeholders, safety and welfare committee meetings</li> <li>j) Continuous improvement plans</li> </ul>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>The company policies were shared with the stakeholders during stakeholder meetings held as follows</p> <ul style="list-style-type: none"> <li>a. Communication of the companies' policy has been done during the stakeholders consultation on 14/10/2022 for all operating units for all external stakeholder</li> <li>b. Communication for internal stakeholders in Pamol POM has been on 11/10/2022</li> <li>c. Communication for internal stakeholder done in Pamol Barat Estate on 03/10/2022 with attendance of representative from Masjid, Temple, sundry shops and contractors</li> <li>d. While for Swee Lam Estate, communication of the procedure has been done during the stakeholders consultations dated 05/08/2022 and 23/08/2022</li> <li>e. For Unijaya Estate, communication of the policies has been done during the internal stakeholders dated 04/10/2022</li> <li>f. For Pamol Timur Estate, communication of the procedure has been done during the stakeholders consultations on 04/11/2022</li> </ul>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the company policies are available in dual language, i.e., Bahasa Malaysia and English. Information requested by government department stakeholders are prepared in Bahasa Malaysia. Refer to Indicator 1.1.3 below.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>There is no information request has been received by stakeholders only request for assistance. Any request of information will be recorded in the "Consultation and communication logbook"</p>	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.</p> <p>- Critical (Major) compliance -</p>	<p>The consultation and communication procedures are documented under the IOI Group Plantation Division Group Social Impact Assessment &amp; Management Action Plans (Guidance Document) for</p>	Complied



**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>period 2019 – 2024, and approved by the Plantation Director dated March 2019.</p> <p>This procedure was disclosed and made available to relevant as per communication the procedure has been done during the stakeholders consultation on 14/10/2022 for all operating units. It also has been posted at the notice board at each operating units.</p> <p>The management of each operating units also appointed person in charge responsible for the procedure. Details as per below</p> <ol style="list-style-type: none"> <li>1) For Pamol POM, Mr Shathyaruban A/L Selvadurai has been appointed as PIC for communication and consultation procedure dated 05/09/2022 signed by Mr Rajan A/L Sinnathamby.</li> <li>2) For Pamol Barat Estate, Mr Mohamad Akmal Azwan Affendi bin Daud has been appointed as social liaison officer base on appointment letter dated 15/09/2022</li> <li>3) While for Swee Lam Estate, Mr Zul Aizat Ramli has been appointed base on appointment letter dated 20/07/2018</li> <li>4) Mr Muhammad Fahmirul bin Mohd Yazid has been appointed as PIC for the implementation of the procedure dated 01/10/2022</li> <li>5) Mr Muhammad Amin Abd Rahni, has been appointed as PIC for Pamol Timur Estate dated 24/08/2020</li> </ol>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>There is no changes and update list of stakeholders for each operating units and has been confirmed with the management operating units. Each unit within Pamol Kluang Mill and its supply bases have their own list of stakeholders. The stakeholders comprise relevant government agencies such as the Labour Department, Immigration Department, Department of Environment, Department of Safety and Health, India High Commissioner, Bangladesh High Commissioner, Nepal and Indonesian Embassies, etc. Also included are neighbouring estates, neighbouring villages,</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		schools, canteen/shop operators, suppliers, contractors, etc. Contact details for each stakeholder and their nominated representatives are also available.	
<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 -	<p>A Policy known as 'Code of Business Conduct &amp; Ethics' June 2020 is available which was sighted and verified during the audit. Among others, this Policy calls for:</p> <ul style="list-style-type: none"> <li>a) Dealing fairly with customers, suppliers, contractors, competitors and other employees;</li> <li>b) Avoid situations of conflict of interests between personal interest and interests of the Company;</li> <li>c) Not to be influenced by receiving favours, and not to influence by giving favours;</li> <li>d) Not to accept any kinds of bribes or kickbacks or other unlawful or unethical benefits.</li> </ul> <p>This Policy is available on the IOI Plantation website (<a href="http://www.ioigroup.com">www.ioigroup.com</a>) and shared with internal and external stakeholders. Socialisation of the Policy was done via posters publicly displayed within the Pamol Mill and its supply bases, as well as during Policy briefings given to workers.</p>	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 -	<p>Mechanism to monitor compliance of the policy has been done through internal audit. Details as per below</p> <p><u>Pamol POM</u></p> <p>Internal audit has been done on 19/10/2022 by sustainability department and there is nonconformities has been raised for incompliance to the policy.</p> <p><u>Pamol Barat Estate</u></p>	Complied

		<p>Internal audit done on 12/10/2022 by the sustainability department. There is non-compliance to the policy has been identified during the internal audit.</p> <p><u>Swee Lam Estate</u></p> <p>Internal audit done on 11/10/2022 by sustainability department. There is non-compliance to the policy has been identified during the internal audit.</p> <p>Furthermore, the grievance mechanism support with Whistleblowing Policy revised on October 2019. Para 4.0 stated that the complainants may choose to remain anonymous when reporting on the particular grievance).</p>	
<p><b>Principle 2: Operate legally and respect rights</b></p>			
<p><b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p><b>(C)</b> The Unit of Certification complies with legal requirements          - Critical (Major) compliance -</p>	<p>Applicable Law and Regulation has been updated when there is new law coming into force. Refer Legal Requirement Register that involved all related regulations that related to Mill and Estates. Latest reviewed has been conducted on 05/07/2022. Sample of updated law was Minimum Wages Order 2022. The units of certification were complied with Legal Requirement. Refer Evaluation of Licence and Permits Rev. 03 dated 01/12/2021. Sample of licence and permits as below:</p> <p><u>Pamol POM</u></p> <ol style="list-style-type: none"> <li>1. MPOB Licence #500040104000 valid from 01/04/2022 to 31/03/2023.</li> <li>2. Diesel Permit #J005304 for 18000 Liter valid from 26/03/2022 to 25/03/2024</li> </ol>	<p>Complied</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> <li>3. Energy Commissioning 011037/2022 valid until 05/10/2022</li> <li>4. Air Compressor #JH PMT 90498 valid until 03/01/2023</li> <li>5. Competence Person CePPOME, #CePPOME/2215830, NRIC 970527-XX-XXXX valid from 28/07/222 to 28/07/2023</li> <li>6. Competence Person CePSWaM, #CePSWaM/03617, NRIC 910709-XX-XXXX dated 26/02/2020.</li> <li>7. Competence Person Steam, #JKKP PP 8022 dated 06/12/2021</li> <li>8. Competence Person A4 #PJ-4H-0003-2002 dated 15/05/2021</li> </ol> <p><u>Pamol Barat Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB Licence #504177802000 valid from 01/06/2022 to 31/05/2023</li> <li>2. Air Compressor #JH PMT 13793 valid until 20/06/2023</li> <li>3. Weighbridge Certificate #BU206956 valid until 15/12/2022</li> <li>4. Licence for Water Extraction BAKAJ #BAKAJ:334/700-20/6/7/6 valid until 31/12/2022</li> <li>5. Salary Deduction for Surau #TK(NJ)U-23 dated 04/07/2019</li> </ol> <p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB Licence #617329002000 valid from 01/05/2022 to 30/04/2023</li> <li>2. Diesel and petrol permit #KPDNKK.J-JB/26/5A/11/262(P/D)(P13) valid from 28/06/2021 to 27/06/2024</li> <li>3. Air Compressor #PMT-JH/22 180609 valid until 22/09/2023</li> <li>4. Weighbridge Certificate #BU206956 valid until 15/12/2022</li> </ol>	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>5. Licence for Water Extraction BAKAJ #BAKAJ:334/300/05/01/07/20 valid until 31/12/2022</p> <p>6. Certificate of fitness for houses #TK(NJ)/Pelan(JB)74Jld.11 dated 04/11/2018</p> <p>7. Weighbridge #A3973738 Inspected on 04/10/2022</p> <p><u>Unijaya Estate</u></p> <p>1. MPOB Licence #504524202000 valid from 01/08/2022 to 31/07/2023</p> <p>2. Diesel permit #BPGK JH (KLU) 2176 SK valid from 22/12/2021 to 21/12/2023</p> <p>3. Air Compressor #PMT-JH/22 169925 valid until 20/06/2023</p> <p>4. Licence for Water Extraction BAKAJ #BAKAJ:334/300/05/07/07/34 valid until 31/12/2022</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 management for each operating units maintained same system to track change to the laws and regulations where IOI Plantations has established Mechanism of Tracking Law Changes . Any changes to the applicable law and regulation is monitored by the SPO Department in Segamat Regional Office. The SPO Department will notify the operating units on the changes. The Sustainability and Safety Coordinators at each operating units will update the changes. The Certification Unit continued to use their established Legal Requirement Register to ensure all legal compliance are in place. It involves the following process:</p> <ul style="list-style-type: none"> <li>• It is periodically reviewed by the nominated Mill/Estate Assistant Manager with guidance from the Peninsular Malaysia Sustainability, Safety and Health Department to ensure changes</li> </ul>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>in law are 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 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> </ul>																
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>Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit at estates. Apart from that, erection of concrete slab with GPS coordinate along the boundaries was also commonly practiced and clearly visible. Boundary and monthly patrolling record was verified.</p> <table border="1" data-bbox="1137 1018 1926 1267"> <thead> <tr> <th>Estate</th> <th>Field/Block</th> <th>Neighbouring to:</th> </tr> </thead> <tbody> <tr> <td>Pamol Barat Estate</td> <td>17</td> <td>Smallholders</td> </tr> <tr> <td>Swee Lam Estate</td> <td>14C</td> <td>Smallholders</td> </tr> <tr> <td>Unijaya Estate</td> <td>PM15C</td> <td>Sime Darby Lambak</td> </tr> <tr> <td>Pamol Timur Estate</td> <td>PM14B</td> <td>Ong Estate</td> </tr> </tbody> </table>	Estate	Field/Block	Neighbouring to:	Pamol Barat Estate	17	Smallholders	Swee Lam Estate	14C	Smallholders	Unijaya Estate	PM15C	Sime Darby Lambak	Pamol Timur Estate	PM14B	Ong Estate	Complied
Estate	Field/Block	Neighbouring to:																
Pamol Barat Estate	17	Smallholders																
Swee Lam Estate	14C	Smallholders																
Unijaya Estate	PM15C	Sime Darby Lambak																
Pamol Timur Estate	PM14B	Ong Estate																
<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>																		

2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties is maintained accordingly. Refer Stakeholder List for the year 2022 for Mill and sampled estates. Listings contains names and contact details of the contractors, and this information were verified and found in order.</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>All the contractors have signed an agreement prior to provide any services. There is an addendum to the contract agreement where specifically mentioned the contractor shall comply with applicable labour and employment laws (Refer Special Condition Clause No 2, 3 and 4 in the agreement). Interviewed with the contractors confirmed that they are aware of the terms and conditions outlined in the agreement and comply accordingly. Payment to contractors were made according with the term in the agreement. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors were available.</p> <p>Sampled of the contract agreement and payment record as below:</p> <p>Pamol POM</p> <ol style="list-style-type: none"> <li>1. Contract Agreement between Yewtan Enterprise Sdn Bhd with Pamol POM, Type of work: Transport CPO to Refinery from 01/09/2021 to 30/06/2024, dated 01/09/2022.</li> <li>2. Contract Agreement between Tuan Kwee Sdn Bhd with Pamol POM, Type of work: Transport CPO to Refinery from 01/09/2021 to 30/06/2024, dated 01/09/2022.</li> </ol> <p>Pamol Barat Estate</p> <ol style="list-style-type: none"> <li>1. Contract Agreement: Sasaran Emas Plt Contract No: PBE/001-22/23 dated 01/07/2022, Type of work: Transport FFB to Pamol Mill. Validity: 01/09/2022 to 30/08/2025.</li> <li>2. Contract Agreement: Tanjong Emas Construction. Contract No: PBE/002-22/23 dated 01/10/2022, Type of work: JCB Sundry</li> </ol>	Complied

**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

		<p>Work. Validity: 01/10/2022 to 30/09/2023.</p> <p>Swee Lam Estate</p> <ol style="list-style-type: none"> <li>1. Contract Agreement between Sasaran Pentas Bhd with Swee Lam Estate, Type of work: Transport FFB to Pamol Kluang POM from 01/09/2022 to 31/08/2025, dated 19/09/2022.</li> <li>3. Contract Agreement: Nice Brother Sdn Bhd. Contract No: SLE/004-22/23 dated 01/07/2022, Type of work: JCB Sundry Work. Validity: 01/07/2022 to 30/06/2023.</li> </ol> <p>Unijaya Estate</p> <ol style="list-style-type: none"> <li>1. Contract Agreement: Tanjung Emas Construction. Contract No: UJE/007-22/23 dated 01/09/2022, Type of work: JCB Sundry Work. Validity: 01/09/2022 to 30/08/2023.</li> <li>2. Contract Agreement: Murarvin Enterprise Sdn Bhd. Contract No: XXXXXX dated 01/05/2021, Type of work: FFB Transport To Mill. Validity: 01/05/2021 to 30/04/2024.</li> </ol> <p>Pamol Timur Estate</p> <ol style="list-style-type: none"> <li>1. Contract Agreement: Chandran A/L A.Sinniah. Contract No: PTE/002-22/23 dated 01/07/2022, Type of work: Loading and Transport FFB Work. Validity: 01/07/2022 to 30/06/2022.</li> <li>2. Contract Agreement: Jayakumar Maju Enterprise. Contract No: PTE/003-22/23 dated 01/07/2022, Type of work: FFB Transport To Mill. Validity: 01/07/2022 to 30/06/2022.</li> </ol> <p>Due diligence for each contractors has been done by operating units each months where all document related to workers has been collected by each operating units for verification. Other than, it has been inspected base workplace inspection that has done every 3 months by the management and will be discuss during the OSH meeting.</p>	
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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 sampled contracts with contractors contain a provision that contractors and service providers are aware and will not engage in child, forced and trafficked labour. This provision is available under Clause 1(d) of Additional Requirements for Contractors which was signed and acknowledged by the respective contractors. The sampled contracts as per 2.2.2.</p>	Complied
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
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>The Pamol Kluang Mill processes only FFB from its own group of estates and does not source FFB from other third parties either directly or indirectly. Therefore, this indicator is not applicable</p>	Not Applicable
2.3.2	<p>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.</p> <p>- Minor compliance -</p>	<p>The Pamol Kluang Mill processes only FFB from its own group of estates and does not source FFB from other third parties either directly or indirectly. Therefore, this indicator is not applicable</p>	Not Applicable
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p><u>IOI Pamol POM</u></p> <p>The 5 Year Business Plan was established for all IOI Pamol POM and available for verification. The Business Plan is reviewed on a yearly basis by the management. The Business Plan covers the Summary Supplying Estates 5 years Crop Projection, 5 Year Mill Capacity and Projection and detailed expenditure costs.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

5 Year Mill Capacity and Projection was available as below.

Financial Year	MT	OER %	KER %
2021/2022 (Actual)	245,390.97	23.75	4.50
2022/2023	245,712.00	23.75	4.50
2023/2024	250,626.00	21.75	5.50
2024/2025	247,739.00	22.00	5.50
2025/2026	249,309.00	22.00	5.75

IOI Pamol Supply Base Estates

The 5 Year Business Plan was established for all IOI Pamol Certification Unit estates and available for verification. The Business Plan is reviewed on a yearly basis by the management. The Business Plan covers the area statement, Crop (FFB) by Year Planting, Crop (FFB) Monthly Breakdown, 10 Years Replanting Programme, Summary Replanting programme by Field, Detail Replanting Programme by Field, Executive/Staff & Workers requirement, General Charges Statement, Mature Oil Palm Costing Statement, Capital Expenditure Statement and Summary Replanting Cost to Maturity.

Verified the FFB Crop (Mt) projection (2023/2024 – 2025/2026) for the sampled estates as below:

Estate	22/23	23/24	24/25	25/26
Pamol Timor Estate	48,408	53,984	55,953	53,953
Pamol Barat Estate	34,169	49,535	51,452	53,390

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<table border="1"> <tr> <td>Mamor Estate</td> <td>44,950</td> <td>34,800</td> <td>34,600</td> <td>37,500</td> </tr> <tr> <td>Kahang Estate</td> <td>44,950</td> <td>34,800</td> <td>34,600</td> <td>37,500</td> </tr> <tr> <td>Swee Lam Estate</td> <td>29,650</td> <td>22,950</td> <td>22,950</td> <td>21,900</td> </tr> </table>	Mamor Estate	44,950	34,800	34,600	37,500	Kahang Estate	44,950	34,800	34,600	37,500	Swee Lam Estate	29,650	22,950	22,950	21,900																					
Mamor Estate	44,950	34,800	34,600	37,500																																		
Kahang Estate	44,950	34,800	34,600	37,500																																		
Swee Lam Estate	29,650	22,950	22,950	21,900																																		
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Annual replanting programme has been established by the estates under Pamol Certification Unit. Verified the 5 Years replanting Programme Summary 2022/2023 – 2026/2027. The replanting programme for the next 5 years has been stated below.</p> <table border="1"> <thead> <tr> <th rowspan="2">IOI – Pamol Certification Unit</th> <th colspan="5">Financial Year</th> </tr> <tr> <th>22/23</th> <th>23/24</th> <th>24/25</th> <th>25/26</th> <th>26/27</th> </tr> </thead> <tbody> <tr> <td>Pamol Timor Estate</td> <td>-</td> <td>-</td> <td>100</td> <td>126</td> <td>-</td> </tr> <tr> <td>Pamol Barat Estate</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Unijaya Estate</td> <td>-</td> <td>67.00</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Swee Lam Estate</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	IOI – Pamol Certification Unit	Financial Year					22/23	23/24	24/25	25/26	26/27	Pamol Timor Estate	-	-	100	126	-	Pamol Barat Estate	-	-	-	-	-	Unijaya Estate	-	67.00	-	-	-	Swee Lam Estate	-	-	-	-	-	Complied
IOI – Pamol Certification Unit	Financial Year																																					
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Unijaya Estate	-	67.00	-	-	-																																	
Swee Lam Estate	-	-	-	-	-																																	
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>IOI Pamol Operating Units held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</p> <ol style="list-style-type: none"> <li>1. Results of Internal Audit</li> <li>2. Customer Feedback</li> <li>3. Status of preventive and corrective action plans</li> <li>4. Follow Up actions for management reviews</li> <li>5. Changes that could affect the management system</li> <li>6. Recommendations for improvement</li> </ol>	Complied																																			

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>The minutes of meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p> <ul style="list-style-type: none"> <li>a) Pamol POM: 20/10/2022</li> <li>b) Pamol Timor Estate: 20/10/2022</li> <li>c) Pamol Barat Estate: 20/10/2022</li> <li>d) Swee Lam Estate: 20/10/2022</li> <li>e) Unijaya Estate: 20/10/2022</li> </ul>	
<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 plans for all operating units for financial year 2022/2023 were documented under Environmental impact assessment management action plans and continuous improvement plans available at all visited operating units. Social and environmental were among pertinent elements covered in the action plan. On top of the established plan, allocation of capital expenditure (CAPEX) for process improvement, social and environmental components were also sighted.</p> <p>For Pamol POM, it has been updated on 19/10/2022 prepared by Mr Shathyruaan A/L Selvadurai. Details of improvement plan as below</p> <ul style="list-style-type: none"> <li>a. To upgrade the workers quarters: 6 units of workers have been refurbished</li> <li>b. To build a new staircase for the volleyball court</li> <li>c. To conduct family days</li> <li>d. To refurbish the monsoon drain in the worker`s quarters.</li> </ul>	<p>Complied</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p><u>Pamol Barat Estate</u></p> <p>Continuous improvement plan established and updated on 17/10/2023 by Mr Mohd Akmal Azwan Affendi as social liaison officer.</p> <ul style="list-style-type: none"> <li>a. To build garage at for staff quarters</li> <li>b. To build a community hall</li> <li>c. To purchase fertility vehicle</li> <li>d. To paint all workers quarters and staff quarter 64 units workers quarters and 4 units staff quarter.</li> </ul>	
<p>3.2.2</p>	<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></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>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.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of IOI Pamol POM certification unit's metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from October 2021 – September 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics</p>	<p>Complied</p>
<p><b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) in the form of written document for mill and estates were documented and maintained. It covers procedures all operations relayed to the management of the mill and estate.</p> <p>The mill's management process and operations are guided by the following documents:</p>	<p>Complied</p>

