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PUBLIC SUMMARY REPORT

RSPO FOURTH ANNUAL SURVEILLANCE ASSESSMENT (ASA4)

IOI Group Sakilan Palm Oil Mill and Supply Base

Sandakan, Sabah, Malaysia

Report Author:

Senniah Appalasamy – February 2014

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SUMMARY

BSi has conducted the Fourth Annual Surveillance Assessment (ASA4) of IOI Group's Sakilan Certification Unit's operations located at Sandakan, Sabah, Malaysia comprising one mill, three company's own oil palm estates, support services and infrastructure. BSi concludes that IOI Sakilan operations comply with the RSPO requirements [RSPO P&C MY-NI 2010; RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance; and Supply Chain Certification Standard: November 2011, Module D – CPO Mills: Segregation

BSi recommends the continuation of the approval of IOI Sakilan operations as a producer of RSPO Certified Sustainable Palm Oil.

ABBREVIATIONS USED

ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CAP	Corrective Action Plan
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
IPM	Integrated Pest Management
MSDS	Material Safety Data Sheet
MY-NI	Malaysian National Interpretation
OSH	Occupational Safety and Health
PK	Palm Kernel
PPE	Personal Protective Equipment
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure

1.0 SCOPE OF CERTIFICATION ASSESSMENT

1.1 Identity of Certification Unit

The Sakilan palm oil mill and estates are located at Sandakan, Sabah, Malaysia (Figure 1). Sakilan and Linbar 1 estate maps are provided in Appendix F and G. The oil mill is central to the Certified FFB supplying estates which are located at Sandakan as well. The GPS location and mill's processing capacity is shown in Table 1.

Table 1: Mills GPS Locations and Capacity

MILL	EASTING	NORTHING
Sakilan (Capacity: 40 mt/hr)	117° 50' 37"	5° 50' 21"

1.2 Production Volume

The estimated tonnages reported for the ASA4 and the actual production for the period covering ASA3 are provided in Table 2. The projected tonnages for the 2014 period of the Certificate are based on the annual budget covering 12 months.

Table 2: Production tonnages

Sakilan Mill	Estimate at ASA3 (2013)	Actual for the ASA3 Period (2013)	Projected for ASA4 (2014)
CPO	28,000	27,312	28,000
PK	7,350	7,271	7,300
OER	21.37	21.12	21.58
KER	5.61	5.62	5.54

1.3 Certification details

RSPO Membership No: 2-0002-04-000-00
 BSI RSPO Certificate No: SPO 543161
 Date of Initial Assessment: 25 – 28 November 2008
 Date of Certification: 8 March 2010
 Date of ASA1: 25 -28 January 2011
 Date of ASA2: 13 – 17 February 2012
 Date of ASA3: 25 - 27 February 2013
 Date of ASA4: 17 – 20 December 2013

1.4 Description of Supply Base and Supply Chain

The supply base which supplying the certified FFB is comprised of three IOI owned estates that supplying 100% of the certified FFB processed at the Sakilan palm oil mill. All of the supply base estates are RSPO-Certified. The annual actual FFB production for the period covering ASA3 and projected for the ASA4 period are listed in Table 3. The projected tonnages were based to the potential yield achieved due to planting material, age profile of palms and favourable weather condition. Furthermore it is expected about 400ha will come into maturity in 2014.

Table 3: Estate FFB Tonnages Processed

Source of FFB Supply (Estates)	Estimate at ASA3 (2013)	Actual for the ASA3 Period (2013)	Projected for ASA4 (2014)
Sakilan	57,000	54,957	66,400
Linbar 1	26,500	27,389	28,500
Linbar 2	47,500	42,618	47,500
Group Estate*	-	4,320	-
TOTAL	131,000	129,284	142,400

* Syarimo (RSPO Cert. No: RSPO 928388 Exp. Date :19/3/2018)

The projected figures show an increase compared with actual production at ASA3 productions. This is due to in 2014 there will be about 400 ha will come into maturity. The age profile of the palms is shown in Table 4a. The areas of mature and immature palms are detailed in Table 4b for each of the estates.

Table 4a: Age Profile of Palms

Planting Year	Age (years)	% of Planted Area
Before 1987	Above 26	0
1988-1992	21 – 25	34.28
1993-2002	11 – 20	41.13
2003-2009	4 – 10	0
2010-2013	0 – 3	24.60

Note: Planting after 2005 is re-planted area.

Table 4a shows the total certified area (7,136.54ha) and total planted area (6,436ha). The remaining area includes infrastructure and biodiversity area.

Table 4b: Estates and Areas Planted

Estate	Mature (ha)	Immature (ha)	Infrastructure and others area	Total Certified Area
Sakilan	2,142	0	154.37	2,296.37
Linbar 1	996	1,456	176.17	2,628.17
Linbar 2	1,715	127	370.00	2,212.00
TOTAL	4,853	1,583	700.54	7,136.54

1.5 Other Certifications Held

The Sakilan Palm Oil Mill and supply base holds ISCC certificate (No. EU-ISCC-Cert-DE 100-20120284 valid until 27 December 2014)

1.6 Organisational Information / Contact Person

Head Office:

IOI Corporation Bhd , Level 8, Two IOI Square, IOI Resort, 62502 Putrajaya, MALAYSIA.

Contact Person:

Mr Too Heng Liew (Head of Sustainability)

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Sakilan Certification Unit's contact details:

Contact Person: Mr. Yeap Su Jeen

Sustainability Manager

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1.7 Progress against Time Bound Plan

IOI Corporation Berhad owns and operates 14 Palm Oil Mills and 81 estates in Peninsular Malaysia and Sabah (additional mill and estates from new acquisition). The FFB from three IOI Estates Sugut (Sabah), Sejan and Tegai Estates (Sarawak) are processed at Mills owned by other companies who have not yet set a target date for RSPO Certification of their mills. IOI Corporation Berhad has implemented program to achieve RSPO Certified Sustainable Palm Oil for all of its 12 Oil Mills.

An update on the on-going mediation process between IOI-Pelita and Long Teran Kanan (LTK) was explained by the Head of Sustainability Department. The detail of the chronology of the case was briefly recorded in the ASA3 Public Summary Report. RSPO Dispute Settlement Facility (DSF) has been requested to step-up pre-mediation works with the parties, with a view to bringing the parties to the table by July 2013, for further mediated negotiations to resolve the conflict. The Complaint Panel has agreed to lift the suspensions of new certifications by IOI with the exception of IOI-Pelita Plantation (Sarawak), which will not be certifiable until this dispute is being resolved. For more information about the dispute and historical updates can be found on following website: http://www.rspo.org/en/status_of_complaint&cpid=4

There was a latest meeting held on 10th January 2014 between IOI representative, RSPO representative and mediator representing the LTK community to discuss the resolution process of the issue. The outcome of the discussion is still pending.