**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> <li>1. Group Standard Operating Procedures (StOP) for Palm Oil Mill Operations, 01/07/2017</li> <li>2. Group Standard Operating Procedure (StOPs) for estate dated 30/09/2020.</li> <li>3. Group Safe Operating Procedures (SaOP)</li> <li>4. Group Social Impact Assessment and Management Action Plans (Guidance Document) dated 10 Oct 2011</li> <li>5. Group Environmental Impact Assessment and Management Action Plans dated December 2007.</li> <li>6. Internal Audit Procedure dated 01 Nov 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 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> <li>- Proper disposal of waste material.</li> </ul>	
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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.          - Minor Compliance -</p>	<p>IOI Pamol POM &amp; Supply Base have a mechanism to check consistent implementation of procedures through periodical internal audit by Sustainability, Safety &amp; Health Department (Peninsular). Non-compliances recorded with regards to applicable P&amp;C 2018 indicators have been identified &amp; closed accordingly. The mechanism of checking the consistent implementation was mainly carried out through field supervision by field staff, executive and managers. Besides that, regular visits by the Plantation Director and Plantation Controller to monitor the adherence to the organisation’s SOP was also done. Documents were available as below.</p> <p><u>Pamol POM</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit conducted by Sustainability, Safety &amp; Health Department (Peninsular) for Environmental &amp; GMP Compliances on 19/10/2022.</li> <li>2. Safety &amp; Health Internal Audit conducted by Safety &amp; Health Executive on 19/10/2022.</li> <li>3. Environmental Audits conducted biannually by 3<sup>rd</sup> Party Auditors in compliance with DOE – Compliance Schedule. Recently conducted Environmental Audit on 18/08/2022.</li> </ol> <p><u>Pamol Barat Estate</u></p> <ol style="list-style-type: none"> <li>1. Safety &amp; Health Internal Audit Report 2022 by Safety &amp; Health Executive on 26/09/2022.</li> <li>2. Internal Audit conducted by Sustainability, Safety &amp; Health Department (Peninsular) for Environmental &amp; GMP Compliances on 12/10/2022.</li> </ol> <p><u>Swee Lam Estate</u></p>	<p>Non-compliance</p>
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**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> <li>1. Safety &amp; Health Internal Audit Report 2022 by Safety &amp; Health Executive on 08/10/2022.</li> <li>2. Internal Audit conducted by Sustainability, Safety &amp; Health Department (Peninsular) for Environmental &amp; GMP Compliances on 11/10/2022.</li> </ol> <p><u>Unijaya Estate</u></p> <ol style="list-style-type: none"> <li>1. Safety &amp; Health Internal Audit Report 2022 by Safety &amp; Health Executive on 12/10/2022.</li> <li>2. Internal Audit conducted by Sustainability, Safety &amp; Health Department (Peninsular) for Environmental &amp; GMP Compliances on 18/10/2022.</li> </ol> <p><u>Pamol Timur Estate</u></p> <ol style="list-style-type: none"> <li>1. Safety &amp; Health Internal Audit Report 2022 by Safety &amp; Health Executive on 07/10/2022.</li> <li>2. Internal Audit conducted by Sustainability, Safety &amp; Health Department (Peninsular) for Environmental &amp; GMP Compliances on 13/10/2022</li> </ol> <p>Nevertheless, the implementation was not in accordance with IOI Procedures as per below evidences.</p> <p><u>Pamol Barat Estate</u></p> <p>Monitoring of incoming and outgoing water course at 3 natural streams was done once a year by the estate management. The recent water sampling was done on 11/08/2022. The analysis was done by IOI Research Centre and the report results (Report Number: PBE/09/09/2022) was available for verification. The</p>	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>report states that the pH value at (W0822/029 APB-3) is 4.9 which is less than the Reference Range (&gt;5.0). There were no resampling and root cause identification done as per WQI Flowchart and procedures. Hence a minor nonconformity was raised.</p> <p><u>Pamol POM</u></p> <p>During the site visit at the Final Discharge Water Pump. It was noticed that there were leakages from both the pumps. The leakages were not identified, and no action has been taken prior to the visit.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The monitoring of the SOP implementation was closely made by all levels of the supervisory personnel to the top management with records maintained and checked. The records sighted were as follows.</p> <ul style="list-style-type: none"> <li>a. Internal Audit</li> <li>b. Daily production/work records for the core activities at the estates</li> <li>c. Field cost book,</li> <li>d. Worksite Inspection</li> <li>e. Linesite Inspection</li> <li>f. Chemical consumption record</li> <li>g. Mature/immature field work program             <ul style="list-style-type: none"> <li>- fertilizer application,</li> <li>- herbicide spraying,</li> <li>- harvesting and collection of FFB.</li> </ul> </li> </ul> <p>All the above records were kept for a minimum period of 12 months.</p>	Complied

<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 are no new plantings or new operations within Pamol Certification Unit. Nevertheless, each unit has its own Social and Environmental Impact Assessments prepared internally by the Sustainability Department. Environmental Impact Assessment – Management Plans and Continuous Improvement Plans have been established by the mill and estates and are subject to periodic reviews in the event of new legislation enforced by National State laws or in the event of any new cost-effective technology development in the sites. The EIA is available for verification at every site that was sampled.</p> <p>Social impact assessment has been updated and documented “Social Impact Assessment, Management Action Plans &amp; continuous Improvement Plan” for each operating units. The assessment is updated on annual basis base on the outcome of the meeting, inspection and consultation with stakeholders.</p> <p>For Pamol POM, it has been updated on 19/10/2022 prepared by Mr Shathyruabaan A/L Selvadurai which valid until 19/10/2023. Data and information has been collected from stakeholders consultations done on 12/10/2022(internal) and 14/10/2022 (external), JCC meeting, grievances books and line site inspection.</p> <p>Document review on the assessment, IOI Group’s estates has identified key social factors related to operating center and manage on appropriate measure by monitor the progress of the outcome in social management plan.</p> <p>The key social factors identified as significant as follow:</p> <ol style="list-style-type: none"> <li>1. No recruitment fees</li> </ol>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> <li>2. Expectation for better income</li> <li>3. Comfortable labor quarters and amenities</li> <li>4. Placing water dispenser at the estates' offices</li> <li>5. Food waste in the drainage</li> <li>6. Placing dustbin for cleanliness and hygiene at the labor quarters.</li> </ol>	
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>Social impact assessment management plan has been updated and documented "Social Impact Assessment, Management Action Plans&amp; continuous Improvement Plan" for each operating units. The assessment will be done and updated on annual basis base on the outcome of the meeting, inspection and consultation with stakeholders.</p> <p>For Pamol POM, it has been updated on 19/10/2022 prepared by Mr Shathyrubaan A/L Selvadurai which valid until 19/10/2023. Data and information has been collected from stakeholders consultations done on 12/10/2022(internal) and 14/10/2022 (external), JCC meeting, grievances books and line site inspection.</p> <p>Environmental Impact Assessment – Management Plans and Continuous Improvement Plans have been established by the mill and estates and are subject to periodic reviews in the event of new legislation enforced by National State laws or in the event of any new cost-effective technology development in the sites. The EIA were available for verification at every site that was sampled</p>	Complied
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>Environmental Impact Assessment – Management Plans and Continuous Improvement Plans have been established by the mill and estates and are subject to periodic reviews in the event of new legislation enforced by National State laws or in the event of any</p>	Complied

		<p>new cost-effective technology development in the sites. The EIA were available for verification at every site that was sampled.</p> <p>While for social management plan, there is evidence that management plan has been implemented and monitored. Sample of issues that has been highlighted as per below</p> <p>a) Poor maintenance of the housing area (e.g. missing window panes, door knob, clog toilet, etc.). –  <u>Implementation:</u> Grievance procedure has been communicated as explain in indicator 4.2.2 and records of complaint on workers housing has been maintained and issues has been resolved</p> <p>b) Medical treatment for serious/emergency cases is not available at the clinic.  <u>Implementation:</u> van and double cab has been provided to each operating units to send workers for any medical treatment emergency cases to nearest clinic</p> <p>c) Risk of uncontrolled price at the shop.  <u>Implementation:</u> Monitoring of the pricing at the sundry shops has been done by the management of each operating units, Price list of item (Senarai Harga Barang). Comparison between other sundry shop also been done by the estate management to ensure that the price is affordable by the workers.</p> <p>d) There is concern on the security of woman worker in plantation especially exposure to sexual harassment in field.  <u>Implementation:</u> The gender committees at Pamol Kluang Mill and supply bases, are known as the Women Empowerment Committees (WEC) has been established. The WEC consists of all female employees, and wives of workers are also invited ot</p>	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>join their activities as part of mechanism to report any issues of harassment in the plantations.</p> <p>As per verification that has been done, there is evidence that monitoring plan has been found effective to ensure all issues highlighted in the management plan has been resolved.</p>	
<b>Criterion 3.5:</b> 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>SOPs on the following procedures are documented, made available and sighted during the audit:</p> <p>a. Employment procedure for workers (recruitment, selection, hiring) dated 11 August 2020;</p> <p>b. Retirement procedure dated 21 July 2020;</p> <p>c. Termination procedure dated 11 August 2020;</p> <p>d. Absconded foreign workers procedure dated 8 Feb 2021</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The employment procedures are implemented and records of employment procedures are maintained. Sighted in the sampled Malaysian workers' files the following documents:</p> <p>a) Job application form</p> <p>b) Interview assessment form</p> <p>c) Relevant certificates</p> <p>d) Copies of identity documents</p> <p>e) Job offer letter</p> <p>f) Performance appraisal form</p> <p>Details of sample workers as per below</p> <ul style="list-style-type: none"> <li>• Pamol Barat Estate: 2 field workers from Nepal</li> <li>• See Lam Estate: 2 field workers from India.</li> </ul>	Complied

		Sighted that interview has been conducted at the origin country by the management and has been recorded. Sighted also that both workers has signed employment contract. Further interview verified the process of recruitment and they can demonstrate their understanding on the employment contract.	
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
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>Procedures of Safety Management Plans Kluang Pamol POM and Estates has been established. OSH Plan and training schedule has been documented. Refer Safety &amp; Health Management Plan (July 2020 – June 2025) dated 15/11/2022.</p> <p>All operations were risk assessed to identify H&amp;S issues in the estate and mill. Mitigation plans and procedures were documented and implemented as verified below.</p> <p>Pamol POM</p> <ol style="list-style-type: none"> <li>1. The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 16/02/2022</li> <li>2. Chemical Hazard and Risk Assessment (CHRA) has been conducted with report reference number HQ/04/ASS/00/193-2019/043 dated 19/04/2019.</li> <li>3. Medical Surveillance has been conducted on 30/09/2022 by DAB OH Sdn Bhd. A total of 41 workers were examined and none of them got abnormal results or recommended for removal.</li> </ol>	Non-compliance

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> <li>4. Periodic Inspection, Testing &amp; Examination Of Engineering Control (LEV) has been conducted on 05/07/2022 with report reference number: HT(II)-J/22-07/03.</li> <li>5. Noise Risk Assessment (NRA) has been conducted on with report reference number HQ/LPROYKPEB/20/00158 dated 13/05/2022 &amp; HQ/LPROYKPEB/21/00602 dated 21/10/2021 (Biogas)</li> <li>6. Audiometric test has been conducted as per NRA recommendation dated 30/09/2022. A total of 45 workers were examined and result indicates that 37 have normal hearing, 8 workers with abnormal audiogram and none of them fall under Standard Threshold Shift(STS) Audiometric Test #AUDIO2022/Pamol Kluang/Re test &amp; Me_OHD/May 2022 dated 29/04/2022</li> <li>7. Workplace Inspection has been conducted on monthly basis. Latest record sighted on 02/11/2022.</li> </ol> <p>Pamol Barat Estate</p> <ol style="list-style-type: none"> <li>1. The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 29/10/2022. Sample check on the HIRARC Harvesting, Chemical Store and Tractor.</li> <li>2. Chemical Hazard and Risk Assessment (CHRA) has been conducted on 22/03/2019 by ENV Consultancy &amp; Monitoring Services Sdn Bhd with report reference number HQ/04/ASS/00/193-2019/017.</li> </ol>	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> <li>3. Medical Surveillance has been conducted on 22/06/2022 by Poliklinik Intan (RZ Intan Medicatre Sdn Bhd). A total of 13 workers were examined and the results were all workers are certified as fit to work.</li> <li>4. Noise Risk Assessment (NRA) has been conducted on 11/07/2020 by ETOSH Consult &amp; Engineering Plt. with report reference number HQ/LPROYKPEB/20/00171.</li> <li>5. Audiometric test has been conducted as per NRA recommendation dated 29/09/2022 to 03/11/2022 by Poliklinik Intan (RZ Intan Medicatre Sdn Bhd). A total of 24 workers were examined and result indicates that 15 have normal hearing, 9 workers with abnormal audiogram, 3 workers with Hearing Impairment and 2 of them fall under Standard Threshold Shift(STS). Further examination by OHD has been conduct and report was available.</li> <li>6. Workplace Inspection has been conducted on monthly basis. Latest record sighted on 24/09/2022</li> </ol> <p>Swee Lam Estate</p> <ol style="list-style-type: none"> <li>1. The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 29/10/2022. Sample check on the HIRARC Loading, Gardening and Premix.</li> <li>2. Chemical Hazard and Risk Assessment (CHRA) has been conducted on 20/03/2019 by ENV Consultancy &amp; Monitoring Services Sdn Bhd with report reference number HQ/04/ASS/00/193-2019/016.</li> </ol>	
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**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> <li>3. Medical Surveillance has been conducted on 25/08/2022 by Klinik Renggam Kluang. A total of 9 workers were examined and the results were all workers are certified as fit to work.</li> <li>4. Noise Risk Assessment (NRA) has been conducted on 17/06/2020 by ETOSH Consult &amp; Engineering Plt. with report reference number HQ/LPROYKPEB/20/00158.</li> <li>5. Audiometric test has been conducted as per NRA recommendation dated 13 – 22/07/2022 by Poliklinik Intan (RZ Intan Medicatre Sdn Bhd). A total of 7 workers were examined and result indicates that 5 have normal hearing, 2 workers with abnormal audiogram, 2 workers with Hearing Impairment and 1 of them fall under Standard Threshold Shift(STS). Further examination by OHD has been conduct and report was available.</li> <li>6. Workplace Inspection has been conducted on monthly basis. Latest record sighted on 06/10/2022</li> </ol> <p>Unijaya Estate</p> <ol style="list-style-type: none"> <li>1. The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 29/10/2022. Sample check on the HIRARC Workshop and Clinic.</li> <li>2. Chemical Hazard and Risk Assessment (CHRA) has been conducted on 08/04/2019 by ENV Consultancy &amp; Monitoring Services Sdn Bhd with report reference number HQ/04/ASS/00/193-2019/034.</li> </ol>	
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**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

		<p>3. Medical Surveillance has been conducted on 12/05/2022 by Poliklinik Intan (RZ Intan Medicatre Sdn Bhd). A total of 7 workers were examined and the results were all workers are certified as fit to work.</p> <p>4. Noise Risk Assessment (NRA) has been conducted on 04/03/2022 by ETOSH Consult &amp; Engineering Plt. with report reference number HQ/LPROYKPEB/22/00694.</p> <p>5. Audiometric test has been conducted as per NRA recommendation dated 29/09/2022 to 05/10/2022 by Poliklinik Intan (RZ Intan Medicatre Sdn Bhd). A total of 13 workers were examined and result indicates that 7 have normal hearing, 4 workers with abnormal audiogram, 1 workers with Hearing Impairment and 1 of them fall under Standard Threshold Shift(STS). Further examination by OHD has been conduct and report was available. Re test has been conducted on 12/10/2022</p> <p>6. Workplace Inspection has been conducted on monthly basis. Latest record sighted on 11/11/2022</p> <p>Pamol Timur Estate</p> <p>1. The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, HIRARC is subject for a review in event of the following Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. Latest reviewed was conducted on 29/10/2022. Sample check on the HIRARC Harvesting, Spraying and Manuring.</p> <p>2. Chemical Hazard and Risk Assessment (CHRA) has been conducted on 22/03/2019 by ENV Consultancy &amp; Monitoring Services Sdn Bhd with report reference number</p>	
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**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

		<p>HQ/04/ASS/00/193-2019/193.</p> <ol style="list-style-type: none"> <li>3. Medical Surveillance has been conducted on 27/09/2022 to 04/11/2022 by Klinik Renggam Kluang. A total of 11 workers were examined and the results were all workers are certified as fit to work.</li> <li>4. Noise Risk Assessment (NRA) has been conducted on 20/06/2020 by ETOSH Consult &amp; Engineering Plt. with report reference number HQ/LPROYKPEB/20/00208.</li> <li>5. Audiometric test has been conducted as per NRA recommendation dated 19/10/2022 to 10/11/2022 by Poliklinik Intan (RZ Intan Medicatre Sdn Bhd). A total of 27 workers were examined and result indicates that 19 have normal hearing, 8 workers with abnormal audiogram, 2 workers with Hearing Impairment and 1 of them fall under Standard Threshold Shift(STS). Further examination by OHD has been conduct and report was available.</li> <li>6. Workplace Inspection has been conducted on monthly basis. Latest record sighted on 02/11/2022</li> </ol> <p>Mitigation Plans and Procedures related H&amp;S Risk was not fully implemented.</p> <p>Pamol POM</p> <p>During site visit at the Shovel operations at the EFB Yard, it was found that the Shovel was without side mirrors, rare view mirror, reverse censor and threadless tyres. HIRARC for Shovel dated 16/02/2022 was reviewed. The risks associated was not adequately monitored.</p> <p>During site visit at the Ramp, it was noticed that 1 tractor driver with registration number JKU 2032 from the estate were wearing rubber shoes as their PPE. It was not in lie with HIRARC Tractor</p>	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>dated 16/02/2022 Existing Control PPE: Topi Keselamatan, Kasut Keselamatan.</p> <p>During site visit at the Boiler, it was found that 1 unit of container was contained with lubricant without any label. It was not in line with CHRA recommendations dated 19/04/2019, 8.1.10 Labelling &amp; Relabelling (Regulation 20 &amp; 21) Containers containing chemical hazardous to Health has to be labelled.</p> <p>Unijaya Estate</p> <p>During site visit at Harvesting area (Motorized Cutter) at PM16B, it was noted that petrol was brought for motorized cutter usage. However, the container was not labelled. Other than that, there were no SDS brought to that area for emergency purpose. It was not inline with CHRA recommendation dated 08/04/2019 8.1.10 Labelling &amp; Relabelling (Regulation 20 &amp; 21) Containers containing chemical hazardous to Health has to be labelled and Section 8.1.13 Provision of SDS In Place Of Work: It shall be kept in a conspicuous place close to each location where chemical is used and be easily accessible to the workers and made available in the National Language and English.</p> <p>Thus, Major NC was raised.</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.</p> <p>- Critical (Major) compliance -</p>	<p>Procedures of Safety Management Plans Pam POM and Estates dated January 2022 has been established. OSH Plan for Mill and estates has been prepared and verified. The training related safety and health has been conducted as per plan. Training need analysis were documented and monitored. The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted. Site visits around the mill and estates indicated the control measures of the HIRARC were followed and ensured by the respective managements. Workplace Inspection has been</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		conducted on monthly basis and the findings were discussed in the Quarterly OSH Meeting.															
<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>	A training programme has been developed and available in the Safety and Health Training Matrix and Training Need Analysis for the Year 2022/2023 – Pamol Palm Oil Mill and Estates. The trainings were sighted to have been sub categorised to trainings on Environmental, GAP, SOP, Social, Traceability, Building & Structure Inspection, SUS Program and Legal Program.	Complied														
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>IOI Pamol POM and estates have established a training program for all workers based on the training need analysis conducted on a yearly basis.</p> <p>Records of trainings were maintained by the estates as below: -</p> <p><u>Pamol POM</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Wildlife Training</td> <td>25/08/2022</td> </tr> <tr> <td>Waste Segregation and Scheduled Waste Training</td> <td>25/08/2022</td> </tr> <tr> <td>Water Quality Index Training</td> <td>03/09/2022</td> </tr> <tr> <td>Water Treatment Plant Training</td> <td>03/09/2022</td> </tr> <tr> <td>Oil Trap Maintenance Training</td> <td>07/10/2022</td> </tr> </tbody> </table> <p><u>Pamol Barat Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> </tbody> </table>	Training	Date	Wildlife Training	25/08/2022	Waste Segregation and Scheduled Waste Training	25/08/2022	Water Quality Index Training	03/09/2022	Water Treatment Plant Training	03/09/2022	Oil Trap Maintenance Training	07/10/2022	Training	Date	Complied
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		Emergency Response Plan Training	05/10/2022	
		Fire Drill Training	05/10/2022	
		First Aid Training	20/09/2022	
		Scheduled Waste Training	29/07/2022	
		Rat Baiting Training	22/10/2022	
		Transport Workers Training	26/04/2022	
		Harvesting Training	20/09/2022	
		<u>Swee Lam Estate</u>		
		Training	Date	
		Oil Trap Maintenance	23/06/2022	
		Waste Segregation & Maintenance	25/05/2022	
		HCV Management Training	16/06/2022	
		Buffer Zone Training	08/04/2022	
		Wildlife Training	25/05/2022	
		Company Policies Training	27/05/2022	
		Payslip and Workers Work Verification	16/02/2022	
		Grievance & Complain Procedure Training	27/05/2022	
		Sexual Harassment & Reporting Procedure	21/04/2022	
		<u>Unijaya Estate</u>		