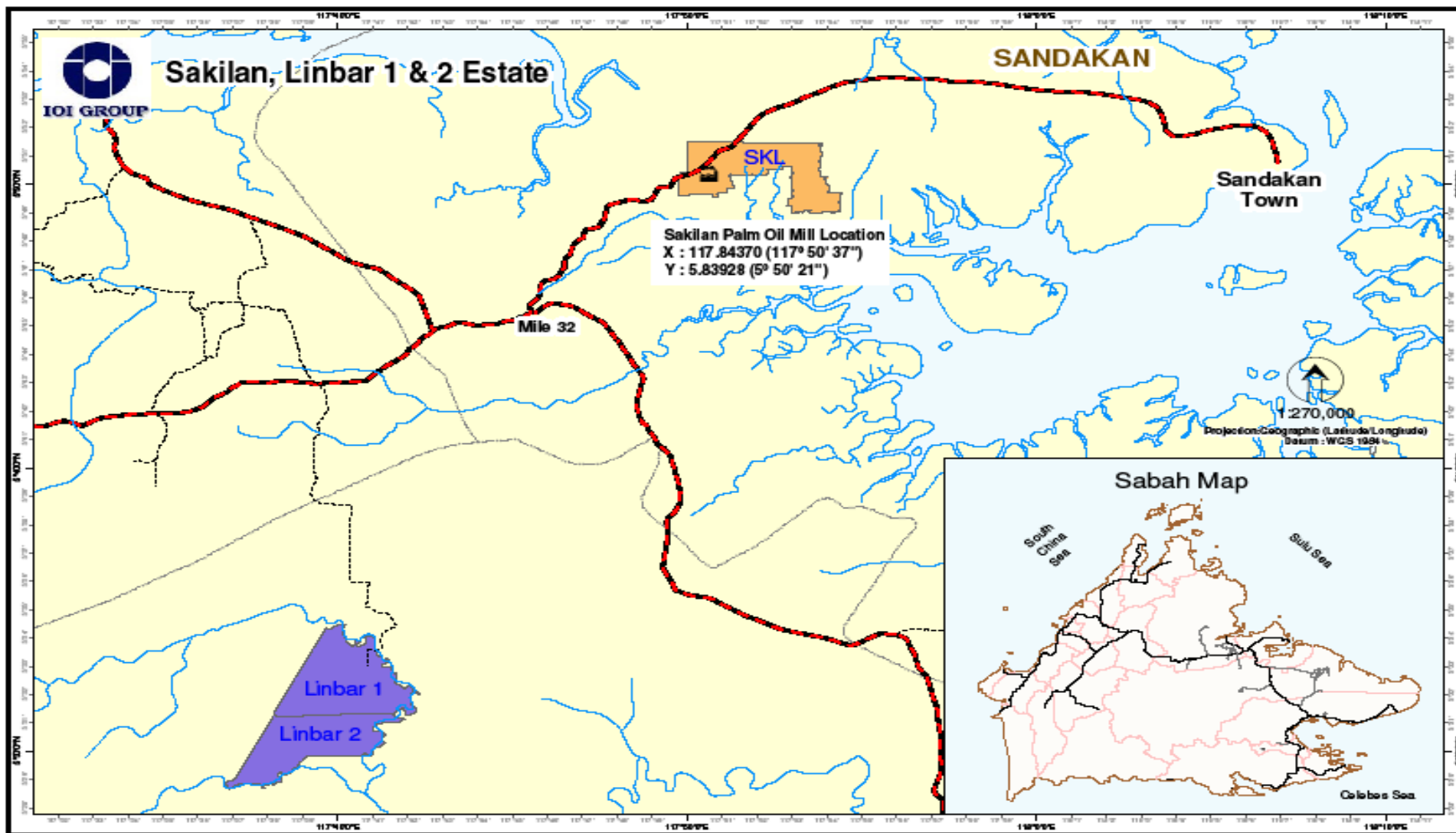
Review of the Time Bound Plan and compliance to partial certification requirements were assessed on 15th January 2014 at the IOI Head Office. Document review and interview with the Sustainability Department Head and his assistants were conducted. It was made known that recently IOI acquired Unico Desa Plantation in Sabah which consists of two palm oil mills. As per the RSPO requirement for new acquisition under rules for partial certification, IOI is committed to certify these two palm oil mills by end of 2016. Apart from this inclusion of additional unit, there is no other alteration to the Time Bound Plan. The Time Bound Plan to certify the plantations in Indonesia remains as 2016 which is considered as challenging because there is no palm oil mill (Certification unit) at the moment. BSi considers IOI's Time Bound Plan to conform to the RSPO requirements for Partial Certification subject to the condition and resolution of the IOI-Pelita issue.

IOI has conducted due diligence on the present plantation operations and provided positive statement that there is no known labor dispute that are not being resolved through an agreed process, legal non compliances, land disputes (other than the LTK disputes) and replacement of primary forest or any area containing HCVs since November 2005. BSi has reviewed IOI's Time Bound Plan and considers the programme to be challenging to implement as it will require a uniform, across the geographic spread of its operations in Peninsular Malaysia, Sabah and Indonesia. The latest progress of the Time bound Plan is as per in Appendix E.

Progress of Associated Smallholders/Outgrowers towards RSPO Compliance

Sakilan palm oil mill does not purchase FFB from smallholders or out-growers. There is no associated smallholder or out-growers.

Figure 1: Location Map of Sakilan Palm Oil Mill and Supply Base in Sandakan, Sabah, Malaysia.



(Note: Estate field maps are provided as Appendix F and G)

2.0 ASSESSMENT PROCESS

2.1 Certification Body

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BSi is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSi Standards is the UK's National Standards Body. BSi provides independent, third-party certification of management systems. BSi has a Regional Office in Singapore, and an Office in Kuala Lumpur, Jakarta and Bangkok.

2.2 Qualifications of the Lead Assessor and Assessment Team

Senniah Appalasamy – Lead Assessor

He holds degree in Resource Economics from Agriculture University of Malaysia. He has vast experience in Plantation crop management covering oil palm plantation, rubber, cocoa and pepper for more than 10 years. He is also experience in manufacturing sector as a quality controller and production management. He is involved in RSPO implementation and assessment since 2008 as a team member and subsequently as a lead auditor with RSPO approved certification body covering assessment with RSPO P&C, RSPO SCCS and RSPO NPP in Malaysia and Indonesia. He has completed ISO 9001:2008, RSPO SCCS awareness training, RSPO Lead Auditor Training Course and International Sustainable Carbon Certification (ISCC) Lead Auditor training. Beside RSPO, he is also qualified as ISCC lead auditor. He have experience in other standards i.e. Global Gap Option 1 and 2 (Fruit, vegetable and aquaculture) and GMP B+ as team member.

Muhammad Haris Bin Abdullah–Team Member

He graduated from the Open University Malaysia with a Bachelor of Business Administration (Hons) Majored in Human Resource Development and currently pursuing his Master's Degree in Business Administration from the University Utara Malaysia. He has completed RSPO Lead Auditor Training Course. He also has more than 3 years working experience in oil palm plantation and conducting social impact assessments of agriculture, agriculture best practices, and environmental impact assessment and workers welfare. He had assisted with conducting audits of oil palm plantation for more than 8 companies against the RSPO P&C in Indonesia and in Malaysia for the past 4 years. During this assessment, he

assessed on the aspect of Legal, Social and community engagements, Stakeholders consultation, and workers welfare.