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

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3.7.3	<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>Supply chain training conducted on 15/09/2022 for 3 persons that has been done by Mr Chua Seng Wei.</p>	Complied																												

**Criterion 3.8:** Supply chain requirement for mills  
 (note: All supply chain requirements are considered as **Critical** ©. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

<p>3.8.1</p>	<p><b>Identity Preserved Module</b>  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.  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  4.1. FFB crop (Goods in)  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>	<p>Complied</p>
<p>3.8.2</p>	<p><b>Mass Balance Module</b>  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 3<sup>rd</sup> 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>Pamol POM is under Identity Preserved. No 3<sup>rd</sup> party crop received by the POM. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>
<p>3.8.3</p>	<p>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&amp;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.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.</p>	<p>Complied</p>



**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Registration of RSPO IT Platform for Pamol POM as per the following:          Commodity: Palm Oil          PalmTrace member ID: RSPO_PO1000000109          RSPO membership ID: 2-0002-04-000-00          Type of business: Oil Mill          Supply chain model: Identity Preserved          Palm trace license valid until 15/3/2023.          Reporting requirements for supply chain verified through RSPO IT platform. Summary of transactions.</p>	Complied
3.8.5	<p>Documented procedures</p> <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>a) 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.</p> <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> <ul 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 5.1. Internal audit             <ul style="list-style-type: none"> <li>a. Handling complaints</li> <li>b. Handling non-conformities</li> <li>c. Handling RSPO products</li> </ul> </li> </ul>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<ul style="list-style-type: none"> <li>d. Downgrading and mass balance traceability</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>   <li>b) Records of FFB, CPO and PK production has been documented in the document " Monthly production records" and sample has been taken for August, September 2022. Other than that, it has been recorded in the document "Summary report- ISCC&amp;RSPO/CSPO Production Monthly Movement"</li> <li>c) Mr Chua Seng Wei, assistant manager has been appointed as RSPO &amp; MSPO Supply chain officer for Pamol Kluang Palm Oil Mill dated</li> </ul>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:               <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>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</li> </ul>	<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, under section 5.1 internal Audit</p> <p>Latest internal audit has been done on 19/10/2022 by sustainability department and there is no nonconformities has been raised for supply chain during the audit.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	review at least annually. The mill shall maintain the internal audit records and reports.		
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>The management only received FFB from certified supplier which is IOI Pamol POM own supply bases.</p> <ul style="list-style-type: none"> <li>i) Sample of weighbridge tickets has been taken for 3 FFB supplier <ul style="list-style-type: none"> <li>a. Pamol Timur Estate  Tickets number: FB19044885  Date 30/08/2022  Tonnage: 7.35mt</li> <li>b. Pamol Barat Estate  Tickets number: FB19044900  Date 30/08/2022  Tonnage: 4.42mt</li> <li>c. Swee Lam Estate  Tickets number: FB19044883  Date 30/08/2022  Tonnage: 34.60mt</li> </ul> </li> </ul> <p>Traceability Identification: RSPO certified FFB (RSPO 547027)  There is no overproduction of certified FFB tonnage received and verified.</p>	Complied
3.8.8	<p>Sales and Goods Out</p> <p>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</p>	<p>CSPO IP module</p> <p>Buyer: IOI Pan-century Edible Oils</p> <p>Seller : IOI Plantations Sdn Bhd</p> <p>Weighbridge tickets: CP19003801</p> <p>Date: 41.35mt</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <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>	<p>Date: 05/10/2022 RSPO Certificate number RSPO 547027</p> <p>CSPO IP module Buyer: IOI Global Services Sdn Bhd Seller : IOI Plantations Sdn Bhd Weighbridge tickets: CP19003713 Tonnage: 32.49mt Date: 03/08/2022 RSPO Certificate number RSPO 547027</p> <p>CSPK Buyer: Pangkor Oil Mill Sdn Bhd Weighbridge tickets: PK19000694 DO Number:C21974 Tonnage: 43.81mt Date: 06/09/2022</p>									
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>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</li> <li>ii) The mill shall ensure the following:             <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> </ul> </li> </ul>	<p>Contractors used for physical handling is only for transporting CPO. List of contractors has been updated in the stakeholders list revision #04. Total 4 for CSPO transporter listed as per below</p> <table border="1" data-bbox="1151 1161 1921 1362"> <tr> <td>1</td> <td>MAKMUR TRANSPORT SDN BHD <b>(CPO TRANSPORTERS)</b></td> </tr> <tr> <td>2</td> <td>SASARAN PERENTAS <b>(CPO TRANSPORTERS)</b></td> </tr> <tr> <td>3</td> <td>SYARIKAT WIJAYA SDN BHD <b>(CPO TRANSPORTERS)</b></td> </tr> <tr> <td>4</td> <td>YEW TAN ENTERPRISE SDN BHD <b>(CPO TRANSPORTERS)</b></td> </tr> </table>	1	MAKMUR TRANSPORT SDN BHD <b>(CPO TRANSPORTERS)</b>	2	SASARAN PERENTAS <b>(CPO TRANSPORTERS)</b>	3	SYARIKAT WIJAYA SDN BHD <b>(CPO TRANSPORTERS)</b>	4	YEW TAN ENTERPRISE SDN BHD <b>(CPO TRANSPORTERS)</b>	<p>Complied</p>
1	MAKMUR TRANSPORT SDN BHD <b>(CPO TRANSPORTERS)</b>										
2	SASARAN PERENTAS <b>(CPO TRANSPORTERS)</b>										
3	SYARIKAT WIJAYA SDN BHD <b>(CPO TRANSPORTERS)</b>										
4	YEW TAN ENTERPRISE SDN BHD <b>(CPO TRANSPORTERS)</b>										

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>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.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>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.</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 30px; text-align: center;">5</td> <td><b>TEO TUAN KWEE (CPO TRANSPORTERS)</b></td> </tr> </table> <p>Agreement for CSPO transporter sighted for contractor Teo Tuan Kwee Sdn Bhd and Yew Tan Enterprise Sdn Bhd dated 01/09/2021  The transporter already sign the Transport Policy stated that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.  Under addendum contract (additional requirements for contractors and service providers) and transport policy/guideline in handling of certified sustainable CPO and PK, it has stipulated the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p>	5	<b>TEO TUAN KWEE (CPO TRANSPORTERS)</b>									
5	<b>TEO TUAN KWEE (CPO TRANSPORTERS)</b>												
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Contractors used for physical handling is only for transporting CPO. List of contractors has been updated in the stakeholders list revision #04. Total 4 for CSPO transporter listed as per below</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 30px; text-align: center;">1</td> <td><b>MAKMUR TRANSPORT SDN BHD (CPO TRANSPORTERS)</b></td> </tr> <tr> <td style="width: 30px; text-align: center;">2</td> <td><b>SASARAN PERENTAS (CPO TRANSPORTERS)</b></td> </tr> <tr> <td style="width: 30px; text-align: center;">3</td> <td><b>SYARIKAT WIJAYA SDN BHD (CPO TRANSPORTERS)</b></td> </tr> <tr> <td style="width: 30px; text-align: center;">4</td> <td><b>YEW TAN ENTERPRISE SDN BHD (CPO TRANSPORTERS)</b></td> </tr> <tr> <td style="width: 30px; text-align: center;">5</td> <td><b>TEO TUAN KWEE (CPO TRANSPORTERS)</b></td> </tr> </table>	1	<b>MAKMUR TRANSPORT SDN BHD (CPO TRANSPORTERS)</b>	2	<b>SASARAN PERENTAS (CPO TRANSPORTERS)</b>	3	<b>SYARIKAT WIJAYA SDN BHD (CPO TRANSPORTERS)</b>	4	<b>YEW TAN ENTERPRISE SDN BHD (CPO TRANSPORTERS)</b>	5	<b>TEO TUAN KWEE (CPO TRANSPORTERS)</b>	Complied
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3.8.11	<p>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.</p>	<p>There was no new outsourcing activity involved in the mill except transporting. All RSPO products processing activities carried out by own. List of transporter listed in the indicator 3.8.10 As per interview with the management, SPO department will contacting CB if there is any new contractors that has been appointed.</p>	Complied										

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

<p>3.8.12</p>	<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> <li>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.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>	<p>There is no changes compare to last year where Pamol POM still compliance with the internal procedure Standard Operating Procedure RSPO Supply Chain – Identity Preserve (IP) dated 31/10/2020 with reference number: RSPOSC/SOP/IP/3.</p> <p>Pamol POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>As per the RSPO Supply Chain – Module: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 2 years’ period. Sampled records of FFB weighbridge tickets and daily production records for last 2 years were still in place for verification.</p> <p>As Pamol POM is operated under IP model, Pamol POM only received FFB from own supply bases. Sample of weighbridge tickets has been taken for different operating units for month March’22, June’22 and September’22</p> <p>The material and products movement on real-time basis is recorded in “Month End Production Report” for both CPO and PK. and has been verified for period December’21 until October’22. The data is summarised in “CPO/PK Mass Balance Calculation (Internal Process &amp; Output for Financial Year XX/YY”. Among the information available in the format is date, FFB processed, OER, CPO amount [opening, produced and closing] and transferred CPO [mill weight, refinery weight].</p>	<p>Complied</p>
<p>3.8.13</p>	<p>Extraction Rate</p> <p>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</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER &amp; KER can be seen in Table 10 of this report.</p>	<p>Complied</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	extraction rates based upon past experience, documented and applied it consistently.		
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Pamol POM has implemented the procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPO SC/SOP/IP/3 Rev: 07 dated 21/09/2020. From the record verification no 3 <sup>rd</sup> party FFB received at in Pamol POM. The FFB source only from supply base under Pamol POM certification unit.	Complied
3.8.16	Registration of Transactions 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. 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.	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. 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. For the period of Nov 2021 to Oct 2022, there were 76 announcements for both CSPO and CSPK	Complied
3.8.17	Claims 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.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has obtained Trademark License from RSPO. The trademark license# is 2-0002-04-000-00 (IOI Corporation Berhad) which is valid from 19/05/2022 to 07/03/2023.	Complied
<b>General corporate communications</b>			

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

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 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	Not Applicable
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address ( <a href="http://www.rspo.org">www.rspo.org</a> ) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. 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 <a href="http://www.rspo.org">www.rspo.org</a> ' where the link must lead to the member's profile page.	No off-product claim made by Pamol POM as to date.	Complied
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 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 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 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



**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

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/PK RSPO IP) and RSPO certificate number; RSPO 547027.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Pamol POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Complied
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Pamol POM is producing crude palm product and containing 100% oil palm content	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Pamol POM is producing crude palm product and containing 100% oil palm content	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 requirements of the RSPO SCCS. In addition, the volume of non-certified	Pamol POM is producing crude palm product and containing 100% oil palm content	Complied

	oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.		
<b>Labelling and trademark (IP)</b>			
	<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>	Pamol POM is producing crude palm product and does not involved in any labelling of end product	Complied
<b>Messaging (IP)</b>			
	<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> <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> </ul>	Pamol POM is producing crude palm product and does not involved in any labelling of end product	Complied

	<ul style="list-style-type: none"> <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>		
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<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 to respect human rights is contained in IOI Group’s Sustainable Palm Oil Policy revised in October 2020. This Policy states that the Company respects and uphold the rights of all workers, including contract, temporary and migrant workers as well as protecting human rights defenders against threats and retaliation in accordance with the following:</p> <ol style="list-style-type: none"> <li>Universal Declaration of Human Rights</li> <li>International Labour Organization’s core conventions</li> <li>United Nations Guiding Principles on Business and Human Rights</li> <li>Principles of Free and Fair Labour in Palm Oil Production.</li> </ol> <p>The Policy was communicated to stakeholders during stakeholder meetings on 14/10/2022 for all operating units and for all workers during the morning briefing.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>No evidence of any use of violence or the instigation of violence within the Pamol Kluang Mill and its supply base was observed. This was verified during interviews with external stakeholders and security forces.</p>	Complied
<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			
4.2.1	<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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Pamol Kluang POM and its supply base are bound by IOI’s Standard “Grievance Procedure (Section 7.0)”.</p> <p>The grievance procedure includes the mechanism of receiving, recording and addressing any complaints/grievances from affected parties. The procedure states that response would be given within</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>- Critical (Major) compliance -</p>	<p>24 hours, which would be followed by preliminary investigation within 30 working days from grievance submission date. If the complaint remains unresolved, parties go to Stage 3 where further investigation/meeting with complainant would be held within 10 working days after preliminary investigation outcome. If matter remains unresolved, it would be escalated to the Group Head Sustainability</p> <p>IOI Group also adopts the United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labour in Palm Oil Production. Part of this document affirms that the legitimate and peaceful activities of Human Rights Defenders are not obstructed. Whistle blowers are protected under the IOI Group’s Whistle Blowing Policy (Revised October 2019). The Policy ensures anonymity of complainants or whistle blowers.</p> <p>Every unit within the Pamol POM and its supply base keep a Grievance/Complaints Book (also known as Green Book) which is readily accessible at the office and can be filled in by workers, staff and external stakeholders. Based on the entries in the Green Book, evidence was available that grievances were acted upon in a timely an appropriate manner.</p>	
<p>4.2.2</p>	<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>Communication of the SOPs has been done to all the workers at each operating units during morning muster call and during the stakeholder’s consultation for all stakeholders. It has been confirmed that all workers aware with the process on how to lodge any complaint.</p> <p><u>Pamol POM</u></p> <p>Training for complaint procedure for all POM workers has been done on 15/09/2022</p>	<p>Complied</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p><u>Pamol Barat Estate</u>          Communication of the procedure has been done to all workers during morning muster call on 31/01/2022</p> <p><u>Unijaya Estate</u>          Communication of the procedure has been done during muster call on 15/02/2022 for all the workers</p> <p>Base on interview with the workers, it has been confirmed that all workers understand the procedure and able to explain the process to lodge any complaint.</p>	
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><u>Pamol Barat Estate</u>          Latest complaint received on 28/04/2022 and 18/08/2022. The complaint is related to harvesting tools and workers housing. There is evidence that complaint has been responded within the time line.</p> <p><u>Pamol Timur Estate</u>          2 complaint sample as per below</p> <ol style="list-style-type: none"> <li>a. Request to increase of transfer limit in mechantrade systems on 08/06/2022 and responded on the same day.</li> <li>b. To repair road at camp 15 workers housing on 10/9/2022, repair has been done 13/09/2022</li> </ol> <p><u>Unijaya Estate</u>          There is evidence that the estate management responded to each complaint received. Sample has been taken for complaint date 10/10/2022</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>a. 1 worker complaint on the clogged toilet at his house and the management has repaired the toilet on 13/10/2022</p> <p>b. 1 worker complaint regards to Mechantrade systems where he unable to transfer certain amount of money to his family in Indonesia. The management has assist to change the transaction limit on the same day.</p>	
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>The conflict resolution mechanism is contained in IOI Corporation Berhad Grievance Procedure (Doc Ref.: IOI/P/GP/001 Rev No. 1 Rev Date 20 Jan 2020). This procedure allows aggrieved parties to have access to information, advice and expertise.</p>	Complied
<p><b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
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>IOI Group has developed contribution program to local development through Yayasan Tan Sri Lee Shin Chin contribute various program includes education, community welfare, medical assistance natural disaster, social enterprise and promotion of Science, Technology, Engineering and Mathematics (STEM). The program display in IOI Group website at <a href="http://yayasan.ioigroup.com">yayasan.ioigroup.com</a> and internal news of 'Berita IOI' with latest issue no.: 95 (Jul – Sep 2022).</p> <p>IOI Group has advertised job vacancy to local community surrounding by displayed at MyFuture Jobs, Facebook page, Instagram Page and Tiktok Page dated 01/10/2022.</p> <p>Other than that, for each operating units, sighted contribution has been done to workers such as donation of chicken during Eid Fitri dated 29/04/2022 and contribution of meat on 08/07/2022 during Eid Adha.</p> <p>Consultation with local communities has been conducted for all operating units through email and memo which has been sent to all</p>	Complied

		<p>stakeholders and queries if there any contribution required. However, there is no contribution required at the time of consultation. It has been confirmed through interview with stakeholders, that contribution is upon request and stakeholders able to demonstrate the consultation and communication procedure for IOI Group Berhad</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>Below are the details of legal land ownership:  <u>Pamol POM</u>          located within the land title of Pamol Timur Estate under land title No. 88881.</p> <p><u>Pamol Barat Estate</u></p> <table border="1" data-bbox="1137 858 1924 1238"> <thead> <tr> <th>Land title no.</th> <th>Date of land title</th> <th>Land usage</th> <th>Lot Number</th> <th>Area</th> </tr> </thead> <tbody> <tr> <td>HSD 790</td> <td>02/02/1970</td> <td>Agriculture</td> <td>9227</td> <td>22.87</td> </tr> <tr> <td>HSD 791</td> <td>02/02/1970</td> <td>Agriculture</td> <td>9228</td> <td>67.05</td> </tr> <tr> <td>HSD 73767</td> <td>19/03/2014</td> <td>Agriculture</td> <td>89116</td> <td>36.09</td> </tr> <tr> <td>G56272</td> <td>31/03/1997</td> <td>Agriculture</td> <td>1877</td> <td>2050.21</td> </tr> <tr> <td>G94673</td> <td>15/05/2006</td> <td>N/A</td> <td>2589</td> <td>20.36</td> </tr> <tr> <td>G88885</td> <td>30/11/2002</td> <td>Agriculture</td> <td>2430</td> <td>160.18</td> </tr> </tbody> </table> <p><u>Pamol Timur Estate</u>          There is 6 land title verified for Pamol Timur Estate. Details as per below</p>	Land title no.	Date of land title	Land usage	Lot Number	Area	HSD 790	02/02/1970	Agriculture	9227	22.87	HSD 791	02/02/1970	Agriculture	9228	67.05	HSD 73767	19/03/2014	Agriculture	89116	36.09	G56272	31/03/1997	Agriculture	1877	2050.21	G94673	15/05/2006	N/A	2589	20.36	G88885	30/11/2002	Agriculture	2430	160.18	<p>Complied</p>
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

Land title no.	Date of land title	Land usage	Lot Number	Area
G88881	30/11/2002	Agriculture	2429	4.10
G90779	25/11/2002	Agriculture	2953	396.79
G90780	25/11/2002	Agriculture	2594	407.32
G94673	15/02/2006	Agriculture	2589	839.60
G88885	30/11/2002	Agriculture	2430	647.98
G56272	31/03/1997	Agriculture	1877	7.31

Unijaya Estate  
 For Unijaya Estate, there are total 152 land titles for total land area 1260.50 Ha. Sample of land title has been taken and details as per below

- a. Lot 1767 total 4.7475 ha freehold status condition agriculture (rubber) Pamol Plantation Berhad
- b. Lot 1806 total 3.5815 ha freehold status condition agriculture (rubber), Pamol Plantation Berhad
- c. Lot 3271 total 0.9232 Ha freehold status condition agriculture (rubber), Pamol Plantation Berhad
- d. Lot 3267 total 0.6844 Ha freehold status condition agriculture (rubber), Pamol Plantation Berhad
- e. Lot 3253 total 1.2469 Ha freehold status, condition agriculture (rubber), Pamol Plantation Berhad

Application to change permitted land usage sighted from the letter send and received on 03/08/2022 by Pejabat Tanah



		Kluang dated 01/08/2022 and still in progress.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no evidence of any use local community land that requires negotiations or agreements detailing FPIC processes. Details of the land ownership are as per Indicator 4.4.1 above. All palms that has been planted has entered 2 <sup>nd</sup> cycle of planting. Therefore, this indicator is not applicable.	Not Applicable
4.4.2a	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. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
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 evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
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 evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
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 involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no evidence of any local community land that requires maps of appropriate scale showing extent of recognized legal, customary or user rights affected local communities. Therefore, this indicator is not applicable.	Not Applicable

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	All available relevant documents are as per details in Indicator 4.4.1 which show legal ownerships of each operating units above. There is no land conflict involved and no proposed benefit sharing nor legal arrangements. All palms that has been planted has entered 2 <sup>nd</sup> cycle of planting. Therefore, this indicator is not applicable.	Not Applicable
4.4.5	<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. - Critical (Major) compliance -	There is no evidence of any local community land involved and so this indicator is not applicable.	Not Applicable
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 evidence of any local community land involved and so this indicator is not applicable.	Not Applicable
<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 -	Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. The land planted with oil palm are state lease land taken over from Unilever. No Customary land was involved.	Not Applicable
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. - Critical (Major) compliance -	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable
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	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>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.</p> <p>- Minor compliance -</p>		
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.6	<p>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.</p> <p>- Minor compliance -</p>	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable

	- Critical (Major) compliance -		
<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 -	The procedure for identifying legal, customary or user rights, and procedure for identifying people entitled to compensation are available the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.	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 -	The procedure for calculating and distributing fair compensation (monetary or otherwise) is available the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.	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 -	There is no scheme small holdings that supply FFB to IOI Pamol Kluang POM.	Not Applicable
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. - Minor compliance -	The process and outcomes of any negotiated agreements, compensation and payments in the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. There is no compensation has been paid since all lands under Pamol Kluang POM has their own legal ownership as per land title provided.	Complied
<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.	The procedure for identifying people entitled to compensation is available in the Grievance Procedure For Land Owners.	Complied

	- Critical (Major) compliance -		
4.7.2	<p><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.</p> <p>- Critical (Major) compliance -</p>	The procedure for calculating and distributing fair compensation (monetary or otherwise) is available in the Grievance Procedure For Land Owners.	Complied
4.7.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The process and outcomes of any negotiated agreements, compensation and payments in the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. There is no compensation has been paid since all lands under Pamol Kluang POM has their own legal ownership as per land title provided.</p> <p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	Complied
<p><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.</p>			
4.8.1	<p>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.</p> <p>- Minor compliance -</p>	<p>The process and outcomes of any negotiated agreements, compensation and payments in the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. There is no compensation has been paid since all lands under Pamol Kluang POM has their own legal ownership as per land title provided.</p> <p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	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>The process and outcomes of any negotiated agreements, compensation and payments in the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. There is no compensation has been paid since all lands under Pamol Kluang POM has their own legal ownership as per land title provided.</p> <p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</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>The process and outcomes of any negotiated agreements, compensation and payments in the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. There is no compensation has been paid since all lands under Pamol Kluang POM has their own legal ownership as per land title provided.</p> <p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</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>The process and outcomes of any negotiated agreements, compensation and payments in the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. There is no compensation has been paid since all lands under Pamol</p>	Complied

		<p>Kluang POM has their own legal ownership as per land title provided.</p> <p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
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>Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.</p>	Not Applicable
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).</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.</p>	Not Applicable
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.</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.</p>	Not Applicable
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.</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.</p>	Not Applicable

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
5.1.6	<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 -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
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 -	Evidence was available that the weighbridges at the Pamol Kluang Palm Oil Mill is being calibrated annually by an independent third party. Refer latest inspection has been conducted by Metrology Corporation Malaysia Sdn Bhd dated 30/06/2022 to the weighbridge with serial number B1742879. Safety sticker:2.1KQ027283.	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 -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
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 -	Documented procedures for dealing with any substantive and procedural complaints and grievances relating to stakeholders is based on IOI group procedure, Grievance Procedure, dated 20/01/2020.	Not Applicable
<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.	Pamol Kluang Mill is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable



	- Minor compliance -		
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 -	Pamol Kluang Mill is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Pamol Kluang Mill is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Pamol Kluang Mill is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Pamol Kluang Mill is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable
<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 -	A Policy entitled Equal Opportunity Employment and Freedom of Association Policies is available and displayed at the main notice boards and at the workers' housing. The Policy states that there will be no discrimination based on race, national origin, religion, gender, union membership and age. Interviews held with local and foreign workers (both male and female) at all units in Pamol Kluang Mill, confirmed that there is no form of discrimination. The workers	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		confirmed that they were given equal employment opportunities and are able to enjoy all the benefits and use of amenities accorded by the Company.	
6.1.2	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews with workers at Pamol POM, Pamol Barat Estate, Pamol Timur Estate, Unijaya Estate and Swee Lam Estate documents sighted and observations made, there is no evidence that there has been any form of discrimination against any local or foreign employees.</p> <p>Review of pay checks and employment contracts also confirm that all workers irrespective of nationalities, gender, religion, etc are accorded the same employment terms and receive the same wages for the same scope of work.</p> <p>All foreign workers sampled confirmed that they enjoy the same benefits and amenities e.g., housing.</p> <p>There is also no evidence of recruitment fee has been imposed on any of the workers sampled. As per verification, the system that has been established since last year is effective to ensure that there is no discrimination in each operating units of Pamol Kluang POM and supply bases.</p>	Complied
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Pamol POM, Pamol Barat Estate, Pamol Timur Estate, Unijaya Estate and Swee Lam Estate were able to demonstrate that the recruitment selection, hiring and access to training were based on skills, capabilities and medical fitness. Each worker filled up a job application form attaching copies of NRIC, qualification and previous work experience. The Manager then assessed their respective suitability to the job vacancy and recorded this in the application form. The workers also attended an orientation and induction training to familiarize them with their work in IOI.</p>	Complied

		<p>Sample of workers has been taken by auditor for verification          Malaysian : 4 workers          Pamol Barat Estate: 2 field workers from Nepal          Swee Lam Estate: 2 field workers from India.</p> <p>Sighted that interview has been conducted at the origin country by the management and has been recorded. Sighted also that both workers has signed employment contract. Further interview verified the process of recruitment and they can demonstrate their understanding on the employment contract.</p> <p>While for training, there is evidence that all workers has been provided with training prior to start works base on types of works of each workers. There is promotion for each operating units. Medical check up has been conducted annually for foreign workers for permit renewal and workers that handling chemical.</p>	
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Sighted declaration of acceptance for each operating either agreed to be tested or not in the document "Guidelines on reproductive health". For Pamol Barat Estate, sighted 4 samples of workers that signed which disagree to be tested.</p>	Complied
6.1.5	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>The gender committees at Pamol Kluang Mill, are known as the Women Empowerment Committees (WEC). The WEC consists of all female employees, and wives of workers are also invited to join their activities.</p> <p>Review of meeting minutes and interviews held with WEC members confirmed that the WEC also provide awareness to its members on issues of concern such as sexual harassment, domestic violence, how complaints are lodged, and who to complaint to.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>The WEC also discussed issues such as health and improvements for its members.</p> <p><u>Pamol POM</u></p> <p>Meeting for women has been done and minutes meeting sighted title Mesyuarat Jawatankuasa Pemerkasaan Wanita (WEC) done on 16/05/2022 and 19/09/2022</p> <p><u>Pamol Barat Estate</u></p> <p>Minutes meeting for gender committee sighted and latest on 24/12/2021 and 28/06/2022 and documented in document title "Mesyuarat Jawatankuasa Pemerkasaan Wanita"</p> <p><u>Unijaya Estate</u></p> <p>Women empowerment committee (WEC) has been established by the management and sighted latest meeting conducted on 18/05/2022 with attendance of all female staff. There is one female general workers absent for the meeting. Communication of the women related policy has been done during the meeting and there is no issues has been highlighted.</p> <p><u>Pamol Timur Estate</u></p> <p>Latest gender committee meeting conducted on 18/11/2021 and 28/06/2022 with attendance of all female staff and workers.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>All units within Pamol POM and its supply base were able to demonstrate evidence of equal pay for the same work scope where all units pays the workers paid base accordance with minimum wages order 2022 of RM57.69per day per person. The SOP for Minimum Wages for estate Field/General Worker and Harvesters</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		has been fixed irrespective of gender and nationality. This was demonstrated by comparing sampled employment contracts and pay slips for sample workers for each operating units	
<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).			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	Collective agreement between IOI Group of companies and national union of plantation workers (NUPW) for Palm Oil Mill Employees, 2020 registered 09/03/2020 valid until December 2022 reference number COG. NO: 057/2020. Other than all operating units complies with Minimum Wage Order 2022 at rate RM1500/months, RM57.69/day or RM7.21/hour	Complied
6.2.2	<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 compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Employment contracts signed between the estate/mill management detail out terms of employment and payment. These include regular working hours, statutory deductions, duration of employment, wages payable, working hours, medical benefits including medical leave entitlement, annual leave entitlement, mutual termination of service, etc. All the contracts sampled were still current. Sample of workers has been taken as per below</p> <ul style="list-style-type: none"> <li>• Pamol Barat : 12 contracts</li> <li>• Pamol Timur : 12 contracts</li> <li>• Pamol POM: 10 contracts</li> <li>• Swee Lam Estate: 10 contracts</li> <li>• Unijaya Estate: 10 contracts</li> </ul>	Complied
6.2.3	<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>	For all operating, stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on length of services. For workers less than 2 years services, entitled 14 days of sick leave and 8 days of annual leave. Highlighted in the	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		contract reasons for dismissal, period of notice and other legal labour requirements.	
6.2.4	<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>Pamol Kluang Mill, provide adequate housing for all its workers. Each line site has sanitation facilities, water supplies either from its own source or from Syarikat Air Johor (Pamol Kluang Mill). Provided in accordance with the Employees’ Minimum Standard of Housing, Accommodation and Amenities Act 1990 in terms of adequate water and electricity supplies, surrounding maintenance and cleanliness, free flowing drains, provision of estate clinics attended by registered health assistants, fortnightly VMO visits, and weekly housing inspections.</p> <p><u>Pamol Barat Estate</u>  Line site inspection sighted done by VMO, Dr Helen Tan Kwai. Sample taken for 12/11/2022, 17/11/2022 and 29/10/2022</p> <p><u>Unijaya Estate</u>  Line site inspection sighted done by Hospital Assistant, Madam Norfadillah binti Abdul Rahman. Sample taken dated 03/11/2022. 09/11/2022. 17/11/2022 and 23/11/2022</p> <p><u>Pamol Timur Estate</u>  Line site inspection 03/11/2022, 11/11/2022, 18/11/2022 and 24/11/2022 done by hospital assistant, Mdm S Yogeshri.</p>	Complied
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 Barat Estate, Pamol Timur Estate and Pamol POM located nearby to Simpang Empat town which cost the workers around RM1.80/ways. Other than that there is 2 sundry shops, which is in Pamol Timur Estate and Pamol Barat Estate.</p>	Complied

		<p>Monitoring of the pricing at the sundry shops has been done by the management of Pamol Barat Estate and sighted in the document Kedai Runcit Mariayee, Price list of item (Senarai Harga Barang). Comparison between other sundry shop also been done by the estate management to ensure that the price is affordable by the workers.</p> <p>While for Swee Lam Estate, it located nearby the Kulai town with around 5 minutes travelling by bus. One sundry shop open inside the estate, Kedai Runcit Lim Mou. Comparison of price has been done with sundry shop outside the estate on 27/07/2022 and there is no significant difference of price.</p>	
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>          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>For Pamol POM and its supply base, the calculation of DLW took into account food, housing, non-food non-housing (medical, amenities).</p> <p>The net living wages is calculated at RM1,637.26 and the gross DLW (after adding SOCSO, income tax, Employee Insurance Scheme payments), is calculated at RM1,850.00.</p> <p>The minimum wages for the workers is RM1,500 per month, and total average workers received is RM1,965 which is highted than living wages and minimum wages</p>	Complied

	<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 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).</i></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>		
<p>6.2.7</p>	<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 estates and mill employ full-time employees, and based on records reviewed and interviews conducted, there are no casual, temporary and day labour employed within Pamol POM and its supply base.</p>	<p>Complied</p>



<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>			
<p>6.3.1</p>	<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.            - Critical (Major) compliance -</p>	<p>The statement recognizing freedom of association and the right to collective bargaining is available in the IOI’s Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). In this document, IOI commits to uphold the rights to freedom of association and recognize the right to collective bargaining and allow trade unions to have access to all workers.            This was explained to all workers during Policy trainings conducted during the morning muster call.</p>	<p>Complied</p>
<p>6.3.2</p>	<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.            - Minor compliance -</p>	<p>The JCCs comprise workers’ representatives and management representatives. They discuss issues raised by the workers in a meeting called Employees’ Consultative Committees (ECC). Evidence was available to show that the workers’ representatives have been freely chosen by the workers themselves via an election process. Workers’ representatives have been chosen to represent their nationalities, as confirmed during audit interviews.            Sampled during the audit were Joint Consultative Committees (JCCs) meeting minutes attended by worker representatives, and management team held as follows:   <u>Pamol POM</u>            Meeting with workers representative sighted and sample has been taken for meeting done 07/07/2022, 01/10/2022 with attendance all representative from workers from different origin.</p>	<p>Complied</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p><u>Pamol Barat Estate</u>          There is evidence that 1 workers has been registered under NUPW and meeting with NUPW has been done 15/11/2022 to brief on the process to apply for memberships. Minutes meeting sighted for workers unions during the JCC meeting latest conducted on 31/10/2022 with attendance of representative from different origin (Bangladesh, Indonesia, Nepal, Local).</p> <p><u>Swee Lam Estate</u>          There is evidence that 4 workers has been registered under NUPW. Minutes meeting sighted for workers unions during the JCC meeting latest conducted on 11/08/2022, 09/06/2022, 13/10/2022 with attendance of representative from different origin (Local, Bangladesh, Indonesia, Nepal workers).</p> <p><u>Unijaya Estate</u>          JCC meeting has been conducted on with attendance of all workers representative dated 15/02/2022,11/04/2022, 22/06/2022, 22/08/2022 and 12/10/2022</p> <p><u>Pamol Timur Estate</u>          JCC meeting has been conducted on with attendance of all workers representative dated 25/08/2022, 21/06/2022, 08/10/2022</p>	
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>There is evidence that management did not interfere with the formation and selection of workers representative that can be sighted through election evidence records. It has been confirmed through interview with the workers representative, that there is no</p>	Complied

		<p>interference by the management in selection of the workers representative</p> <p><u>Pamol POM</u>  Election done 18/09/2022 on 18/09/2022 for representative for Myanmar, India, Nepal and Malaysia.</p> <p><u>Pamol Barat Estate</u>  There is evidence that the management of Pamol Barat Estate did not interfere with the formation of the unions and selection of representative. It has been confirmed through interview and documentation for election that has been done. Election done 29/09/2022 to select representative for local, Bangladesh, Indonesia, India and Nepal workers.</p> <p><u>Swee Lam Estate</u>  Election for the workers representative has been done on 31/01/2022 for Indonesian, Indian, Bangladeshi and Nepalese.</p> <p><u>Unijaya Estate</u>  Election for workers representative has been done without interference of the estate management and has been confirmed through interview with the workers. Election done on 29/09/2022 base on the origin of the workers.</p> <p><u>Pamol Timur Estate</u>  Election has been done on 31/10/2022 for Pamol Timur Estate.</p>	
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Criterion 6.4: Children are not employed or exploited.			
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>The Policy for the protection of children, including the prohibition against child labour is available in IOI's Sustainable Palm Oil Policy. This Policy also pledges to eliminate all forms of child labour.</p> <p>Contracts signed between Pamol Kluang Mill and the Estates contain an undertaking by the respective contractors that they shall not recruit any person below the age of 18. Clause d of the Additional Requirements For Contractors and Service Providers states that the contractors' workers must at least be 18 years old when employed. Sighted were contracts signed as follows:</p> <p>Pamol POM</p> <ol style="list-style-type: none"> <li>1. Contract Agreement between Yewtan Enterprise Sdn Bhd with Pamol POM, Type of work: Transport CPO to Refinery from 01/09/2021 to 30/06/2024, dated 01/09/2022.</li> <li>2. Contract Agreement between Tuan Kwee Sdn Bhd with Pamol POM, Type of work: Transport CPO to Refinery from 01/09/2021 to 30/06/2024, dated 01/09/2022.</li> </ol> <p>Pamol Barat Estate</p> <ol style="list-style-type: none"> <li>1. Contract Agreement: Sasaran Emas Plt Contract No: PBE/001-22/23 dated 01/07/2022, Type of work: Transport FFB to Pamol Mill. Validity: 01/09/2022 to 30/08/2025.</li> <li>2. Contract Agreement: Tanjong Emas Construction. Contract No: PBE/002-22/23 dated 01/10/2022, Type of work: JCB Sundry Work. Validity: 01/10/2022 to 30/09/2023.</li> </ol> <p>Swee Lam Estate</p> <ol style="list-style-type: none"> <li>1. Contract Agreement between Sasaran Pentas Bhd with Swee Lam Estate, Type of work: Transport FFB to Pamol Kluang POM</li> </ol>	Complied

		<p>from 01/09/2022 to 31/08/2025, dated 19/09/2022.</p> <p>2. Contract Agreement: Nice Brother Sdn Bhd. Contract No: SLE/004-22/23 dated 01/07/2022, Type of work: JCB Sundry Work. Validity: 01/07/2022 to 30/06/2023.</p> <p><u>Pamol Barat Estate</u></p> <p>a. Contract number PMM/002-22/23, Rama Plantation and Transportation</p> <p>b. Contract number PBE/001-22/23, Sasaran Emas PLT</p> <p><u>Swee Lam Estate</u></p> <p>a. Contract Agreement between Sasaran Pentas Bhd with Swee Lam Estate, Type of work: Transport FFB to Pamol Kluang POM from 01/09/2022 to 31/08/2025, dated 19/09/2022.</p> <p>b. Contract Agreement: Nice Brother Sdn Bhd. Contract No: SLE/004-22/23 dated 01/07/2022, Type of work: JCB Sundry Work. Validity: 01/07/2022 to 30/06/2023.</p> <p><u>Unijaya Estate</u></p> <p>a) Contract Agreement: Tanjung Emas Construction. Contract No: UJE/007-22/23 dated 01/09/2022, Type of work: JCB Sundry Work. Validity: 01/09/2022 to 30/08/2023.</p> <p>b) Contract Agreement: Murarvin Enterprise Sdn Bhd. Contract No: XXXXXX dated 01/05/2021, Type of work: FFB Transport To Mill. Validity: 01/05/2021 to 30/04/2024.</p> <p><u>Pamol Timur Estate</u></p> <p>a. Contract Agreement: Chandran A/L A.Sinniah. Contract No: PTE/002-22/23 dated 01/07/2022, Type of work: Loading and Transport FFB Work. Validity: 01/07/2022 to 30/06/2022.</p>	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		b. Contract Agreement: Jayakumar Maju Enterprise. Contract No: PTE/003-22/23 dated 01/07/2022, Type of work: FFB Transport To Mill. Validity: 01/07/2022 to 30/06/2022.	
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>Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Pamol POM and supply base.</p> <p>Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job. Visit to the linesite and field also did not reveal any persons under 18 years old working.</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 evidence that any young persons were employed in at Pamol POM and its supply base as evidenced from documentation review, field observations, line site observations and audit interviews.</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 IOI Sustainability Policy which pledges to eliminate all forms of child labour is displayed at prominent places near the office and workers' housing. Based on the documents sighted, communication about its no child labour policy were communicated to all levels of employees as evidenced from training records held as follows:</p> <ol style="list-style-type: none"> <li>a. Communication of the companies' policy has been done during the stakeholders consultation on 14/10/2022 for all operating units for all external stakeholder</li> <li>b. Communication for internal stakeholders in Pamol POM has been on 11/10/2022</li> <li>c. Communication for internal stakeholder done in Pamol Barat Estate on 03/10/2022 with attendance of representative from Masjid, Temple, sundry shops and contractors</li> </ol>	Complied