Nabila Seth – Team Member

Nabila Seth Bt Mohd Niven is a fulltime employee with BSI Services Malaysia. She graduated in Business Administration from University Technology Mara, Malaysia. She attended internal RSPO training in September 2012. Currently she is an ISO 9001:2008 lead auditor with BSI. She has audited more than 17 companies against the ISO 9001 standard for the past 2 years and recently involved as Social Auditor during the RSPO Assessment to assess the social aspects and gender issues. She has audited four different companies and covered more than 15 audit days.

This summary report was reviewed by Mr. Aryo Gustomo. He is one of the BSI internal reviewers who has involved in report reviewing. He has completed RSPO Lead Auditor training. Certification decision was made independently by the BSI Indonesia's Operation Director.

2.3 Assessment Methodology, Programme, Site Visits

The Initial Certification Audit was conducted between 25th and 28th November 2008. Certificate issuance was on 08 March 2010. Subsequently the Annual Surveillance Assessments was conducted as per below:

- i. ASA1 was conducted from 25 - 28 January 2011.
- ii. ASA2 was conducted from 13 - 17 February 2012.
- iii. ASA3 was conducted from 25 - 27 February 2013.

The Fourth Annual Surveillance Assessment (ASA4) was conducted on 17 - 20 December 2013. The audit programme is included as Appendix C.

A separate meeting with the Head of the Sustainability at the IOI Head office was held on 15 January 2014 to further discuss about progress of IOI's Time Bound Plan and assess issues related to partial certification. This information is incorporated under section 1.7 above.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (two estates were sampled: Sakilan and Linbar 1 Estates). A range of environmental and social factors were covered during the assessment. The sampling took consideration of topography, distance from the mill, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews with staff, workers and their families, review of documentation and monitoring data. Checklists of standard requirements were used to guide

the collection of information. The comments made by external stakeholders were also taken into account in the assessment.

The Nonconformities that were assigned and the Observations that were identified during the ASA3 were followed up to check the effectiveness of corrective actions. The ASA4 findings are detailed in Section.

This report is structured to provide a summary for each Principle, together with details for selected Criterion and Indicators. The assessment was based on random sampling; therefore nonconformities may exist that have not been identified.

Mr. Aryo Gustomo, who has been involved in BSi RSPO activities and one of the BSi internal reviewer, reviewed this report for conformance with BSi Procedure, RSPO Certification System and RSPO Procedure for Annual Surveillance Assessment.

2.4 Stakeholder 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 Sakilan Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. 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 Appendix D.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

As outlined in Section 2.3, objective evidence was obtained separately for each Principle, together with details for selected criterion and indicators for the Mill and the Estates sampled. The results for each selected criterion and indicator from each of these operational areas was summarised to provide an assessment of

overall conformance of the Company's operations with conclusion of each criterion. A statement is provided for each of the Indicators to support the finding of the assessment team.

During the ASA4, there was a Major nonconformity raised against Indicator 4.4.1 of RSPO P&C MYNI and seven Observations/Opportunities for improvement were identified. IOI Sakilan operations have prepared a Corrective Action Plan for addressing the identified major nonconformity that was reviewed and accepted by BSi. The IOI Sakilan operations had also submitted evidence for closing major nonconformities that was reviewed and accepted by BSi. The immediate and proactive implementation was carried out on 18 and 19 December 2013 while the audit team was on-site. The audit team visited the location on 19 December to verify and confirm the implementation on-site. Long term Corrective Action Plan for enhancement is also in place. The Audit Team has reviewed and accepted the Sakilan Certification Units's implementation and action taken to address major nonconformity. The major nonconformity is closed after finalising the other relevant documentations. The major nonconformity was closed on 17 February 2014.

All the nonconformities and observation raised during the ASA3 were followed up to check the effectiveness of corrective actions and to confirm that it remains closed. The details are provided in Section 3.3.

BSi recommends continuation of Certification for Sakilan palm oil mill and supply base operations as a producer of RSPO Certified Sustainable Palm Oil.

PRINCIPLE 1: Commitment to Transparency

Criterion 1.1: Oil palm growers and millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages & forms to allow for effective participation in decision making.

Sakilan palm oil mill and supply base continue to maintain a system to response information request from stakeholders. Request received are responded by the relevant managers from mill and estate. Sakilan palm oil mill and supply base maintains a request book to record all request and complaints and action taken were recorded with the dates which called "Green Book".

All requests were promptly responded. Stakeholders interview confirm that response are received within two weeks. During the ASA4, re-interview with the SK Sakilan Desa teacher and head of the village confirmed that the school and the village community received timely responses for their request. The Sakilan Mill and supply base estates record request and responds for each individual stakeholder's e.g: School, MPOB, and workers. These records are maintained similar to last assessment.

Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

Sakilan palm oil mill and supply base maintained public documents such as land titles, health and safety plan, environmental and social impact assessment and management plan, continuous improvement plan and other related documents. These records are maintained for a minimum of five years and government related documents maintained as per requirement of the law. Company consistently implement the procedure related to publicly available document.

Previous environmental aspect-impact assessment was reviewed on 15 February 2013. Next review is on January 2014. Safety and Health Policy and plan for 2013 is still applicable until end of the year. The review due in January 2014 as well to cover all the OSH activities and Social Impact Assessment is was reviewed on February 2013. Next review will be in January 2014.

PRINCIPLE 2: Compliance with Applicable Laws and Regulations

Criterion 2.1 – There is compliance with all applicable local, national and ratified international laws and regulations.

All operating units have an updated list of legal requirements, latest update on 2 July 2013. The latest update includes the minimum retirement age. Mechanism to ensure all relevant legal requirements are complied is implemented through “Mechanism on Tracking of Law Changes” (file no. A.2) the mechanism includes list of laws, regulation reference, permit, license to manage and person responsible. The Sustainability team ensures the mechanism is implemented properly by checking regularly through internal check and audits. In addition, each operation has a List of Licenses showing the expiry dates and these are updated. For Example:

For the estates the MPOB license (Akta Lembaga Sawit Malaysia 1998):503335002000 valid till 31/7/2014, Air compressor permit – SB PMT 1436 valid till 21/01/2015. Approval to employ foreign workers: JTK.282187H valid for the period of 8/5/2013 till 7/5/2014 for 216 workers. Diesel storage permit (PPDNKK.SDK.04/2002 (SK) valid until 17/11/2014,

For the palm oil mill the DOE licence: No. APU.2 (J83/136/99) valid until 30/6/2014, MPOB license (500293404000) valid until 30/11/2014, weighbridges permit: B414371 valid till 25/7/2014, diesel engine permit for 19,000litre, serial No.: S003456 valid till 18 Nov 2014, diesel storage license S003921 valid until 17/11/2014 etc.

Criterion 2.2 – The right to use the land can be demonstrated and is not legitimately contested by local communities with demonstrable rights.

Land titles are available. Sakilan Estate covering total hectares of 2,296.37; Land title of Linbar 1 Estate covering total area of 2,628.17ha.

Land tenure history and legal ownership are fully recorded. Land title clearly stated the land term as oil palm plantation. Review on two estates sample confirmed both are hold legal land ownership. Linbar 1 estate has country lease no. 095311667 for 2628.17ha. No changes in Sakilan estate’s lan title which holds 3 land titles covering total hectares of 2,296.37 with land title No: 075471242, 075471260 and 075471288. The planted area is 2,142 ha.