		<p>d. While for Swee Lam Estate, communication of the procedure has been done during the stakeholders consultations dated 05/08/2022 and 23/08/2022</p> <p>e. For Unijaya Estate, communication of the policies has been done during the internal stakeholders dated 04/10/2022</p> <p>f. For Pamol Timur Estate, communication of the procedure has been done during the stakeholders consultations on 04/11/2022</p>	
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<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.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment is contained in IOI’s Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). This document states that the Company will promote a safe and healthy working environment that is free from sexual harassment and other hazards. In addition, IOI also has a policy known as Policy on Harassment at Workplace. Based on interviews with members of the Women’s Empowerment Group and other workers, these Policies are being implemented and communicated to all levels of workforce during Policy trainings conducted as follows:</p> <p>Pamol POM</p> <p>Communication of the policy done to all workers, sample taken on 28/05/2022 and 15/09/2022</p> <p>Sexual harassment procedure has been communicated on 10/10/2022 for male workers.</p>	Complied
6.5.2	<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.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment is contained in IOI’s Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). This document states that the Company will protect reproductive health of women employees.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>This Policy is being implemented based on interviews held with women employees who are not prohibited from planning their families, are entitled to 3 months paid maternity leave, and women employees who are exposed to chemicals would be re-assigned to another job once she is confirmed pregnant.</p> <p>This Policy were communicated during Policy trainings conducted as follows:</p> <p>Pamol POM</p> <p>Communication of the policy done to all workers, sample taken on 28/05/2022 and 15/09/2022</p> <p>Sexual harassment procedure has been communicated on 10/10/2022 for male workers.</p>	
<p>6.5.3</p>	<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><u>Pamol POM</u></p> <p>New mother assessment has been done by the management using assessment form "New mothers' consultation form" latest on 08/10/2021 for Mdm Norazlin binti Mohamaed. There is no special request from the new mother.</p> <p><u>Pamol Barat Estate</u></p> <p>There is no new mother at Pamol Barat Estate</p> <p><u>Unijaya Estate</u></p> <p>There is one new mother in Unijaya Estate which is Ms Norfadillah binti Abd Rahman documented in "Pregnancy consultation form" dated 23/09/2022. There is no special request by the new mother and has been confirmed through interview.</p> <p><u>Pamol Timur Estate</u></p>	<p>Complied</p>



		New mother assessment conducted for one office staff on 22/08/2022 by Mdm Anida Othman, chairperson for gender committee. There is no special request by the new mother.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	IOI Corporation Berhad has a Grievance Procedure dated 20/1/2020. Para 4 states that the Company commits to safeguard all stakeholders involved in the grievance process against potential threats, intimidation, violence or reprisals. Furthermore, the grievance mechanism support with Whistleblowing Policy revised on October 2019. Para 4.0 stated that the complainants may choose to remain anonymous when reporting on the particular grievance). The IOI Sustainability Policy is also displayed at prominent places near the office and workers' housing. This Policy were communicated during Policy trainings conducted during the morning mustercall  Additionally, IOI has also printed posters in various languages Interviews conducted with workers also confirmed their understanding of the grievance mechanism.	Complied
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited: <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> </ul>	Based on interviews with the workers, and observations made, the following were found:  Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Bangladeshi and Indonesian workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house.	Complied

	<ul style="list-style-type: none"> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Charging of recruitment fee: Workers are not charged any recruitment fees. This is clearly stated in the contracts IOI has with its recruitment agents from both from Indonesia and India. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees.</p> <p>Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free decline any offers for overtime work. Sighted were written consent from workers to work overtime for Pamol Kluang Mill</p> <p>Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers</p> <p>Debt bondage: There is no evidence of any incidence of debt bondage. vi. Withholding of wages: There is no evidence of withholding of wages.</p>	
6.6.2	<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>A specific labour policy and/or procedures for migrant workers are available in IOI Plantation Foreign Workers Recruitment Guideline and Procedure signed by the Plantation Director dated October 2017 (Revised July 2018). This Guidelines and Procedure covers the following:</p> <ul style="list-style-type: none"> <li>- No payment of recruitment fee</li> <li>- Pre-employment stages</li> <li>- Arrival of workers</li> <li>- Orientation and induction training</li> </ul>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<ul style="list-style-type: none"> <li>- Health screening</li> <li>- Passport handling</li> <li>- Provision of basic items</li> <li>- Grievance mechanism</li> <li>- Contract renewal, etc.</li> </ul> <p>Based on audit interviews and records sighted, Pamol Kluang Mill and its supply base have demonstrated that the procedures are being implemented.</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 management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health as per Safety Management Plan Section 1.3.4 dated 05/10/2022 stating that Managers of respective units is automatically appointed as ESH Chairman. All correspondence were sighted and verified. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training. Concerns on issue related health, safety and welfare were discussed at these meetings and recorded. The OSH Committee meeting for Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2022 as follows:</p> <table border="1" data-bbox="1137 1257 1930 1383"> <thead> <tr> <th>OSH Meeting 2022</th> <th>Pamol POM</th> <th>Pamol Barat Estate</th> <th>Swee Lam Estate</th> </tr> </thead> <tbody> <tr> <td>1<sup>st</sup> Quarter</td> <td>26/01/2022</td> <td>10/03/2022</td> <td>07/03/2022</td> </tr> </tbody> </table>	OSH Meeting 2022	Pamol POM	Pamol Barat Estate	Swee Lam Estate	1 <sup>st</sup> Quarter	26/01/2022	10/03/2022	07/03/2022	Complied
OSH Meeting 2022	Pamol POM	Pamol Barat Estate	Swee Lam Estate								
1 <sup>st</sup> Quarter	26/01/2022	10/03/2022	07/03/2022								

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<table border="1"> <tr> <td>2<sup>nd</sup> Quarter</td> <td>14/04/2022</td> <td>22/06/2022</td> <td>17/06/2022</td> </tr> <tr> <td>3<sup>rd</sup> Quarter</td> <td>04/07/2022</td> <td>19/09/2022</td> <td>21/09/2022</td> </tr> <tr> <td>4<sup>th</sup> Quarter</td> <td>12/10/2022</td> <td>TBC</td> <td>TBC</td> </tr> </table>	2 <sup>nd</sup> Quarter	14/04/2022	22/06/2022	17/06/2022	3 <sup>rd</sup> Quarter	04/07/2022	19/09/2022	21/09/2022	4 <sup>th</sup> Quarter	12/10/2022	TBC	TBC				
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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 equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The procedures for accident and emergencies has been established. There is formation of ERP Team &amp; ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in the estates and mill. They includes emergencies relating fire, chemical spillage, flood and accident at work place. Refer Flowchart procedure that has been reviwed on 17/10/2022 as below:</p> <ol style="list-style-type: none"> <li>1. Earthquake management plan</li> <li>2. Emergency respond plan for tractor and lorry driver</li> <li>3. Emergency respond plan for chemical</li> <li>4. Emergency respond plan for physical injuries</li> <li>5. Emergency respond plan for fire in POM</li> <li>6. Emergency respond plan for environment- leacheate from EFBP</li> <li>7. Emergency respond plan for environment- spillage of CPO</li> <li>8. Emergency respond plan for environment- schedule waste</li> </ol>	Complied															

**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

9. Emergency respond plan for environment-spillage of effluent.  
The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedure's guidelines were issued by SPO and amended to tailor to the situation differences in the estates and mill.  
The operating units continuously provide training to the workers to ensure the awareness on the ERP. Reviewed the training records as follows:

Estate/ Mill	ERP Training date
Pamol POM	05/09/2022
Pamol Barat Estate	05/10/2022
Swee Lam Estate	23/05/2022
Unijaya Estate	22/07/2022
Pamol Timur Estate	19/10/2022

Procedure for First Aid has been established. Refer SOP Emergency Prevention, Preparedness and Response dated 01/08/2012 with reference number: IOI-OSH 3.3.4.3. The operating provided first aid kit/box and located in designated places or assigned to competent first aider. The operating units has also established an information on the location of first aid box, name and contact no. of the assigned first aider and communicated through briefing, training and displayed on notice board. First aid kit was monitored on monthly basis for estate and quarterly basis for mill. Latest inspection as follows:

Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		Pamol POM	22-23/01/2022	22/10/2022	
		Pamol Barat Estate	20/09/2022	18/10/2022	
		Swee Lam Estate	28/06/2022	17/10/2022	
		Unijaya Estate	04/08/2022	04/11/2022	
		Pamol Timur Estate	22-23/01/2022	21/10/2022	
		<p><u>Pamol POM</u>            Accident records were maintained and updated monthly at the mill. The JKPP 8 form have been submitted for the year ending 2021 on 25/01/2022 with reference number JKPP8/87082/2021. There were 7 accident recorded with 3 days TLA.</p> <p><u>Pamol Barat Estate</u>            Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2021 on 13/01/2022 with reference number JKPP8/87268/2021. There were 20 accidents recorded with 31 days TLA.</p> <p><u>Swee Lam Estate</u>            Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2021 on 12/01/2022 with reference number JKPP8/87065/2021. There were 23 accidents recorded with 56 days TLA.</p> <p><u>Unijaya Estate</u>            Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2021 on 12/01/2022 with reference number JKPP8/87236/2021. There were 15 accidents recorded with 233 days TLA.</p>			

		<p><u>Pamol Timur Estate</u>          Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2021 on 12/01/2022 with reference number JKPP8/79002/2021. There were 46 accidents recorded with 63 days TLA.</p>													
<p>6.7.3</p>	<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 those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.          - Critical (Major) compliance -</p>	<p>Refer PPE Issuance record for the year 2022. The estates and mill provide PPE to the employees such as apron, safety helmets, and safety shoes relevant to the work handled by the workers. Records of PPE issuance for the estate were sighted. During the site visit workers was observed to be in PPE. Based on the HIRARC carried out at the estates/mill the PPE types for the various activities has been identified and implemented.</p> <table border="1" data-bbox="1137 813 1926 1276"> <thead> <tr> <th>Category</th> <th>PPE provided</th> </tr> </thead> <tbody> <tr> <td>Tractor Driver</td> <td>Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.</td> </tr> <tr> <td>Sprayers</td> <td>Respirator, nitrile glove, goggles, wellington boots, apron.</td> </tr> <tr> <td>Manuring</td> <td>Apron, wellington boots, dust mask, nitrile glove.</td> </tr> <tr> <td>Engine Driver (Genset)</td> <td>Safety Helmets, Safety shoes, Earmuff / Ear Plug, Gloves</td> </tr> <tr> <td>Harvester</td> <td>Safety helmet, Goggle, sickle cover, hand glove, wellington boots</td> </tr> </tbody> </table> <p>Similarly, the mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety</p>	Category	PPE provided	Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.	Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.	Manuring	Apron, wellington boots, dust mask, nitrile glove.	Engine Driver (Genset)	Safety Helmets, Safety shoes, Earmuff / Ear Plug, Gloves	Harvester	Safety helmet, Goggle, sickle cover, hand glove, wellington boots	<p>Complied</p>
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.</p> <table border="1" data-bbox="1137 466 1930 802"> <thead> <tr> <th>Category</th> <th>PPE provided</th> </tr> </thead> <tbody> <tr> <td>Mill operator</td> <td>Safety boots, earmuff, safety vest, helmet, cotton glove</td> </tr> <tr> <td>Water treatment Plant Operator</td> <td>Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.</td> </tr> <tr> <td>Workshop</td> <td>Safety Helmets, Goggles, Leather Gloves, safety Shoes.</td> </tr> </tbody> </table> <p>The mill and estates remained committed to issue PPE free of charge. Acknowledgement of PPE receipt records are maintained individually for all workers to cover against all potentially hazardous operations identified/recommended in the HIRARC Register, CHRA Report and Noise Risk Assessment Report. They are given to operatives involve in pesticide application, harvesting, equipment maintenance and machine operations. Observed PPE issued include safety helmets, safety shoes, rubber boots, apron, gloves and</p>	Category	PPE provided	Mill operator	Safety boots, earmuff, safety vest, helmet, cotton glove	Water treatment Plant Operator	Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.	Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.	
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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 is provided to all the employees by the organization and covered by accident insurance. Reviewed on workers profile records found that all workers are covered by the accident insurances. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for August, September and October 2022 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1137 1321 1930 1377"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Complied				
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKKP 8 form were submitted to DOE through MyKKP systems. Occupational Injuries were recorded as below:</p> <table border="1"> <tr> <td></td> <td>2021</td> <td></td> <td></td> </tr> </table>		2021			Complied																															
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

Operating Unit	Cases	TLA	Hours worked	Average Days Worked
Pamol POM	7	3	332304	138
Pamol Barat Estate	20	31	377208	157
Swee Lam Estate	23	56	232800	97
Unijaya Estate	15	233	199800	83
Pamol Timur Estate	46	63	429600	179

**Principle 7: Protect, conserve and enhance ecosystems and the environment**

**Criterion 7.1:** 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 for implementation is guided by 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.</p> <p>Beneficial plants such as Cassia cobanensis, Antigonon Leptopus and Tunera subulata were grown in the estates at recommended planting ratio 60:20:20 (CAT) at 20m/ha (i.e 12 m Cassia, 4m Antigonon and 4m Tunera). Records of planting of new areas and maintenance of existing areas of beneficial plants and location maps were available (predator host plant map).</p> <p>For Pest &amp; Disease (P&amp;D), census was carried out for rat damage on annual basis. Recent rat census at all estates assessed results showed attack were below threshold limit of 5%. The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the SOP operation.</p>	Complied
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

7.1.2	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. - Minor compliance -	IOI Pamol Certification Unit estates does not use any species referenced in the Global Invasive Species Database and CABI.org.	Complied
7.1.3	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. - Minor compliance -	There is no use of fire for pest control in IOI Pamol Supply Base Estates	Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<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. - Critical (Major) compliance -	All pesticides used were those officially registered under the Pesticide Act 1974. The CU confined usage to only class II, class III & class IV pesticides. The management as below: <ol style="list-style-type: none"> <li>1. No illegal agrochemicals (stated by local and international laws) paraquat was used in the estates.</li> <li>2. The usage of the agrochemicals was based on the Standard Operating Procedure under subject 7.1 Weeding - Weeds &amp; weeding and the Agrochemical Management Guidelines 28/08/2020 ref IOI/GG/SE/102 whereby written justifications had been provided for various fields operations.</li> <li>3. The SOP has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOP.</li> </ol> Purchases of pesticides are made on a centralized arrangement via Regional Office thus a control by the organization.	Complied

<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>The estates have records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</p> <p>a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified.</p> <p>b) All pesticides used were those officially registered under the Pesticide Act 1974. The estates had used only class II ,class III &amp; class IV pesticides.</p> <p>c) No illegal agrochemicals (stated by local and international laws) were used in their estates.</p> <p>Variation of chemical usage are attributed to sizes of immature areas, rainfall pattern and the regeneration growth of weeds in different type of soil series.</p> <p>Records of pesticides used and a.i per Ha is monitored monthly in the yearly Pesticide Records for January 2022 to Oct 2022. The records were sampled and available for verification as below:</p> <p><u>Pamol Barat Estate</u></p> <ol style="list-style-type: none"> <li>1. Glyphosate Isopropylamine = 0.95 L/Ha</li> <li>2. Cypermethrin Fluroxypyrmeptyl = 0.94 L/Ha</li> <li>3. Thiram Tetramethyl = 0.97 L/Ha</li> <li>4. Sodium Chloride =0.97 L/Ha</li> </ol> <p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> <li>1. Metsulfuron Metyhyl = 15.92 L/Ha</li> <li>2. Glyphosate Isoprorylamine = 0.0233 L/Ha</li> <li>3. Triclopyr Butoxy Etyhl = 0.10875 L/Ha</li> </ol>	<p>Complied</p>
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		<p><u>Unijaya Estate</u></p> <ol style="list-style-type: none"> <li>1. Glyphosate Isoprorylamine = 0.321 L/Ha</li> <li>2. Amine 24 D Methylomine = 0.100 L/Ha</li> <li>3. Fluoroxypyrmeptyl = 0.077 L/Ha</li> </ol>	
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.</p> <p>- Critical (Major) compliance -</p>	<p>During the audit, it was observed and recorded that the Estates had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Paraquat usage has been prohibited in all units and the entirety of the organization.</p> <p>The Safety Procedures for pesticides application were well described in SOP.</p>	Complied
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>No evidence of prophylactic use of pesticides in the estates visited as per Register of Chemicals Hazardous to Health for all estates visited.</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> <ol 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> </ol>	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations. The register showed and concluded that all pesticides used were of class II, III &amp; class IV. The use of paraquat had been prohibited in all IOI estates. As for usage of highly toxic/limited pesticides, the estates acquired permit from Department of Agriculture. SDS were placed in the chemical store for emergency purpose. Emergency eye wash located at the chemical store were functioned. Estate’s usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <p>There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>- Minor compliance -</p>	<p>Stockholm or Rotterdam Conventions been used. Sighted from records and interviews with workers, staff and estate assistants, concluded that training were held with all precautions being taken and all legal requirements met. Sample of chemical used in the estates among others as listed below;</p> <table border="1" data-bbox="1137 531 1924 879"> <thead> <tr> <th>No</th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate Isopropylamine 41%</td> <td>III</td> </tr> <tr> <td>2</td> <td>Metsulfuron Methyl 20%</td> <td>IV</td> </tr> <tr> <td>3</td> <td>Triclopyr Butoxy Ethyl Ester 32.1%</td> <td>III</td> </tr> <tr> <td>4</td> <td>Cyperact 16.0 EC</td> <td>III</td> </tr> <tr> <td>5</td> <td>Monex HC</td> <td>III</td> </tr> <tr> <td>6</td> <td>Winter 32.1 EC</td> <td>III</td> </tr> </tbody> </table>	No	Chemical name	Class	1	Glyphosate Isopropylamine 41%	III	2	Metsulfuron Methyl 20%	IV	3	Triclopyr Butoxy Ethyl Ester 32.1%	III	4	Cyperact 16.0 EC	III	5	Monex HC	III	6	Winter 32.1 EC	III	
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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>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms.</p>	Complied																					

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.          - Critical (Major) compliance -</p>	<p>Pesticides were only handled, used and applied by workers who have completed the necessary training and have been applied in accordance with the product SDS. All precautions attached to the SDS are properly observed, applied, and understood by workers as verified during the interview. Evidence of regular updates on the knowledge about the activity they carry out in regard to chemical handling were verified as below.</p> <table border="1" data-bbox="1137 603 1935 1264"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Swee Lam Estate</td> <td>Chemical Mixing SOP Training</td> <td>28/04/2022</td> </tr> <tr> <td>Weeds and Weeding StOPs Training</td> <td>14/01/2022</td> </tr> <tr> <td>Chemical Handling, HIRARC and Chemical Spraying Training</td> <td>14/01/2022</td> </tr> <tr> <td>Chemical Store Management, SDS and Spill Kit Training</td> <td>28/04/2022</td> </tr> <tr> <td rowspan="3">Unijaya Estate</td> <td>Chemical Mixing Training</td> <td>08/10/2022</td> </tr> <tr> <td>Chemical Store Management Training</td> <td>08/10/2022</td> </tr> <tr> <td>Chemical Handling Training</td> <td>20/04/2022</td> </tr> <tr> <td rowspan="2">Pamol Timur Estate</td> <td>Chemical Store Management Training</td> <td>12/04/2022</td> </tr> <tr> <td>Spraying Training</td> <td>21/07/2022</td> </tr> </tbody> </table>	Estate	Training	Date	Swee Lam Estate	Chemical Mixing SOP Training	28/04/2022	Weeds and Weeding StOPs Training	14/01/2022	Chemical Handling, HIRARC and Chemical Spraying Training	14/01/2022	Chemical Store Management, SDS and Spill Kit Training	28/04/2022	Unijaya Estate	Chemical Mixing Training	08/10/2022	Chemical Store Management Training	08/10/2022	Chemical Handling Training	20/04/2022	Pamol Timur Estate	Chemical Store Management Training	12/04/2022	Spraying Training	21/07/2022	Complied
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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.          - Minor compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of</p>	Complied																								

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.	
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>	Aerial application of agrochemicals is not practiced in estates visited. This is confirmed through observation during the site visit and interview with the employees. Such method is no longer in existence in the estate’s practices.	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>The CHRA for the estates and the mill was conducted. In addition, the assessor recommended medical surveillance be conducted for the categories of employees who have contact with chemicals. The medical surveillance was carried out on as below:</p> <p>Pamol POM - Medical Surveillance has been conducted on 30/09/2022 by DAB OH Sdn Bhd. A total of 41 workers were examined and none of them got abnormal results or recommended for removal.</p> <p>Pamol Barat Estate - Medical Surveillance has been conducted on 22/06/2022 by Poliklinik Intan (RZ Intan Medicatre Sdn Bhd). A total of 13 workers were examined and the results were all workers are certified as fit to work.</p> <p>Swee Lam Estate - Medical Surveillance has been conducted on 25/08/2022 by Klinik Renggam Kluang. A total of 9 workers were examined and the results were all workers are certified as fit to work.</p>	Complied



		<p>Unijaya Estate - Medical Surveillance has been conducted on 12/05/2022 by Poliklinik Intan (RZ Intan Medicatre Sdn Bhd). A total of 7 workers were examined and the results were all workers are certified as fit to work.</p> <p>Pamol Timur Estate - Medical Surveillance has been conducted on 27/09/2022 to 04/11/2022 by Klinik Renggam Kluang. A total of 11 workers were examined and the results were all workers are certified as fit to work.</p>			
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>	<p>Mill and estates complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation guidelines on reproductive health dated 05/10/2020 whereby; "No work with pesticides is given to pregnant or breast-feeding women. Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan)"</p> <p>The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.</p>	Complied		
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>					
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>IOI Pamol POM and estates have established a Waste Management and Reduction Plan which includes the identification of waste products and pollutants, Waste Generation, Action Plan &amp; Monitoring, Documents to be Reviewed, Management Review and time bound and Person In-Charge.</p> <p>Among the Waste Management and Reduction Plan sampled were as follows:</p> <table border="1" data-bbox="1137 1321 1928 1364"> <tr> <td>Source</td> <td>Waste &amp; Pollution</td> </tr> </table>	Source	Waste & Pollution	Non-compliance
Source	Waste & Pollution				

**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

		<table border="1"> <tr> <td data-bbox="1137 368 1355 443">Chemical Store</td> <td data-bbox="1355 368 1928 443">Chemical Spillage, Empty Chemical Containers &amp; Used Rags</td> </tr> <tr> <td data-bbox="1137 443 1355 555">Linesite</td> <td data-bbox="1355 443 1928 555">Domestic Waste, Sewage, Garden Residue, Recycle Items, Motor Lube Containers, Motor Lube Spillage</td> </tr> </table>	Chemical Store	Chemical Spillage, Empty Chemical Containers & Used Rags	Linesite	Domestic Waste, Sewage, Garden Residue, Recycle Items, Motor Lube Containers, Motor Lube Spillage						
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		<p>Among the Waste Management and Reduction Plan sampled at the estates were as follows:</p> <ol style="list-style-type: none"> <li>1. Waste Management and Reduction Plan Linesite. <ul style="list-style-type: none"> <li>- Domestic Waste, Sewage, Garden Residue, Recycle items, Motor Lube Containers, Motor Lube Spillage, Electrical Fitting.</li> </ul> </li> <li>2. Waste Management and Reduction Plan for Scrap Iron. <ul style="list-style-type: none"> <li>- Store or office Upgrading, Old trailers, old wheelbarrows.</li> </ul> </li> </ol> <p>Nevertheless, the Waste Management Plans were not adequately implemented. Evidence as follows.</p> <p><u>Pamol Barat Estate</u></p> <p>The SW date of generation stated in the Inventory of Scheduled Wastes Monthly Records and on the Scheduled Waste sticker placed at the stores showed different dates.</p> <p><u>Pamol Barat Estate</u></p>										
		<table border="1"> <thead> <tr> <th data-bbox="1144 1209 1451 1289">SW Code</th> <th data-bbox="1451 1209 1693 1289">Inventory Record Generation Date</th> <th data-bbox="1693 1209 1928 1289">Store Sticker Generation Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="1144 1289 1451 1337">SW 409</td> <td data-bbox="1451 1289 1693 1337">18/08/2022</td> <td data-bbox="1693 1289 1928 1337">17/08/2022</td> </tr> <tr> <td data-bbox="1144 1337 1451 1385">SW 305</td> <td data-bbox="1451 1337 1693 1385">21/08/2022</td> <td data-bbox="1693 1337 1928 1385">15/08/2022</td> </tr> </tbody> </table>	SW Code	Inventory Record Generation Date	Store Sticker Generation Date	SW 409	18/08/2022	17/08/2022	SW 305	21/08/2022	15/08/2022	
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SW 409	18/08/2022	17/08/2022										
SW 305	21/08/2022	15/08/2022										

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		SW 410 (Filter)	30/08/2022	Not Available
		SW 410 (PPE & Rags)	30/08/2022	18/08/2022
		SW 312	15/09/2022	01/09/2022
		SW 110	17/11/2022	18/11/2022
		<u>Swee Lam Estate</u>		
		SW Code	Inventory Record Generation Date	Store Sticker Generation Date
		SW 410	03/08/2022	30/08/2022
		SW 305	04/08/2022	03/08/2022
		SW 312	03/11/2022	03/08/2022
		<u>Unijaya Estate</u>		
		The estate had generated SW305 (Waste Oil) on 16/08/2022 and still currently being stored at the Scheduled Waste Store. Nevertheless, inventory of Scheduled Waste (e-swiss) as at November 2022 stated the balance for SW 305 was Zero.		
		<u>Pamol Timur Estate</u>		
		SW Code	E-swiss Inventory Record	Store Sticker Generation Date
		SW 410	Oct 2022	13/09/2022
		SW 104	Oct 2022	13/09/2022

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		SW 305	Oct 2022	30/09/2022	
		SW 306	Oct 2022	30/09/2022	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Hence a minor non-conformity was raised.</p> <p>Proper disposal of waste material is carried out as per the company procedures. The procedures are fully understood by workers and managers.</p> <p>Sampled the latest disposal of Schedule Waste as below:</p> <p><u>Pamol POM</u></p> <ol style="list-style-type: none"> <li>1. SW 429: Waste Chemicals; Quantity: 0.0482 Mt; Waste Code: Chemicals that are discarded or off-specification; Consignment Note Number: 2022101816H4MDK3; Date of Disposal: 18/10/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>2. SW 410; Contaminated Cotton Rags and Filters; Quantity: 0.1439; Consignment Note Number: 2022101816KFGI1A; Date of Disposal: 18/10/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>3. SW 312: Oily Residue from Automotive Workshop, Service Station, Oil or Grease Trap; Quantity: 0.0100 Mt; Waste Code: Oily residue from Oil Trap; Consignment Note Number: 2022101816NPGKIR; Date of Disposal: 18/10/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>4. SW 306: Spent Hydraulic Oil; Quantity: 0.3810 Mt; Consignment Note Number: 2022101816JY3OH4; Date of Disposal: 18/10/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>5. SW 305: Quantity: 0.0482 Mt; Waste Code: Chemicals that are discarded or off-specification; Consignment Note Number: 2022101816H4MDK3; Date of Disposal: 18/10/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> </ol>			OFI

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p><u>Pamol Barat Estate</u></p> <ol style="list-style-type: none"> <li>1. SW 104: Used Welding Rod; Quantity: 0.0070 Mt; Consignment Note Number: 2022081611H4ATZC; Date of Disposal: 16/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>2. SW 410: Used PPE, Rags and Filter; Quantity: 0.0340 Mt; Consignment Note Number: 2022081611TIHVK; Date of Disposal: 16/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>3. SW 305: Spent Lubricating Oil; Quantity: 0.5030 Mt; Consignment Note Number: 2022081611VJ62DE; Date of Disposal: 16/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> </ol> <p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> <li>1. SW 312: Oily Residue; Quantity: 0.0050 Mt; Consignment Note Number: 2022080312KTDOQ4; Date of Disposal: 03/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>2. SW 410: Used Filter; Quantity: 0.0025 Mt; Consignment Note Number: 202208031265YT72; Date of Disposal: 03/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>3. SW 410: Used Cotton Rags; Quantity: 0.0230 Mt; Consignment Note Number: 2022080312H0QNMI; Date of Disposal: 03/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>4. SW 305: Spent Lubricating Oil; Quantity: 0.0050 Mt; Consignment Note Number: 2022080312KTDOQ4; Date of Disposal: 03/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> </ol> <p><u>Unijaya Estate</u></p>	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> <li>1. SW 305: Spent Lubricating Oil; Quantity: 0.0624 Mt; Consignment Note Number: 2022111110C9ZEPK; Date of Disposal: 11/11/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>2. SW 430: Obsolete Chemical; Quantity: 0.500 Mt; Consignment Note Number: 2022111110MQ0UJY; Date of Disposal: 11/11/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>3. SW 410: Used Rags, PPE and Filter; Quantity: 0.0150 Mt; Consignment Note Number: 2022111110DBXFWG; Date of Disposal: 11/11/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>4. SW 404: Clinical Waste; Quantity: 0.0032 Mt; Consignment Note Number: 2022082211QWMDUJ; Date of Disposal: 22/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> </ol> <p><u>Pamol Timur Estate</u></p> <ol style="list-style-type: none"> <li>5. SW 305: Spent Lubricating Oil; Quantity: 0.1660 Mt; Consignment Note Number: 2022083012FNESKI; Date of Disposal: 30/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> <li>6. SW 306: Spent Hydraulic Oil; Quantity: 0.1030 Mt; Consignment Note Number: 2022083012NWHOMU; Date of Disposal: 30/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</li> </ol> <p>SW 410: Contaminated Filters; Quantity: 0.0350 Mt; Consignment Note Number: 2022083013TQGYV4; Date of Disposal: 30/08/2022; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p>OFI</p> <p>The estates can initiate the process of updating the 'Name of Reporting Officer' for Scheduled Waste responsibilities and reporting to ensure in line with current PICs.</p>	
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7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	IOI Pamol Certification Unit does not use fire for waste disposal. From field visits and interviews with the workers there is no open burning being practiced in the estates. No fire was used for waste disposal.	Complied
<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	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Good agriculture practices to manage soil fertility to ensure optimal and sustained yield and to minimize environmental impacts are followed in accordance to the Group Standard Operating Procedures (StOPs), particularly to the following documents: a. Section 4.0 Soil Conservation and Terracing b. Section 5.0 Establishment and Maintenance of Legume Covers c. Section 8.0: Manuring and d. Section 15.0 Foliar sampling.  Inorganic fertilizer as well as organic fertilizer in the form of POME and EFB is applied as per recommendation from IOI Research Centre. Recycling of biomass waste into useful nutrients, such as EFB application at 40t/ha, frond stacking, water management in low lying areas, maintenance of soft weeds, and keep Nephrolepis biserrata in the interline and terrace areas were evident during field visits at the assessed estates.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Tissue/foliar sampling and soil sampling was carried out on annual basis by Agronomist from IOI Research Center. The result was documented in Oil Palm Fertiliser Recommendation meant for fertilizer application in the following year. The foliar and soil sampling were conducted as follows:  Pamol Barat Estate – Leaf Nutrient Analysis conducted in March 2022 and Soil Nutrient Analysis Conducted in 2022.	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		Pamol Timur Estate - Leaf Nutrient Analysis conducted in February 2022 and Soil Nutrient Analysis Conducted in February 2022.																																											
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>Biomass waste recycling application was done as per program established with recommendation by agronomist. Sighted the application records as per EFB and POME Application program (Jan 2022 – October 2022) as follows.</p> <p><u>Empty Fruit Bunches Application</u></p> <table border="1" data-bbox="1137 624 1928 871"> <thead> <tr> <th>Month</th> <th>PBE</th> <th>PTE</th> <th>UJE</th> <th>SWE</th> </tr> </thead> <tbody> <tr> <td>Jul 2022</td> <td>1,328.53</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Aug 2022</td> <td>1,297.28</td> <td>-</td> <td>200.00</td> <td>-</td> </tr> <tr> <td>Sept 2022</td> <td>1,429.91</td> <td>-</td> <td>371.99</td> <td>-</td> </tr> <tr> <td>Oct 2022</td> <td>1,117.88</td> <td>-</td> <td>76.15</td> <td>-</td> </tr> </tbody> </table> <p><u>POME (Solid and Liquid) Application</u></p> <table border="1" data-bbox="1137 962 1928 1259"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">PBE &amp; PTE</th> </tr> <tr> <th>Solid (mt)</th> <th>Liquid (mt)</th> </tr> </thead> <tbody> <tr> <td>Jul 2022</td> <td>338.24</td> <td>25,244</td> </tr> <tr> <td>Aug 2022</td> <td>228.30</td> <td>23,314</td> </tr> <tr> <td>Sept 2022</td> <td>210.33</td> <td>24,018</td> </tr> <tr> <td>Oct 2022</td> <td>191.03</td> <td>255,11</td> </tr> </tbody> </table>	Month	PBE	PTE	UJE	SWE	Jul 2022	1,328.53	-	-	-	Aug 2022	1,297.28	-	200.00	-	Sept 2022	1,429.91	-	371.99	-	Oct 2022	1,117.88	-	76.15	-	Month	PBE & PTE		Solid (mt)	Liquid (mt)	Jul 2022	338.24	25,244	Aug 2022	228.30	23,314	Sept 2022	210.33	24,018	Oct 2022	191.03	255,11	Complied
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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 Agronomist from IOI Research Centre and documented in Fertilizer Recommendation Report. Observed the recommendation and implementation record completed for all estates, documented in the</p>	Complied																																										



		Monitoring Record – Fertiliser Usage which was available for verification.	
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series map were available for all estates visited prepared by the IOI Research Centre. There is no marginal or fragile present at Pamol Estates. Soil series and identified as follows:</p> <ol style="list-style-type: none"> <li><u>Pamol Barat Estate</u> Soil series include beserah, Bungor, Camp, Chat, Durian, Gajah Mati, Gali, Guan, Harimau, Katong, Kuala Brang, Rengam, Segamat, Serdang, Setol, Tai Tak, tebok and Terap.</li> <li><u>Swee Lam Estate</u> Soil series include Jerangau, Rengam and Rengam/Jerangau Series.</li> <li><u>Unijaya Estate</u> Soil series include Batu Lapan, Colluvium, Durian, Gajah mati, Kuah, Lating, Local Aluvium, Malacca and Rengam Series.</li> <li><u>Pamol Timur Estate</u> Soil series include Asahan, Batang Merbau, Batu Anam, Batu Lapan, Bungor, Chat, Durian, Gajah Mati, Gong Chenak, Harimau, jempol, Jitra, Katong, Kerayong, Kuala Brang, Rengam, Musang, Tebok abd Terap among others. 4rty</li> </ol>	Complied
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>Noted the requirement of this indicator 7.5.2 has been complied by Pamol Kluang region. This requirement is also 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:</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>"No planting/terracing shall be carried out at very steep terrains (<math>\geq 25^\circ</math> slope)".</p> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>Mucuna Bracteata</i> had been planted along crucial slopes by management. Large areas with <i>Neprolepis Biserrata</i> in the inter rows were sighted during the visit.</p>	
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No planting on steep terrain is practiced at both estates as confirmed during field visits.</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 which still same as verified during the previous audit. No marginal and fragile soils identified in all estates in Pamol Kluang Region. During field visit at the sampled estate sighted there was no palm oil planting on steep terrain. On the other hand, land terrain, drainage and road systems during planning were evident.</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>Planting on marginal and fragile soils is avoided in conformance with IOI Procedure SOP for land Preparation for Management of Oil Palm on Peatland Replanting, document no. IOI/SOP/A/03 issue date 2007 revision March 2020. As per site visit that has been conducted, there is no extensive planting on marginal and fragile soil for each estates under IOI Pamol Kluang POM</p>	Complied

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	IOI Research Centre conducted assessment and provided the estates with soil survey information (soil series map sighted available) and topography information. As per site visit, road and irrigation systems has been established accordingly as per best practices.	Complied
<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	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	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	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> 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). - Minor compliance -	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.	Not Applicable
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	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.	Not Applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	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.	Not Applicable
7.7.5	<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	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.	Not Applicable

	<p>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>		
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.	Not Applicable
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.	Not Applicable
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<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> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p>	<p>IOI Pamol POM have established a Water Management Plan for the year 2022 available for verification. The purpose of the plan is to maintain the quality and availability of the natural water resources. Verified the water management plan and its implementations as below:</p> <p>1. Water usage is monitored on a monthly basis by the mill and the data has been provided under indicator 7.8.4.</p>	Complied

	<p>- Minor compliance -</p>	<p>2. Water for consumption is provided by Syarikat Bekalan Air Johor, government agency providing clean consumable water to the state.</p> <p>IOI Pamol Certification Unit estates have established a Water Management Plan for the year 2021 available for verification. The purpose of the plan is to maintain the quality and availability of the natural water resources. Verified the water management plan and its implementations as below:</p> <p><u>Pamol Barat Estate</u></p> <ol style="list-style-type: none"> <li>1. Water for consumption is provided by Syarikat Bekalan Air Johor, government agency providing clean consumable water to the state.</li> <li>2. Monitoring of incoming and outgoing water course at 3 natural streams was done once a year by the estate management. The recent water sampling was done on 11/08/2022. The analysis was done by IOI Research Centre and the report results (Report Number: PBE/09/09/2022) was available for verification.</li> <li>3. Riparian zones were maintained along the 3 natural Streams that run along the estate into Sungai Sembrong. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected.</li> </ol> <p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate treats its domestic water at their own Water Treatment Plant. The domestic Water Discharge Quality was monitored on a monthly basis to ensure that he drinking water</li> </ol>	
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		<p>provided to the staffs and workers were within the WHO Specifications. The most recent sampling was conducted on April 2022 by ENV Consultancy &amp; Monitoring Services Sdn Bhd. The results were compared against the WHO/MOH DWQS limits and found that all except the Aluminium component complied with the limits. The management hence have conducted a retest on 26/05/2022 on the aluminium component and found to be within the limits.</p> <ol style="list-style-type: none"> <li>2. Monitoring of incoming and outgoing water course at 2 natural streams (Natural Stream A and Natural Stream B) was done once a year by the estate management. The recent water sampling was done on 03/08/2022. The analysis was done by IOI Research Centre and the report results was available for verification. The report states that all parameters were within the INWQS limits.</li> <li>3. Riparian zones were maintained along the natural Streams that run along the estate. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected.</li> </ol> <p><u>Unijaya Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate treats its domestic water at their own Water Treatment Plant. The domestic Water Discharge Quality was monitored on a biannual basis to ensure that he drinking water provided to the staffs and workers were within the WHO Specifications. The most recent sampling was conducted on 09/08/2022 by ETOSH Consult &amp; Engineering Plt. The results were compared against the WHO/SPAN limits and found that all component complied with the limits.</li> </ol>	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>2. Monitoring of incoming and outgoing water course at the 2 natural streams (Natural Stream A and Natural Stream B) was done once a year by the estate management. The recent water sampling was done on 27/01/2022. The analysis was done by IOI Research Centre and the report results was available for verification. The report states that all parameters were within the INWQS limits.</p> <p>3. Riparian zones were maintained along the natural Streams that run along the estate. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected.</p> <p><u>Pamol Timur Estate</u></p> <p>1. Water for consumption is provided by Syarikat Bekalan Air Johor, government agency providing clean consumable water to the state.</p> <p>2. Monitoring of incoming and outgoing water course at 3 natural streams was done once a year by the estate management. The recent water sampling was done on 10/08/2022. The analysis was done by IOI Research Centre and the report results was available for verification. The report states that water quality complies with the WQI standards</p> <p>Riparian zones were maintained along the natural Streams that run along the estate. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected.</p>	
7.8.2	<b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO	Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. IOI group has	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