The land is not encumbered by Customary Rights and the right to use the land is not disputed. This was confirmed during the local stakeholder consultation.

Maps indicating the neighbouring estates, forest reserve and small holders are available to clearly show the neighbouring entities. Boundaries are marked with red packs and visibly maintained. Review on documentation of two sampled Estates found the maps showing the locations of boundary stones that have been physically located and marked. The boundary stones were physically verified during the field visit.

Criterion 2.3 – Use of the land for oil palm does not diminish the legal rights of other users without their free, prior and informed consent.

The mill and supply base estates are located on country lease land that IOI acquired from government. The operating unit does not restrict access through the estates, except in relation to trucks passing through the plantation which require prior permission. Interview of local community representatives confirmed there is no land dispute or any claim of customary land within the plantation. Interview with local villager during ASA4 confirmed no land dispute within the estate.

PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability

Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.

Annual budget is available with 5 years business management plan consisted of crop statement by year of planting such as crop projection 2013/2014 to 2017/2018. The business plan covers crop projection. OER, KER, CPO production, PK production, human resources requirement, costing, capital expenditure projection and consideration for depreciation calculation.

The replanting program at Linbar 1 which was schedule in 2013 was completed at an area covering 236ha. Yearly review conducted based on palm performance indicator such as production trend and capacity fulfilment of the palm oil mill.

PRINCIPLE 4: Use of Appropriate Best Practices by the Growers and Millers

Criterion 4.1: Operating procedures are appropriately documented and consistently implemented and monitored.

The palm oil mill has a mechanism for monitoring effectiveness of procedures. The shift supervisors check that all the log books and records and ensure it is as per the StOP and completed for all StOP's when required by the schedule which depends on work stations. This is done by signing the log book, a copy of which is kept by mill management and also includes planned scheduled inspections. The operators at the mill had completed the required log sheets at each station on the required timetable. These log sheets are collected and reviewed on a daily basis. The log sheets are used to identify breakdowns and cases of wear and tear where breakdowns may occur. Any breakdowns, stoppages or major services are recorded in both the log books for each area and in the maintenance records.

Sakilan's operations refer to Group Standard Operating Procedures (StOPs) for Estate and Mill Operations. The procedure comprise of all activities applicable for the mill and each particular estate which covers fretilizer application for mature and immature palm, EFB mulching, POME application, fertilizer sampling tests. Planning and organization of fertilizer application, pest and disease control (rat control, bag worm, rhinoceros beetle control), harvesting activities (FFB harvesting, monitoring on FFB quality, pruning, FFB evacuation and transport, buffalo assisted harvesting system) Road maintenance Workshop, Buffalo healthcare, Foliar sampling.

Record of each operation activity was recorded under Monthly Report of estate and mill. The monitoring is carried out by the plantation general manager and mill general manager beside internal audits.

Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility, to a level that ensures optimal and sustained yield.

Fertilizer recommendation is based on Leaf and soil sampling and visual analysis conducted by agronomist annually. The latest result for leaf sampling was used for formulating the fertilizer recommendation for the year 2013. The next recommendation is due in early 2014.

Organic fertilizers such as EFB and POME applied as per recommendation from the IOI Research Centre. EFB applied around 40 – 45mt/ha but has been on reducing trend because the EFB were utilized as fibre for boiler fuel by the mill. POME applied into land as part of land application covers 126 ha in Sakilan Estate and maintained.

Estate manager alongside with Research Centre carried monitoring of fertiliser, EFB, and POME application once a month. Record held on Estate Monthly Report, keep in Estate manager office.

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

No changes noted on the soil type. The soil map showing soil type and the topography for each estate is available. Area with steep slope is not planted and un-plantable area was identified on the map. This area was designated as conservation area. Based on soil map and field visit there is no peat soil in Sakilan and Linbar 1 Estates. The predominant soil type is under category of Kumansi (sandy-loam) characteristic.

Based on field observation during the field visit, it was noted that terraces are constructed and maintained on certain slope area through water conservation terraces and avoid surface soil run-off. Frond stacking across contour line implemented to reduce surface run-off and erosion. Legume cover crop with *mucuna* planting and natural vegetation kept as no barren soil observed.

Road maintenance programmes for all estates were documented and reported in Road Maintenance Programme since June 2013. However soil type and climate condition are always challenge for road maintenance especially during heavy rain. During the ASA4 the weather was dry and it was noted that road condition were much improved and better compared to the previous assessment.

Criterion 4.4: Practices maintain the quality and availability of surface and groundwater.

The natural vegetation such as soft weeds and grass is maintained as protection from erosion and minimising sedimentation into the waterways. There is no indication of spraying and fertilizer application along the riparian at sakilan estate and majority of the Linbar 1 estate are maintained and protected well. Buffer zone demarcated through paint on palm trees and signs erected to warn the worker not to spray and put fertilizer beyond the buffer zone. No bunds/weirs/dams were constructed across the main waterways in the estate. Interview with spraying workers, the company's policy of protection on riparian area is well understood.

However, during the field visit at the Linbar 1 estate, it was identified an isolated incident where a small portion of the riparian was encroached and cleared by estates worker for gardening. This was immediately shown to the management and the management took immediate action. However, a nonconformity was still raised a sper below.

CAR Ref: 1007386M0: 4.4.1 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estate.

The riparian area along the Sungai Lokan was not maintained as per RSPO requirement and company's HCV management plan. A small portion of the riparian was encroached and cleared by estates worker for gardening. Visit to riparian area along the Sungai Lokan

at field 12C noted that some portion of the riparian area was cleared for gardening and planted with vegetables. There is a temporary shade erected by the worker. The riparian area is not maintained as per the action plan dated 20/11/2013. The major nonconformity was closed on 17 February 2014. See section 3.2 below.

Estate conducted monitoring on waterways, including water stream of Bulu river in Sakilan Estate and Lokan River in Linbar 1 Estate. The water sample was taken from upstream and downstream and tested by Enfirst Laboratories Sdn Bhd twice a year. Record of water quality test result is maintained. Review on record of water sample reported on 30 November 2013, for period of July 2013 – November 2013. The analysis result shows the parameter tested (such as dissolved oxygen, biological oxygen demand, chemical oxygen demand, ammonia nitrogen, total suspended solids and pH) are within the limits of Class III of Interim National Water Quality Standards (INWQS), where this means the activities of the mill and estates did not have any negative effects on the water sources.

Sakilan palm oil mill's effluent discharge is in compliance with DOE license requirement of below 50mg/L for treated effluent discharge in relation to BOD. It is also within the limits for other indicators such as Oil & Grease and Suspended solids. The test of effluent was conducted by Dynakey Laboratories Sdn Bhd. Test Report and Certificate of Analysis was dated 29 October 2013. Mill and estates maintained a monthly monitoring of rainfall data, record held on file "Rainfall Report" and up to date until 17 December 2013. Record shows less rain in the month of December 2013. Sakilan mill has maintained monitoring of daily water usage for mill processing. An average of 1.10 – 1.16 m³ water is used to process per mt of FFB.