	<p>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>established riparian buffer zone distance as per Department of Irrigation and Drainage department and documented in HCV Assessment Report for the estates:</p> <p><u>Pamol POM</u></p> <p>Pamol POM is required by DOE under the Compliance Schedule to monitor river water quality at the river nearby to the mill which is Sungai Sembrong on a monthly basis. The river water analysis was conducted by Etosh Consult &amp; Engineering Plt and available for verification as below.</p> <table border="1" data-bbox="1137 718 1928 1145"> <thead> <tr> <th>Description</th> <th>September</th> <th>October</th> </tr> </thead> <tbody> <tr> <td>Date Sample Received</td> <td>06/09/2022</td> <td>04/10/2022</td> </tr> <tr> <td>Date Sample Reported</td> <td>13/09/2022</td> <td>11/10/2022</td> </tr> <tr> <td>Reference Number</td> <td>PAMOL/STREAM/SE PT/2022</td> <td>PAMOL/STREAM/O CT/2022</td> </tr> <tr> <td>Sample Description</td> <td>River Water</td> <td>River Water</td> </tr> <tr> <td>Results</td> <td colspan="2">All sampling points comply with Class III National Water Quality Standard (NWQS)</td> </tr> </tbody> </table> <p>Pamol Estates</p> <p>Well established riparian zones were maintained along the natural Streams that run along the estates. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected.</p>	Description	September	October	Date Sample Received	06/09/2022	04/10/2022	Date Sample Reported	13/09/2022	11/10/2022	Reference Number	PAMOL/STREAM/SE PT/2022	PAMOL/STREAM/O CT/2022	Sample Description	River Water	River Water	Results	All sampling points comply with Class III National Water Quality Standard (NWQS)		
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>Interview with the sprayers and manurers indicated that they are aware of the prohibition of any activities along the buffer zones.</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>Pamol Palm Oil Mill has license for discharge of POME through land application based on the Environmental Quality Act (Act 127) with BOD specification &lt;100 mg/L, Suspended solids ≤411mg/L, Oil and Grease ≤50 mg/L, Ammoniacal nitrogen &lt;150mg/L, total nitrogen &lt;200 mg/l and pH 5.0 - 9.0. This parameter is tested regularly by in-house lab and accredited lab and analyzed on weekly basis.</p> <p>The monitoring of the Final Discharge point is done on a monthly basis. Sampled the Results as below:</p> <table border="1" data-bbox="1137 719 1926 1150"> <thead> <tr> <th>Parameter</th> <th>July 2022</th> <th>Aug 2022</th> <th>Sept 2022</th> </tr> </thead> <tbody> <tr> <td>Sample Date</td> <td>05/07/2022</td> <td>02/08/2022</td> <td>05/09/2022</td> </tr> <tr> <td>pH Value</td> <td>7.68</td> <td>8.79</td> <td>8.59</td> </tr> <tr> <td>BOD</td> <td>38</td> <td>49</td> <td>38</td> </tr> <tr> <td>COD</td> <td>139</td> <td>219</td> <td>163</td> </tr> <tr> <td>Total Solids</td> <td>3998</td> <td>3499</td> <td>766</td> </tr> <tr> <td>Oil and Grease</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Ammoniacal Nitrogen</td> <td>16.40</td> <td>15.40</td> <td>15.10</td> </tr> </tbody> </table>	Parameter	July 2022	Aug 2022	Sept 2022	Sample Date	05/07/2022	02/08/2022	05/09/2022	pH Value	7.68	8.79	8.59	BOD	38	49	38	COD	139	219	163	Total Solids	3998	3499	766	Oil and Grease	0	0	0	Ammoniacal Nitrogen	16.40	15.40	15.10	<p>Complied</p>
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>IOI Pamol POM has been monitoring its water usage on daily basis. The water was sourced from the nearby water catchment pond Based on the monthly records, the monthly usage of water in 2022 is as follows:</p> <table border="1" data-bbox="1137 507 1921 1056"> <thead> <tr> <th>Month</th> <th>Water (m<sup>3</sup>)</th> </tr> </thead> <tbody> <tr> <td>Jan 2022</td> <td>10,390</td> </tr> <tr> <td>Feb 2022</td> <td>9,765</td> </tr> <tr> <td>Mar 2022</td> <td>12,040</td> </tr> <tr> <td>Apr 2022</td> <td>11,534</td> </tr> <tr> <td>May 2022</td> <td>12,642</td> </tr> <tr> <td>Jun 2022</td> <td>11,771</td> </tr> <tr> <td>Jul 2022</td> <td>11,342</td> </tr> <tr> <td>Aug 2022</td> <td>12,069</td> </tr> <tr> <td>Sept 2022</td> <td>9,115</td> </tr> <tr> <td>Oct 2022</td> <td>10,091</td> </tr> </tbody> </table>	Month	Water (m <sup>3</sup> )	Jan 2022	10,390	Feb 2022	9,765	Mar 2022	12,040	Apr 2022	11,534	May 2022	12,642	Jun 2022	11,771	Jul 2022	11,342	Aug 2022	12,069	Sept 2022	9,115	Oct 2022	10,091	Complied
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<p><b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																									

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

<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 for improving efficiency of fossil fuel was spelt out in Renewable Energy Plan for Pamol POM. Among the plans established by the operating unit were:</p> <ol style="list-style-type: none"> <li>1. ensure optimum FFB ramp balance to commence processing - closely monitor the diesel engine running hour</li> <li>2. optimise the diesel engine only running for start and stoppage of the boiler</li> <li>3. optimise the biogas engine to supply energy to reduce diesel engine hour</li> <li>4. timely service of diesel-powered tractors and machinery to ensure efficient use of diesel &amp; avoid leakages.</li> <li>5. regular servicing of turbine for a better efficiency and to minimise running of gen-set.</li> <li>6. educate employees on fuel saving practices</li> </ol> <p>Direct usage of diesel for the mill and estate operations were recorded.</p> <p>The data is compiled for comparison and control for future improvement with aim of gradual reduction of fossil fuel usage.</p> <p>Sighted the sampled monitoring records for diesel and electricity usage for FY 2021 (mill and contractor) as follows:</p> <table border="1" data-bbox="1133 1098 1930 1391"> <thead> <tr> <th>Month</th> <th>Diesel/FFB (L/mt)</th> <th>Electricity/FFB (kWh/mt)</th> </tr> </thead> <tbody> <tr> <td>Jan 2022</td> <td>1.29</td> <td>67.27</td> </tr> <tr> <td>Feb 2022</td> <td>1.33</td> <td>170.70</td> </tr> <tr> <td>Mar 2022</td> <td>1.11</td> <td>99.62</td> </tr> <tr> <td>Apr 2022</td> <td>1.35</td> <td>121.59</td> </tr> <tr> <td>May 2022</td> <td>1.19</td> <td>123.87</td> </tr> </tbody> </table>	Month	Diesel/FFB (L/mt)	Electricity/FFB (kWh/mt)	Jan 2022	1.29	67.27	Feb 2022	1.33	170.70	Mar 2022	1.11	99.62	Apr 2022	1.35	121.59	May 2022	1.19	123.87	<p>Complied</p>
Month	Diesel/FFB (L/mt)	Electricity/FFB (kWh/mt)																			
Jan 2022	1.29	67.27																			
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May 2022	1.19	123.87																			

**RSPO P&C Public Summary Report  
Revision 14 (Aug 2022)**

Jun 2022	1.19	140.40
Jul 2022	1.37	148.65
Aug 2022	1.35	155.68
Sept 2022	1.37	123.02
Oct 2022	2.08	93.74

Sighted the sampled monitoring records for diesel, electricity and water usage for FY 2020 (estate and contractor) as follows:

Pamol Barat Estate

Month	Diesel/FFB	Water	Electricity (kWh/FFB)
Jan 2020	2.42	1,265.75	21.76
Feb 2020	1.95	1,544.57	10.43
Mar 2020	2.21	1,442.05	8.62
Apr 2020	3.46	1,259.02	8.12
May 2020	2.11	1,397.86	7.36
Jun 2020	2.21	1,152.96	6.63
Jul 2020	1.95	1,158.62	6.11
Aug 2020	2.10	1,303.00	5.21
Sept 2020	1.98	1,193.46	6.16
Oct 2020	2.17	1,349.47	7.74

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

Swee Lam Estate			
Month	Diesel/FFB	Water	Electricity (kWh)
Jan 2020	3.82	2,298	7.61
Feb 2020	5.25	2,283	11.17
Mar 2020	4.67	2,075	8.59
Apr 2020	4.13	1,816	7.22
May 2020	5.08	1,810	9.58
Jun 2020	5.13	1,928	8.94
Jul 2020	5.15	2,107	8.82
Aug 2020	5.83	2,153	6.69
Sept 2020	6.28	1,926	10.33
Oct 2020	5.40	2,213	10.19
Unijaya Estate			
Month	Diesel/FFB	Water	Electricity (kWh/FFB)
Jan 2020	0.94	1,598	11.18
Feb 2020	1.30	1,600	11.77
Mar 2020	1.26	1,650	9.84
Apr 2020	1.24	1,650	9.50
May 2020	1.34	1,555	7.82
Jun 2020	2.41	1,552	8.61

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

Jul 2020	0.94	1,600	9.42
Aug 2020	1.11	1,552	8.82
Sept 2020	1.73	1,600	11.34
Oct 2020	0.55	1,578	9.53

Pamol Timur Estate

Month	Diesel/FFB	Water	Electricity (kWh/FFB)
Jan 2020	0.93	10,992	6.99
Feb 2020	1.36	11,428	8.25
Mar 2020	1.46	11,138	6.60
Apr 2020	2.01	10,836	6.19
May 2020	1.26	11,528	6.23
Jun 2020	1.22	11,012	6.61
Jul 2020	1.15	10,786	6.31
Aug 2020	1.18	11,286	5.39
Sept 2020	1.45	11,182	6.08
Oct 2020	1.35	11,920	5.02

**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.

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

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 justifiable at the site.</p>	Complied						
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>	Not Applicable						
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>All polluting activities were assessed through the aspect and impact method and were documented. The activities are inclusive of green gas emissions, chemicals, fertilizer, scheduled waste, solid waste and household waste. Data relating to such activities were collected, analysed and presented during the environmental meetings held by the mill.</p> <p>Sampled the Stack Emission Monitoring for the Mill Boiler as below: Facility: Boiler 2 – Chimney No.2 (Date: 24/01/2022)</p> <table border="1" data-bbox="1137 1286 1930 1377"> <thead> <tr> <th data-bbox="1137 1286 1541 1337">Parameter</th> <th data-bbox="1541 1286 1729 1337">Results</th> <th data-bbox="1729 1286 1930 1337">Limit Value</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1337 1541 1377">Report Number</td> <td colspan="2" data-bbox="1541 1337 1930 1377">AEMR(J)/22-01/20</td> </tr> </tbody> </table>	Parameter	Results	Limit Value	Report Number	AEMR(J)/22-01/20		Complied
Parameter	Results	Limit Value							
Report Number	AEMR(J)/22-01/20								

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		Total Particulate Matter (mg/m <sup>3</sup> )	146.7	150		
		Sum of SO and SO <sub>3</sub> expressed as NO <sub>3</sub> (mg/m <sup>3</sup> )	5.5	400		
		Sum of NO and NO <sub>2</sub> expressed as NO <sub>2</sub> (mg/m <sup>3</sup> )	135.0	400		
		Dark Smoke	Ringelmann Chart No.1	Ringelmann Chart No.1		
		Facility: Boiler 1 – Chimney No.2 (Date: 02/06/2022)				
		Parameter	Results	Limit Value		
		Report Number	AEMR(J)/22-06/01			
		Total Particulate Matter (mg/m <sup>3</sup> )	139.60	150		
		Sum of SO and SO <sub>3</sub> expressed as NO <sub>3</sub> (mg/m <sup>3</sup> )	6.40	400		
		Sum of NO and NO <sub>2</sub> expressed as NO <sub>2</sub> (mg/m <sup>3</sup> )	273.20	400		
Dark Smoke	Ringelmann Chart No.0	Ringelmann Chart No.1				
The concentration of air emitted from Boiler at Pamol Kluang Palm Oil Mill have complied with the limit as set out in Environmental Quality (Clean Air) Regulation 2014, Regulation 13, Second Schedule Requirement, Regulation 15, Fifth Schedule, Category 4 (b) Requirement.						



<b>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</b>			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>IOI group has established Zero Burning Policy as per 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, EQA 1974 specifically on section 29A (prohibition on Open Burning) and 29AA (Exclusion from 'Open Burning') signed by the Plantation Director on May 2018. The policy was communicated to all the employee through training, briefing and signage at several notice board in the estate.</p> <p>IOI group has established Group Standard Operating Procedure (StOP) for Land Clearing, index 4.1 and Group Standard Operating Procedure (StOP) for Land Preparation for New Planting and Replanting, index 4.2 prepared on September 2007. All felled palms will be shredded or chip and piled between planting rows.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Pamol Certification Units 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.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>During external stakeholder meeting that was carried out at each Operating centres (Estate &amp; Mill), all stakeholders including neighbour was briefed on fire prevention and control measures. Besides that, all operating centres also been prepared Emergency Response Plan (Fire in Field/ Peat Areas in Own or Neighbouring Estate).</p> <p><u>Pamol POM</u></p> <p>The stakeholders have been provided with the slides regarding to Fire Prevention and Control Measures by IOI Plantations with the acknowledgement form undersigned by the stakeholders on 14/10/2022.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p><u>Pamol Timur Estate</u></p> <p>The stakeholders have been provided with the slides regarding to Fire Prevention and Control Measures by IOI Plantations with the acknowledgement form undersigned by the stakeholders on 06/10/2022 and 23/11/2022</p>	
<p><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.</p>			
<p>7.12.1</p>	<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>No new planting within Pamol POM certification unit. Thus, this indicator is not applicable.</p>	<p>Complied</p>
<p>7.12.2</p>	<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></p> <p>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>High Conservation Value (HCV) &amp; Conservation Area Assessment was conducted by the IOI Group HQ and documented in a report titled High Conservation Value (HCV) &amp; Conservation Area Assessment and Management Action Plans (Review Document). The exercise has taken into consideration all aspects of environmentally sensitive areas such as rivers, streams, ponds, wildlife boundaries and was documented in the report. The reports state the HCV Identification, methods of managing and monitoring the identified. Verified the reports and the HCVs and biodiversity's available as below.</p>	<p>Complied</p>

		<p><u>Pamol Timur Estate</u> High Conservation Value (HCV) &amp; Conservation Area Assessment and Management Action Plans (Review Document) – Pamol Timur Estate (Date Update: 17/11/2022).</p> <table border="1"> <thead> <tr> <th>Categories</th> <th>Area</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="2">HCV</td> <td>Internal HCV 4: Natural Water Streams</td> <td>3.01 Ha</td> </tr> <tr> <td>Internal HCV 4: Steep Terrain</td> <td>2.30 Ha</td> </tr> <tr> <td rowspan="2">Conservation</td> <td>Natural streams riparian reserve</td> <td>12.50 Ha</td> </tr> <tr> <td>Pond</td> <td>1.31 Ha</td> </tr> </tbody> </table> <p><u>Unijaya Estate</u> High Conservation Value (HCV) &amp; Conservation Area Assessment and Management Action Plans (Review Document) – Unijaya Estate (Date Update: 09/11/2022).</p> <table border="1"> <thead> <tr> <th>Categories</th> <th>Area</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>HCV</td> <td>Internal HCV 4: Natural Water Streams</td> <td>1.16 Ha</td> </tr> <tr> <td rowspan="2">Conservation</td> <td>Natural streams riparian reserve</td> <td>4.34 Ha</td> </tr> <tr> <td>Pond</td> <td>0.31 Ha</td> </tr> </tbody> </table> <p><u>Swee Lam Estate</u></p>	Categories	Area	Ha	HCV	Internal HCV 4: Natural Water Streams	3.01 Ha	Internal HCV 4: Steep Terrain	2.30 Ha	Conservation	Natural streams riparian reserve	12.50 Ha	Pond	1.31 Ha	Categories	Area	Ha	HCV	Internal HCV 4: Natural Water Streams	1.16 Ha	Conservation	Natural streams riparian reserve	4.34 Ha	Pond	0.31 Ha	
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>High Conservation Value (HCV) &amp; Conservation Area Assessment and Management Action Plans (Review Document) – Swee Lam Estate (Date Update: 10/11/2022).</p> <table border="1" data-bbox="1137 467 1926 750"> <thead> <tr> <th>Categories</th> <th>Area</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>HCV</td> <td>Internal HCV 4: Natural Water Streams</td> <td>6.08 Ha</td> </tr> <tr> <td rowspan="3">Conservation</td> <td>Natural streams riparian reserve</td> <td>7.47 Ha</td> </tr> <tr> <td>Worshiping Area</td> <td>-</td> </tr> <tr> <td>Pond</td> <td>0.29 Ha</td> </tr> </tbody> </table>	Categories	Area	Ha	HCV	Internal HCV 4: Natural Water Streams	6.08 Ha	Conservation	Natural streams riparian reserve	7.47 Ha	Worshiping Area	-	Pond	0.29 Ha	
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7.12.3	<i>Indicator is not applicable in Malaysia context</i>		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 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>	<p>High Conservation Value (HCV) &amp; Conservation Area Assessment was conducted by the IOI Group HQ and documented in a report titled High Conservation Value (HCV) &amp; Conservation Area Assessment and Management Action Plans (Review Document). The exercise has taken into consideration all aspects of environmentally sensitive areas such as rivers, streams, ponds, wildlife boundaries and was documented in the report. The reports state the HCV Identification, methods of managing and monitoring the identified. Verified the reports and the HCVs and biodiversity's available as in indicator 7.12.2</p> <p>Management plan that has been established include plan to</p> <ul style="list-style-type: none"> <li>• To enhance security to prevent illegal hunting</li> <li>• To establish/maintain riparian zone according to DID guideline</li> <li>• To rehabilitate the degraded riparian zone</li> </ul>	Complied													

		<ul style="list-style-type: none"> <li>To provide awareness and education among employees regarding HCV and conservation areas through trainings and signage's</li> </ul> <p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all the buffer zones and signage was well maintained. Records of HCV and Biodiversity Awareness Trainings were available for verification.</p> <p>As per verification by the auditor, it has been confirmed that monitoring and management plan has been established is effectively implemented. There is no incompliance with the management plan and the management decided to maintain current management plan as practices.</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>Based on internal HCV assessment dated 2022, no local communities identified within HCV area under Pamol POM certification unit.</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>No RTE species identified in the external HCV 4 for Pamol Estates. Based on RTE assessment dated November 2022, only protected, totally protected and protected wildlife for aborigine consumption were sighted in the estate. Species such as monitor lizard, wild boar, king cobra and red jungle fowl to name a few.</p> <p>Regular programme to educate workforce about the status of RTE species is in place. RTE training, buffer zone training and were given to the workforce emphasising on disciplinary measures if any</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		individual working for the company is found to capture, harm, collect, trade, possess or kill these RTE species.	
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. Monitoring of conservation area (conservation, riparian, forest buffer) was done on weekly basis. Senarai Semak dan Rekod Pemantauan di Kawasan Konservasi/forest buffer/buffer zone for 2022 was made available for verification.	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 land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Pamol POM certification unit.	Complied

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2021 for **Pamol POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2021 for **Pamol POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	2.86
PKO	2.86

Extraction	%
OER	22.93
KER	4.61

Production	t/yr
FFB Process	237,497.14
CPO Produced	54,462.38
PKO Produced	10,954.54

Land Use	Ha
OP Planted Area	10,831.00
OP Planted on peat	0
Conservation (forested)	35.44
Conservation (non-forested)	34.09
<b>Total</b>	<b>10,900.53</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	103,103.16	0.43	0.00	0.00	0.00	0.00	103,103.16	0.43
CO <sub>2</sub> Emission from fertilizer	124,19.05	0.05	0.00	0.00	0.00	0.00	12,419.05	0.05
NO <sub>2</sub> Emission	6,765.99	0.03	0.00	0.00	0.00	0.00	6,765.99	0.03
Fuel Consumption	1,592.75	0.01	0.00	0.00	0.00	0.00	1,592.75	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	-96,247.88	-0.41	0.00	0.00	0.00	0.00	-96,247.88	-0.41
Conservation Sequestration	-311.43	-0.00	0.00	0.00	0.00	0.00	-311.43	-0.00
<b>Total</b>	<b>27,321.64</b>	<b>0.12</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>27,321.64</b>	<b>0.12</b>

*\*Note: Includes both estates and smallholders*

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	183,965.54	0.77
Fuel Consumption	285.41	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-24,219.34	-0.10
Sales of EFB	0.00	0.00
<b>Total</b>	<b>160,031.61</b>	<b>0.68</b>

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

Emissions	tCO <sub>2</sub> e
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
Divert to anaerobic diversion (%)	100

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

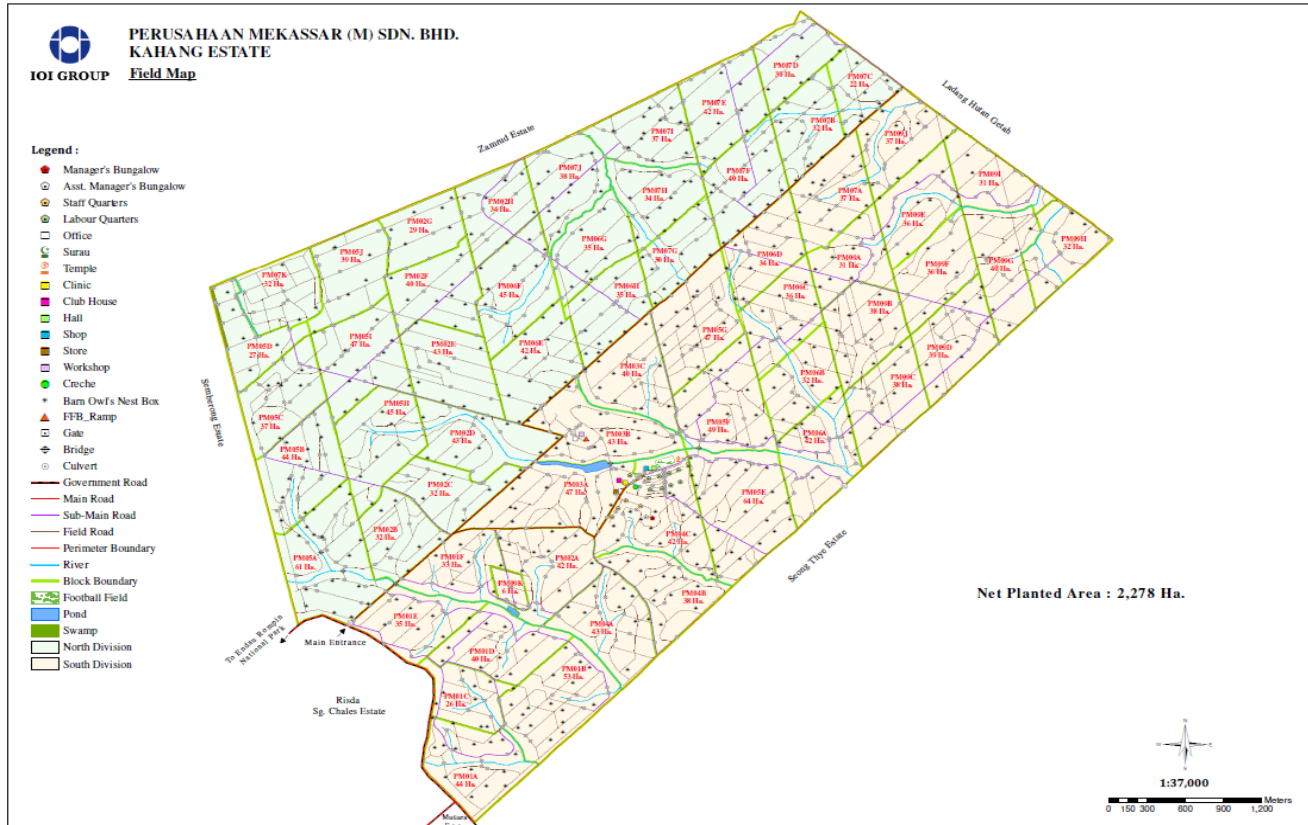


**Appendix C: Location Map of Certification Unit and Supply bases**

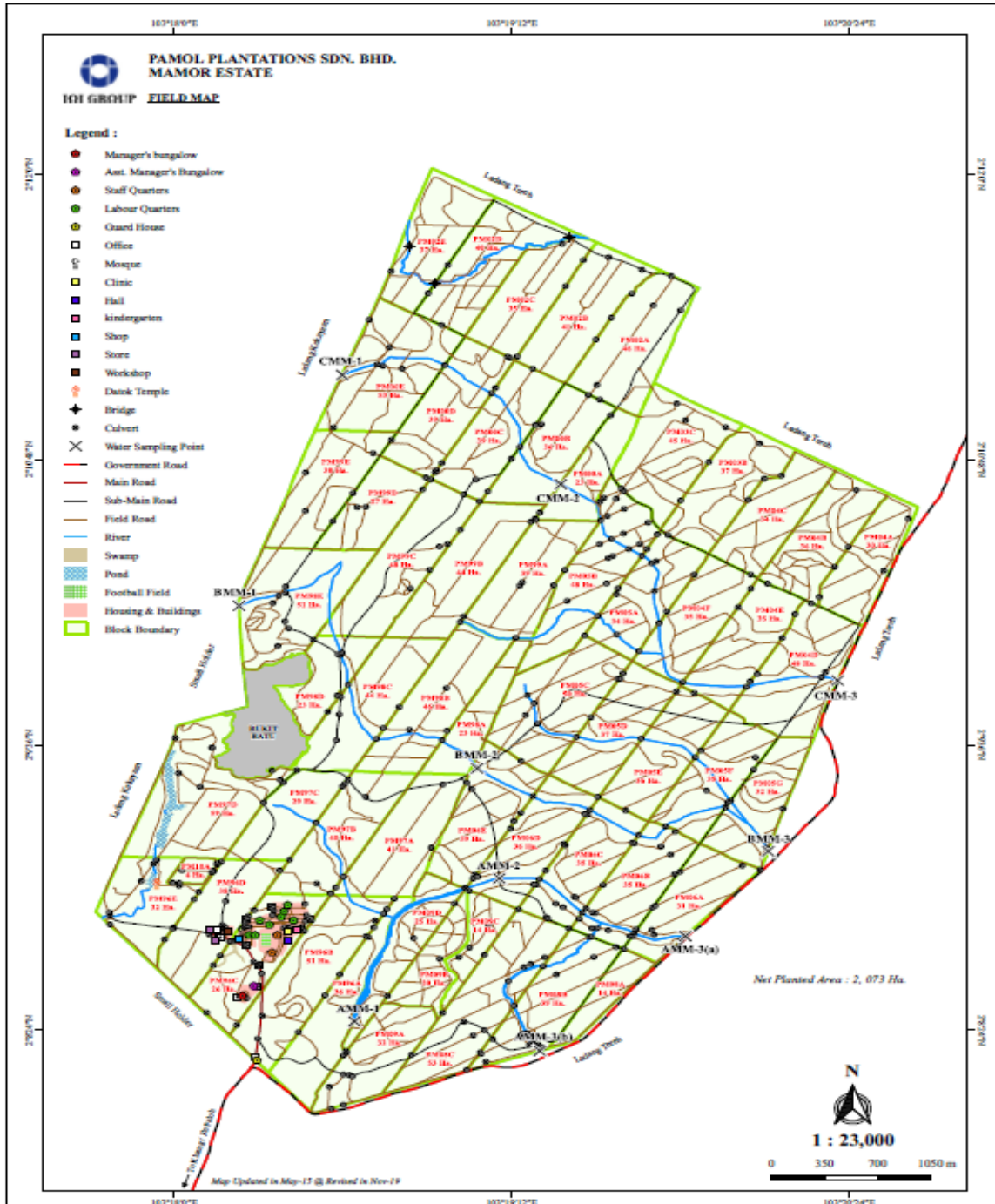


**Appendix D: Estate Field Map**

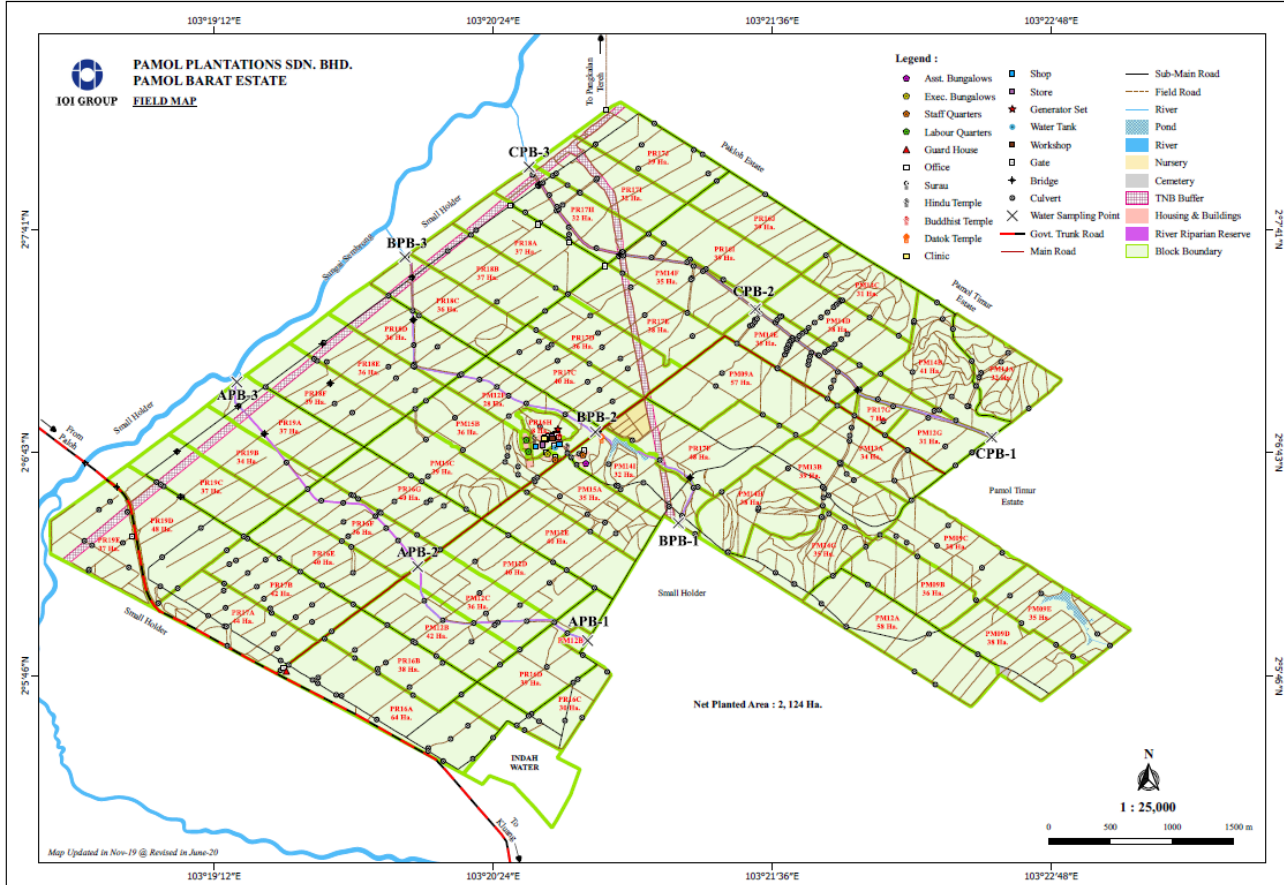
**Kahang Estate**



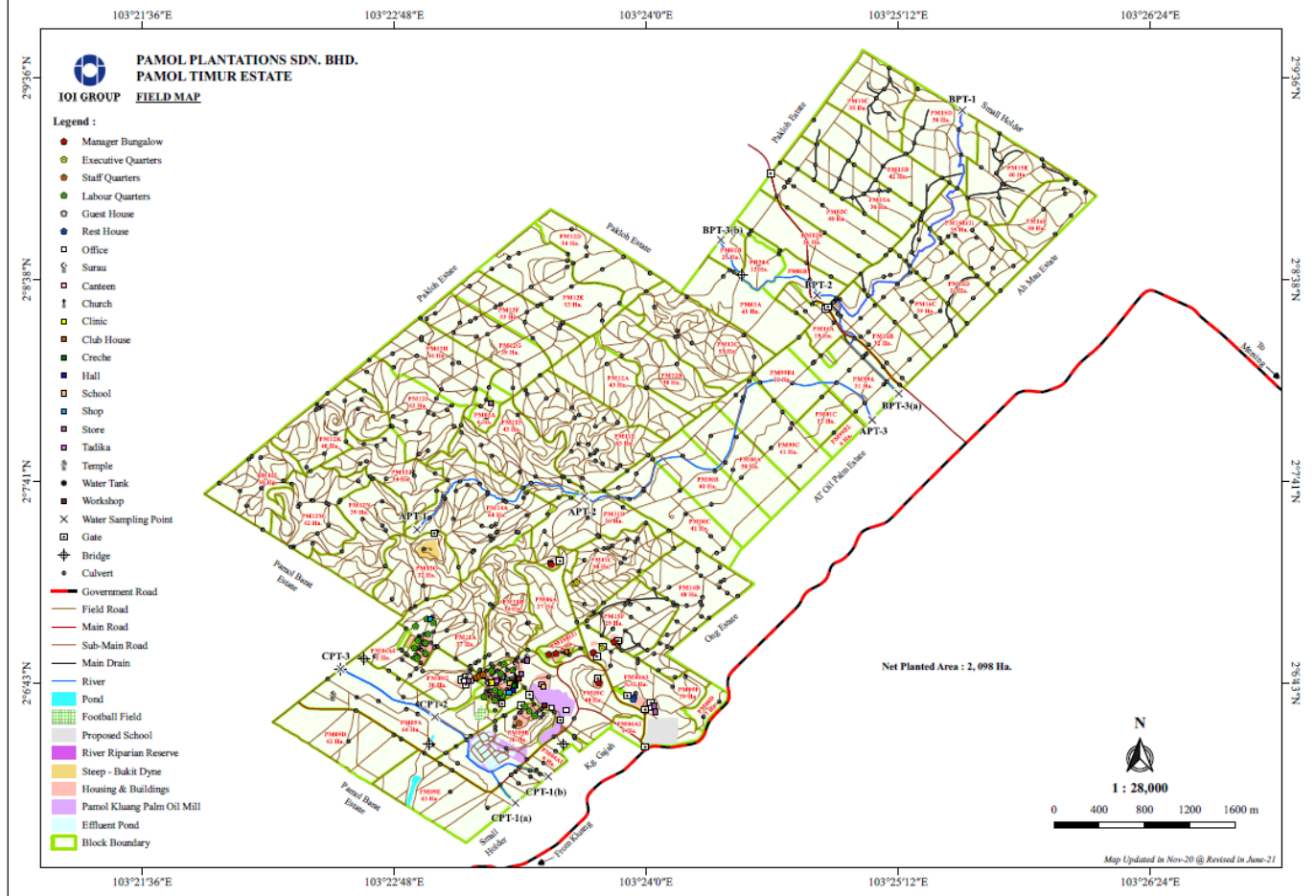
Mamor Estate



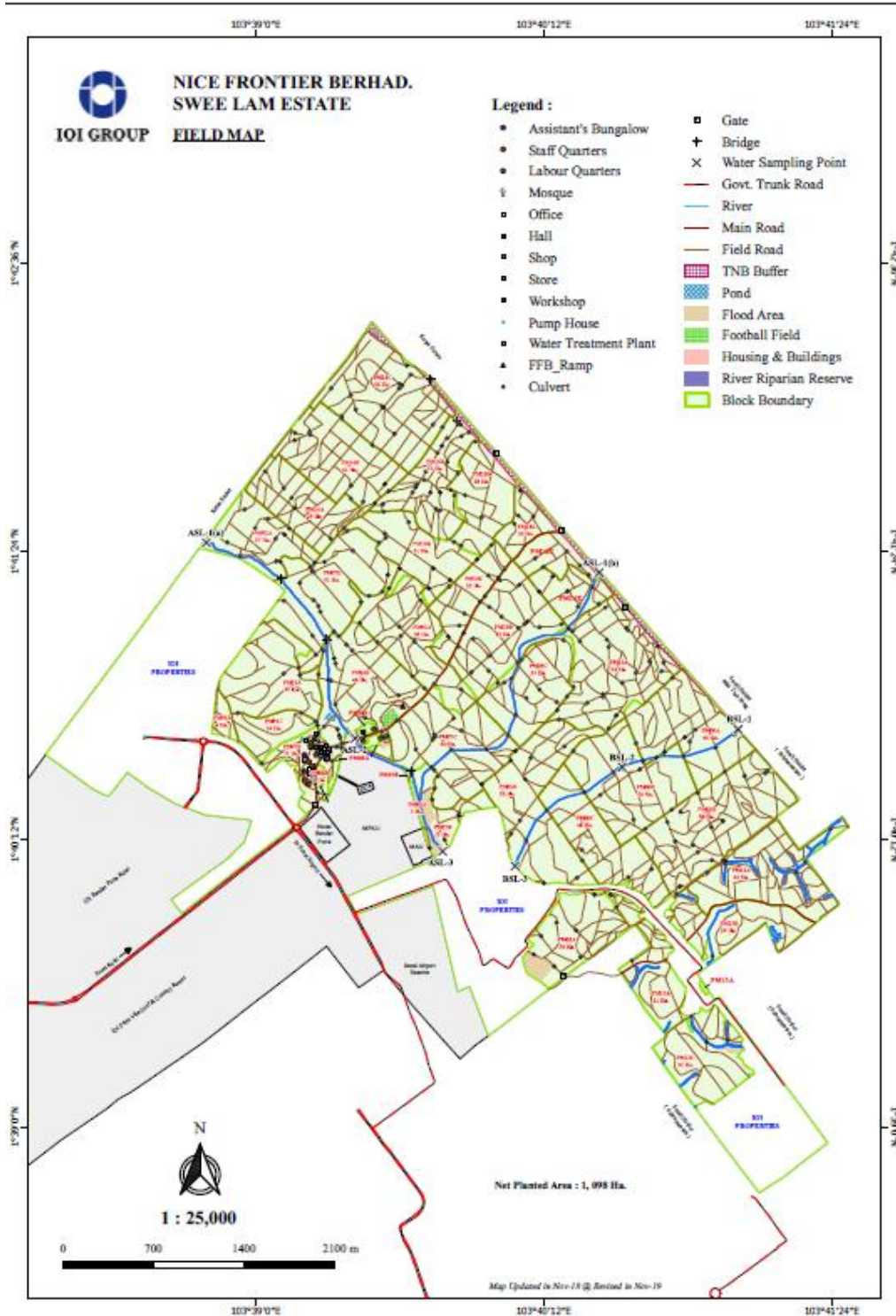
**Pamol Barat Estate**



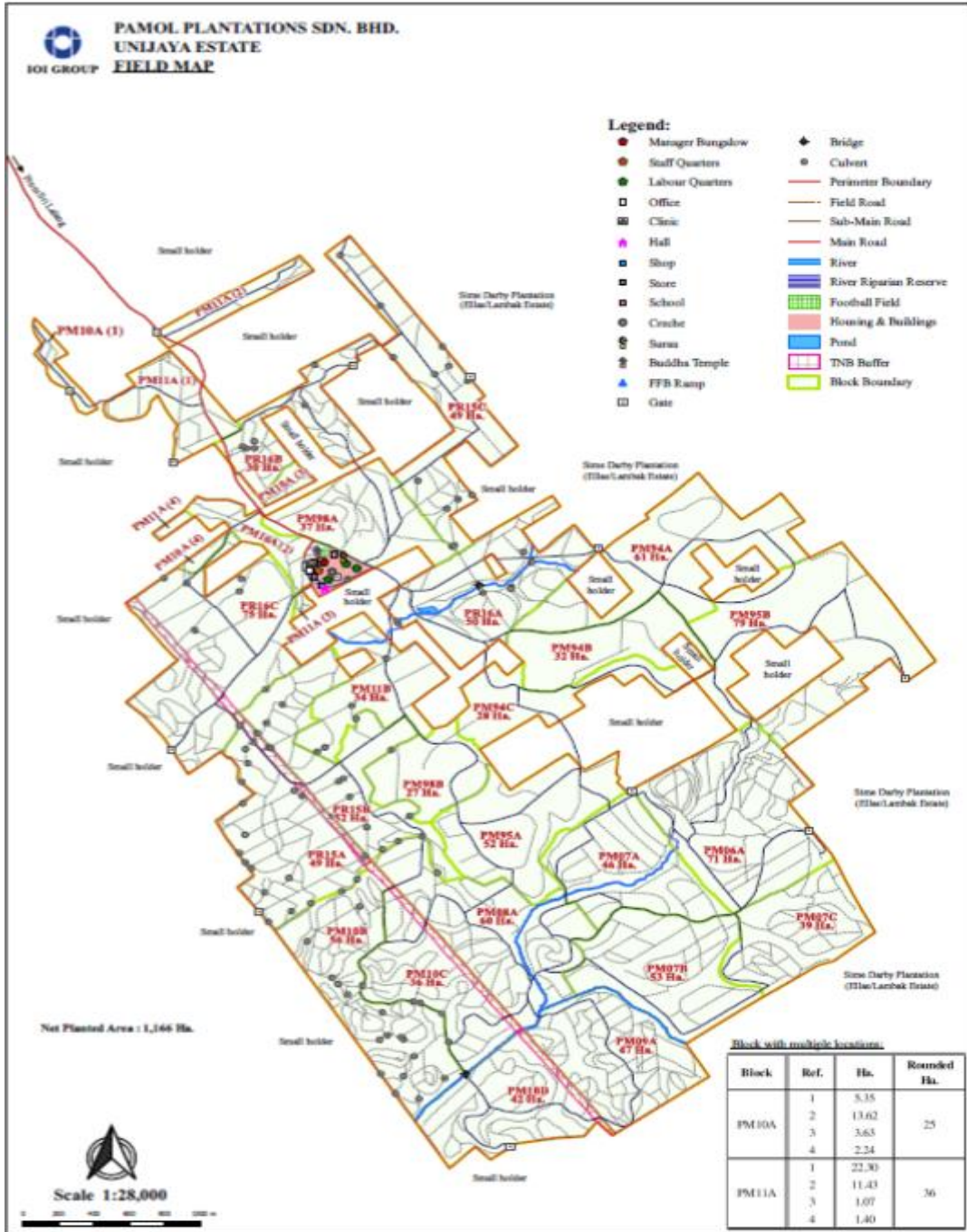
**Pamol Timur Estate**



Swee Lam Estate



Unijaya Estate



**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

**Appendix E: List of Smallholder Registered and/or sampled**

Not applicable

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
					<b>Total</b>				
Note: * are smallholders sampled in this audit.									



## Appendix F: 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
ISS	Independent Smallholder Standard
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