Water management plan is available Sakilan palm oil mill and supply base under IOI Sakilan Group. This was reviewed and prepared on 2 December 2013. The water management plan for consist of soil moisture conservation through pruned frond inter row, terrace, buffer zone of stream and river, land irrigation, and water for domestic use. Field visits to Linbar 1 estate and Sakilan estate confirmed the water management plan was implemented accordingly.

Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

Bothe estates visited have continued to implement biological control pest in the plantation. Bothe estates sampled introduces barn owl as a biological control for rat. However the success rate of owl occupancy is still low and below 30%. Rat damage censuses are carried out during the bunch inspection in the field to identify the actual damage level. Rat bait is used only used when the damage exceed the threshold level. Both estates committed to prioritize biological pest control rather than chemical means. Chemical will be applied when the pest census result exceed allowable limit. Beneficial

plants such as *Turnera subulata*, *Antigonon* and *Cassia* established as biological control over leaf eating pest.

Monitoring of pesticide use is held by estates in term the pesticide usage units per hectare. Record shows a.i/ha for the last 11 months was 0.256L/ha.

Criterion 4.6: Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives and this is documented.

General guidelines of herbicide or mixture of herbicide for general weed control in circles and path of oil palm stated in Group Standard Operating Procedure (StOP) for Weeding. Justification of agrochemical used listed on General Guidance of Herbicide/mixture for common target weeds. Register of Chemical Hazardous to Health latest update was on 5 February 2013. Since then there were no new agrochemicals purchased. The verification of stock records and store visit confirms that there are no new agrochemicals received.

Inspection of the agrochemical stores and records of Sakilan and Linbar 1 estates confirmed the estates hold and use only chemicals that are registered under the Pesticides Act 1974. There is no Class 1a or 1b agrochemical stored in the chemical store or used by the estates. MSDS are available at store.

Observation 1 (4.6.4): Sakilan Mill and Linbar 1: All the MSDS are available and store clerk understand. The MSDS are in English. Bahasa version will be added useful.

Medical Surveillance is conducted for agrochemical applicators at the clinic on a monthly basis and annually by the Occupational Health Doctor as per the CHRA. Records are maintained by the hospital assistant. The latest medical surveillance was conducted in August 2013. Interview with agrochemical applicators and chemical store clerk confirmed that they are screen through for medical fitness. No medical problems were noted.

Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented.

Safety Management Plan for 2013 is in place, prepared on January 2013. The next review is due in January 2014. The 2013 plans were implemented and records are available includes training, meeting, accident monitoring, PPE implementation, work site inspection etc. This was sighted in Sakilan Mill, Sakilan and Linbar 1 Estates.

Mill and estates operations are risk assessed and documented through HIRARC. Re-training is provided to employees involved in accident or near miss cases. Based on field inspection, PPE used by all employees suitable to cover the risk of the work performed. The PPE was provided free

of charge. Records are maintained when the PPE is issued to workers. However, an observation for improvement was raised at Linbar 1 estate.

Observation 2 (4.7.1i): Linbar 1: All the agrochemical applicators wear full and complete PPE including rubber boot. The record of PPE issuance available but was not indicating the issuance date of Rubber Boot for the agrochemical applicators.

Meeting records and interview with OSH committee members at the palm oil mill and estates confirmed OSH meeting conducted quarterly. The latest meeting was held on 24 September 2013 and 4 December 2013. Record of work accident kept under "Daftar Kemalangan, Kejadian Berbahaya, Keracunan Pekerjaan dan Penyakit Pekerjaan" year 2013. Zero fatal accidents recorded from January 2013 – November 2013. Internal accident Reporting was sent to head office. Yearly reporting to DOSH was sent to regulatory body on 11 January 2013.

Reviewed on workers profile records found all the workers are covered by the accident insurances. Malaysian workers are covered by SOCSO or Perkeso (*Pertubuhan Keselamatan Sosial*) and MSIG Insurance. Foreign workers are covered by MSIG foreign workers compensation scheme, Policy Number DJ-08543335 expires 30/09/2014.

Criterion 4.8: All staff, workers, smallholders and contractors are appropriately trained.

All operating units carry out evaluation related to Occupational Health and Safety under OSH training analysis. The record of training evaluation and analysis conducted on 23 January 2013 is still applicable for the ASA4. The next evaluation is due in January 2014. During the interview with staff and workers it was noted that staff and workers are able to demonstrate their understanding on the work instruction and procedures for safe working practice and emergency situation for each work. Training program also includes the contractors especially transporters.

Safety and Health Training programme 2013 as carried out as per palm for chemical handling, first aid, SOP harvesting, MSDS/CSDS, SOP Spraying, SOP manuring, ramp operator, FFB loader, tractor passenger, Emergency Response Plan, tractor driver, etc. The training programme completed with the targeted worker, hour, date and trainer.

Record of training includes working procedures, instruction and on safety and health training. Trainings are recorded each time it is conducted on-site.

Sample of training includes record with the training material, emergency procedure, photograph, list of attendance such as:

Contractor training dated 6 November 2013, RSPO Requirements and SCCS Training – 6 November 2013. Worksite Inspection and Training – 18 November 2013.

Schedule waste management Training – 25 October 2013. Workshop SOP and Safe working practice training – 13 October 2013. Personal Protective Equipment usage training – 13 October 2013. StOP for boiler – 24 October 2013. MSDS understanding Training – 23 June 2013.

Although all the records are in place and verified, as an area for improvement, an observation was raised.

Observation 3 (4.8): Sakilan Estate: The Hospital Assistant attended training on chemicals used. There is a delay in providing training to Hospital Assistant's assistant on the chemicals used.

PRINCIPLE 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored to demonstrate continuous improvement.

Environmental Impact Assessment management Action Plans and Continuous Improvement Plans was reviewed for the year 2013 on 15 February 2013 for its implementation of 2013. The record was held in the Mill and Estates offices. The recent review was conducted on 29 November 2013.

The time table for the improvement contains action plans for improvement of environmental performance to cover each of the significant impacts identified. The environmental aspect-impact identification includes recommendation for environment improvement. The status of implementation from action plan, monitoring, and continuous improvement plan were recorded and reported to regulatory department should the records are required by the authorities such as BOD reporting for effluent, smoke emission reporting etc.

Criterion 5.2: The status of rare, threatened or endangered species and high conservation value habitats if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations.

Similar to previous year, at the time of the original development all of the land within the Estate leases was planted to oil palm except for a number of small Government Riparian Reserves and steep hillsides. IOI has carried out an assessment of the possible presence of HCVs within and adjacent to the Estates. The report was held in each Estate office. HCV Assessment report was prepared 22 September 2010 by internally qualified HCV assessor from the Sustainability Department.

IOI management as a group and local operating units discourage illegal or inappropriate hunting and collection activities. Awareness created through signboard erected with wordings "no hunting" and communicating the importance of wildlife to workers

and conduct regular patrol. Estate management developed "patrolling book" in which records observation noted during patrolling by staff. Based on worker interview, confirmed hunting and poaching is prohibited.

Criterion 5.3: Waste is reduced recycled, re-used and disposed of in an environmentally and socially responsible manner.

Sakilan palm oil mill and supply base continuously managing scheduled waste stores at the mill and each of the estates. Maximum storage period is complying to regulation. Storage is kept less than 180 days in accordance with the requirements of the *Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005*.

Recycle waste record, showing the amount of plastic, glass, aluminium and paper as per October 2013. Schedule waste record, showing the amount of hazardous waste kept in the store follows local regulation and disposed within 6 months. The scheduled wastes consist of used oil, used cotton rags, used oil filter, used battery, empty grease container and used lubricant oil. There was a delay in updating the list although sodium hydroxide empty tube from the laboratory was identified as well.

Observation 4 (5.3.1): Sakilan Mill: All waste products identified. The list of waste identified overlooked the sodium hydroxide empty tube from the laboratory.

The recycled wastes such as plastic (empty chemical container) were sold to contractor 15 October 2013. During the visit to the Sakilan mill's Effluent Treatment Plant's store, it was noted paper is disposed to a carton box due to no proper waste bin. An observation was raised.

Observation 5 (5.3.2): Sakilan Mill: There is no rubbish bin provided at the Effluent Treatment Plant's store. The bund at the diesel tank is starting to have sign of minor cracking.

Criterion 5.4: Efficiency of energy use and use of renewable energy is maximised.

Energy use and efficiency is monitored through daily records of monitoring of boiler fuel and fossil fuel usage. Summary of Boiler Fuel Monitoring and Summary of Fossil Fuel Monitoring since the last assessment shows that the mill has maximised the use of renewable energy. The records were also checked and verified during the internal general manager's visit. The monitoring record for 2012/2013 was completed. The latest record shows renewable energy generated from fibre and shell was 99.86kWh/mt CPO and fossil fuel was 36.13kWh.

Criterion 5.5: Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situation, as identified in the ASEAN guidelines or other regional best practice.

Sakilan palm oil mill and supply base has implemented Zero burning policies in all workplace area at the mill and estates including "no burning" of domestic waste.

Inspection to worker housing Sakilan mill, Sakilan estate and Linbar 1 estates found no evidence of burning waste including domestic waste. Recycling programme for domestic waste is being carried out and also segregation of waste is done before land fill at each collection centre.

Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases are developed, implemented and monitored.

All operating units have Pollution Prevention Plan which incorporated with documented Environmental Impacts Identification and Improvement Plan. The document was reviewed 15 February 2013. The next review is due in February 2014. Inspection confirmed the Mill and Estates have implemented appropriate controls for preventing pollution from point source emissions to air and discharges of wastewater, such as the mill drains.

As per regulation, smoke emission test report at the mill is submitted to DOE every 6 month in accordance to the Environmental Quality (Clean Air) Regulation 1928. Similar to last assessment, the test was conducted by the Green Environmental Services Sdn Bhd. on June 2013 and the latest was on 14 October 2013. Record shows all parameters were complied with the standard requirements. E.g. dust, NOx, Sox, and Dark Smoke.

PRINCIPLE 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers

Criterion 6.1: Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

Initial SIA was prepared on September 2008 with the participation of local community and updated with annual review through similar communication to identify new social impacts. The social action plan was reviewed and updated on 10 – 13 December 2013. Stakeholder feedbacks have been included in the assessment and mitigation plans with the time bound stated clearly.

The meeting was attended by internal stakeholders (staffs and workers) and external stakeholders (suppliers, contractor, village representatives, Government departments, etc). Record of meeting with attendance list and minute of meeting are available as attachment.

Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

Similar to ASA3, the Consultation and communication procedure for stakeholders is maintained through IOI website: www.ioigroup.com otherwise for those who do not have Internet connection follows Stakeholders Request Procedure. Verbal request by phone call IOI Group General Line: +60389478888 or written request to Two IOI Square, IOI resort, 62502 Putrajaya, Malaysia. Written procedure held on file Management Plan point 10.0 Stakeholders Request Procedure. Estate Manager or he appointed Social Liaison Officer is the person responsible for communications with communities and other stakeholders in relation to social issues.

All operating units updating the stakeholder list regularly and the latest updated list dated 7 December 2013. The stakeholder list comprises of suppliers, contractor, NGO's, Government departments, etc complete with address, contact number and persons in charge. Communication and meeting records are kept and filed under "List of Stakeholders and Communication". Latest meeting was conducted on 30 October 2013. However, during the stakeholder consultation by the audit team, there was one supplier said he was not invited. An observation was raised.

Observation 6 (6.2.3): *Linbar 1: Estate sent invitation to their stakeholders to attend the stakeholder meeting and giving the meeting update to those who not attend the meeting to ensure the stakeholders are well informed on any issues, recent operation activity and RSPO related matters. There was one stakeholder not invited – electrical supplier.*

Criterion 6.3: *There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.*

Similar to previous ASA3, grievance procedure was developed and included in the "Management Plan" and implemented. Complaint and grievances have been recorded in "Complaint/Grievance Book" since July 2009/2010. The "Grievance/Complaints" book is used to record all enquiries not only complaints and grievances. Inspection of the records indicated that the system resolved all disputes in a timely manner. There were no any pending issues that need to be verified further.

There were no documented external disputes at the time of the audit. The ECC (Employment Consultative Committee) is open to external parties including foreign workers. It was confirmed during interview that foreign workers have their representatives in ECC. Meeting was conducted on 25 November 2013. It was noted during the interview with ECC members, action have been taken and implemented. The recording and updating was delayed. An observation raised.

Observation 7 (6.3.2): *Linbar 1: The respond from management towards issues discussed during Employee Consultative Committee meeting conducted on November at Linbar 1 Estate yet to be updated although action have been taken and implemented.*

Criterion 6.4: *Any negotiations concerning compensation for loss of legal or customary 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.*

Similar to ASA03, Sakilan palm oil mill and supply base maintained a procedure of "Grievance Procedure of Land Owner Issues" that is applicable for assessing legal and customary land issue. The procedures is available on "Group Social Impact Assessments and Management Action Plan" dated 25 January 2008 since the initial audit and still applicable.

There has been no land issue since the last ASA3. The issues related to the partial certification are explained under section 1.7. During the Sakilan Certification Unit's ASA4, interview with local community confirmed that currently no outstanding land dispute.

Criterion 6.5: *Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.*

All workers have contract agreement stating basic pay, annual and medical leaves, other wages, and overtime claims including probation period of 6 months.

The migrant workers from Indonesia make up the majority of the workforce. Pay and conditions are documented in the employment agreement between the company and workers are comply to RSPO requirement and labour law. Sakilan palm oil mill and supply base follows "Sabah Labour Ordinance (Sabah Cap.67), Amended as at 10.02.2005 by Act A1238) that includes detailed pay and conditions of the contract. Inspection of contracts of both local and foreign workers confirmed that pay and conditions are available in Bahasa Malaysia.

The Pay slips are in Bahasa Malaysia, and interviews with workers indicated understanding of the details of payment in the pay slip. Minimum wage of RM 800 for Sabah is imposed. Review on Workers payslip for the month of September - November 2013 shows that all workers are paid not less than RM 800.

Field inspection to the worker housing complex at Linbar 1 and Sakilan estate confirmed all new brick houses has been completed and meet government regulation.

Criterion 6.6: *The employer respects the right 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.*

There is Employees Consultative Committee available for any collective bargaining through discussion. Workers

are allowed to highlight any disputes or complaints through Employee Consultative Committee (ECC) meeting. Latest consultative meeting in Sakilan Estate was done on the 21st October 2013 attended by 23 workers. Similar meeting was conducted on Linbar 1 Estate, Latest meeting conducted on 5 November 2013 attended by 18 representatives.

Criterion 6.7: Children are not employed or exploited. Work by children is acceptable on family farms, under adult supervision and when not interfering with education programmes. Children are not exposed to hazardous working conditions.

Employees' contracts agreement confirmed that copy of ID for local applicants and passport for foreign worker are checked and verified prior to employment to ensure they comply with the age requirements. Document check reveals that no workers are under age or categorised as child. During field visit children were not observed at any of the working place at both mill and estate. Interview with workers and stakeholders confirmed the understanding of company policy on children workers.

Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age is prohibited.

An equal opportunity policy is in place and displayed at notice board at muster in the mill and estates as a mode of transmitting the information during the morning muster. Interview with male and female workers and staff at the mill and estates confirmed understanding and awareness of the policy. During the ASA4, the audit team did not find any kind of discrimination issue.

Criterion 6.9: A Policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.

Similar to ASA3, a Policy on Sexual harassment approved on 04 January 2008 is in place in workplaces at the mill and estates. A female staff's member has been appointed as gender committee member at every location. The company has developed specific grievance mechanism on sexual harassment and violence in Bahasa Malaysia. Latest Gender committee meeting was done on 30 October 2013 attended by 8 committee members comprise of staff and workers. No negative issue were recorded. Interview with Female workers confirmed understanding of the mechanism and no issue was raised during the audit. The Gender Committee organisation chart was updated on 7 December 2013.

Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.

Sakilan Mill continues to process only certified FFB from company's own estates. No FFB purchased from

smallholders or out-growers. Interview with the FFB transporter and EFB contractor reveals that the contract is clear and payments are made on time as per the contract.

Criterion 6.11: Growers and millers contribute to local sustainable development wherever appropriate.

Stakeholder consultation and documents check reveal that Sakilan palm oil mill and supply base continued to provide assistant for local communities surrounding the operating units such as continue to provide scholarship for the children, provides free treated water and electricity to Sakilan Desa School, donations to village activities and providing free education to employees children through HUMANA School.

Interview with the local community and school headmaster confirmed that there were lot of contributions made by the management towards their development.

Principle 7: Responsible Development of New Plantings

Sakilan Certification Unit and supply base estates did not carry out any new oil palm developments and there are no plans for expansion of oil palm plantings. Therefore Principle 7 is not applicable to this Surveillance Assessment.

PRINCIPLE 8: Commitment to Continuous Improvement in Key Areas of Activity

Criterion 8.1: Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

Sakilan palm oil mill and supply base continually find ways to improve the operation to address any negative impacts identified during the annual review of the environmental and social aspects and impacts.

Use of pesticide is minimised through establishing beneficial plant as a long term preventive measures. No pesticide is used to control the leaf eating pest through the establishment of beneficial plants. Fossil fuel use is continuously minimised through maximising the use of mill by products such as shell and fibre to generate power as a method of self sustainable energy source. It was noted that social action plan is continued to work towards improving stakeholder relationship through engagement and dialogue.

3.2 Detailed Identified Nonconformities, Corrective Actions and Auditor Conclusions

During ASA4, a major nonconformity and seven Observations/Opportunities for improvement were identified. Sakilan Certification Units has immediately submitted corrective action plan and evidence for corrective action taken and implementation to close out the major nonconformity. The immediate and pro-active

implementation was carried out on 18 and 19 December 2013 while the audit team was on-site. The audit team member visited the location on 19 December to verify and confirm the implementation on-site. Long term Corrective Action Plan for enhancement is also in place. The Audit Team has reviewed and accepted the Sakilan Certification Units's implementation and action taken to address major nonconformity. The major nonconformity is closed after finalising the other relevant documentations. The major nonconformity was closed on 17 February 2014.

Major Nonconformity

A major nonconformity assigned against major compliance indicator 4.4.1. The detail of the nonconformity as follows:

CAR Ref: 1007386M0: 4.4.1 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estate.

At Linbar 1 estate, the riparian area along the Sungai Lokan was not maintained as per RSPO requirement and company's HCV management plan. A small portion of the riparian was encroached and cleared by estates worker for gardening. Visit to riparian area along the Sungai Lokan at field 12C noted that some portion of the riparian area was cleared for gardening and planted with vegetables. There is a temporary shade erected by the worker. The riparian area is not maintained as per the action plan dated 20/11/2013.

Corrective Action Plan and implementation:

Linbar 1 estate has immediately submitted corrective action plan and evidence for immediate corrective action taken and implementation to close out the major nonconformity. The immediate and pro-active implementation was carried out on 18 and 19 December 2013 while the audit team was on-site. The audit team member visited the location on 19 December to verify and confirm the implementation on-site. Long term Corrective Action Plan for enhancement is also in place. The Audit Team has reviewed and accepted the Sakilan Certification Units's implementation and action taken to address major nonconformity. The major nonconformity is closed after finalising the other relevant documentations. The major nonconformity was closed on 17 February 2014.

Observation/Opportunity for improvement

There are seven Observations/Opportunities for improvements were identified during the ASA4. The progress with the Observations/Opportunities for Improvement will be checked during the re-certification Assessment. The details of the observation as follows:

Observation 1 (4.6.4): Sakilan Mill and Linbar 1: All the MSDS are available and store clerk understand. The MSDS are in English. Bahasa version will be added useful.

Observation 2 (4.7.1i): Linbar 1: All the agrochemical applicators wear full and complete PPE including rubber boot. The record of PPE issuance available but was not indicating the issuance date of Rubber Boot for the agrochemical applicators.

Observation 3 (4.8): Sakilan Estate: The Hospital Assistant attended training on chemicals used. There is a delay in providing training to Hospital Assistant's assistant on the chemicals used.

Observation 4 (5.3.1): Sakilan Mill: All waste products identified. The list of waste identified overlooked the sodium hydroxide empty tube from the laboratory.

Observation 5 (5.3.2): Sakilan Mill: There is no rubbish bin provided at the Effluent Treatment Plant's store. The bund at the diesel tank is starting to have sign of minor cracking.

Observation 6 (6.2.3): Linbar 1: Estate sent invitation to their stakeholders to attend the stakeholder meeting and giving the meeting update to those who not attend the meeting to ensure the stakeholders are well informed on any issues, recent operation activity and RSPO related matters. There was one stakeholder not invited – electrical supplier.

Observation 7 (6.3.2): Linbar 1: The respond from management towards issues discussed during Employee Consultative Committee meeting conducted on November at Linbar 1 Estate yet to be updated although action have been taken and implemented.

Noteworthy Positive Components

- ✓ The Mill continue to maximised the use of renewable by-products such as shell and fibre for generating electricity by running the steam turbine.
- ✓ Continue to encourage workers to segregate "recyclables" from domestic waste.
- ✓ No complaints or negative feedback received during the stakeholder consultation.
- ✓ The road leading to Linbar 1 and 2 estates are in good condition and this was also confirmed by the local communities and neighboring estate staff. Field visit further confirm that the road is well maintained.

3.3. Status of Nonconformities (Major and Minor) Previously Identified in ASA3

Corrective Actions and implementation for nonconformities identified during the ASA3 has been effectively and consistently implemented and the nonconformity remains closed. All the previous major nonconformity which was already closed during the ASA3 remains closed since 17 April 2013.

Minor Nonconformities

During ASA3, one nonconformity was assigned against Minor Compliance Indicators 2.1.3. IOI has prepared

Corrective Action Plan and Auditor has reviewed and accepted during the ASA3. Implementation of corrective action plan was followed up during the ASA4. The details of the nonconformity and the implementation of the corrective action plans as follows:

A848092/1: (2.1.3) At Linbar 2 Estate, it was noted that the monthly "Health & Mortality return and notification of infectious disease" to the health department was not submitted consistently by the Health Assistant. The last report was submitted on the March 2012. There should be a mechanism for ensuring that this is implemented accordingly.

ASA4 Findings: A new Health Assistant (HA) recruited for Linbar 2 Estate. Linbar 1 Estate Health Assistant assist the HA in Linbar 2 Estate and ensure that the records are duly submitted. The Senior Medical Assistant for IOI Ladang Sabah group together with the estate managers also helps to ensure that the records are submitted monthly. Monthly return dated since 03/2013 until 11/2013 is available and verified during the ASA4. The minor nonconformity was closed on 17/12/2013.

Review of progress with Observations/ Opportunities for improvement identified during ASA3

There are Eight Observations/Opportunities for improvements were identified during the ASA3. The progress with the Observations/Opportunities for Improvement was checked during the ASA4. The details as follows:

OBS1 (4.3.3): Consideration should be taken to provide analysis of water quality test if any parameter tested above the standard and prepare the action plan (at Sakilan Mill).

ASA4 Findings: During this assessment the water quality test shows all parameter within the standard.

OBS2 (4.5.3): Care should be taken on rat baiting for area near housing (in Sakilan Estate). Careful monitoring and correct justification needed for this area as it may pose hazard to the people. Based record review, monitoring of rat attack on 97G and 97H on February 2013, rat attack was below threshold.

ASA4 Findings: The management has reviewed the rat baiting records and rectified the issue. The rat baiting at palms adjacent to the housing has been stopped to avoid hazards. The threshold level is monitored by the assistant before baiting is conducted.

OBS3 (4.5.4): Management of Linbar 2 Estate could consistently calculate the a.i. used for Metsulfuron methyl and Glyphosate application in 2012/2013, as in 2011/2012.

ASA4 Findings: During the ASA4 Linbar 2 provided the calculations to show the a.i/ha which shows 0.316/ha.

OBS4 (4.7.1): Management need to ensure distribution of latest risk assessment to the workers, once it reviewed (at Linbar 2 Estate).

ASA4 Findings: The management conducted briefing to workers immediately after the ASA3 in February 2013 with records of attendance to explain the work related risk.

OBS5 (5.1.2): Environmental improvement plan for Schedule waste store in Sakilan Mill need to be reviewed to avoid any future negative impact (e.g. rain water, bird) since the current store is not covered by the proper wall.

ASA4 Findings: The mill has reviewed the Environmental improvement plan and as part of the improvement, the mill has constructed proper wall and shade to avoid any rain water contamination.

OBS6 (5.2.1): HCV assessment report will need to review (refer back to HCV Toolkit for Malaysia) and follow the HCV assessment report for RSPO certification in particular of reporting requirements.

ASA4 Findings: HCV revision was done on 4 – 11 November 2013 referring to the HCV Toolkit for Malaysia conducted by assessor attended HCV assessment training.

OBS7 (5.2.3):

- Consideration maybe taken on collecting information related to wildlife characteristic and behaviour and develops a better measure to avoid human-wildlife conflicts.
- Estate management may need to adjust the patrol schedule as per HCV management plan (weekly basis) and conducted to other HCV areas (Linbar 2 Estate).
- Management may take benefit recording wildlife activities based on report from other sources such as worker or other staff.

ASA4 Findings: In the revised HCV assessment, the assessor took consideration on collecting information related to wildlife characteristic and behaviour and develops measure to avoid human-wildlife conflicts as part of management and monitoring process. Estate management adjusted the patrolling schedule as per HCV management plan. Management also started to record wildlife activities based on report from other sources such as worker or other staff.

OBS8 (6.9.2): in Linbar 2 Estate: It has noted that the Gender committee meetings were conducted together for male and female workers. This will not serve the actual purpose of the gender committee formation which to discuss gender issues especially for women rights.

ASA4 Findings: Linbar estate is now conducting separate Gender committee meetings for female and male.

3.4 Issues Raised By Stakeholders and Findings with Respect To Each Issue

During this ASA4, the majority of stakeholders had positive comments about Sakilan Certification Unit. Issues raised by stakeholders were discussed with the management and response is recorded. Part of the information is included in the above summary report on

the relevant criteria. The details of stakeholder's comments are as below:

Head of Village: The head of village confirm that they are allowed to meet the Manager directly if there are any issues. Job opportunity for local community is given priority. There are communities working in the plantation. Management also assist in maintaining the road leading to the plantation through a road committee. No land disputes or any other issues that need action at the moment.

Company response: Management always keep good communication with village community through the social liaison officer.

Auditor finding: Positive comments. No pending issues.

School Headmaster: He confirms that the management always help the school through donation for school activities. Management also assist in maintaining the road leading to the school. As far as he aware of there is no land disputes or any other issues that need action at the moment.

Company response: Management always assist the school whenever request is received.

Auditor finding: Positive comments. No pending issues.

Contractor: Interviewed with contractor and revealed that the management established transparent communication with the contractor related to work condition, payment, work instruction etc. All contracts reviewed semi-annually and will only be engaged if their performance is good. No dispute throughout the past years. Trainings are given by the estate before contractor start working and estate always stress out the safety issue while working in their area. Contractor is fully aware of company's policies such as health & safety policy, environmental policy etc.

Company response: Management always enforce safety and health among contractors.

Auditor finding: Positive comments. No pending issues.

Village Representative: Positive comments received from the local community representative and revealed few of his relatives are working in the estate. They are well paid and satisfied with the management. Good relationship has been established with the estate and no barriers to seek for estate's help when needed such as donation during festival, water and electricity etc. No land disputes.

Company response: Management keep the good relationship and assist wherever possible.

Auditor finding: No pending issues.

Union and workers Representative: Positive comments received from the union and workers representative. No complaints or negative feedback received. Pay is prompt and follows the minimum wage. Happy with the facilities provided.

Company response: Management always keep communicating with workers union and workers representatives to ensure issues are identified and addressed immediately.

Auditor finding: No pending issues.

Government Departments: Phone call interview made. No comments was given due to the representatives are attending meeting.

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Date of Re-Certification Visit

The re-certification visit will be scheduled not later than twelve months of the ASA4 date.

4.2 Date of Closing Nonconformities (Major and Minor)

CAR Ref.	CLASS	ISSUED	STATUS
AT01 2.1.2	Major	IAV 28/11/2008	Closed on 16/12/2008
AT02 5.3.1	Major	IAV 28/11/2008	Closed on 16/12/2008
AT03 4.1.2	Minor	IAV 28/11/2008	Closed on 16/12/2008
AT04 4.4.7	Minor	IAV 28/11/2008	Closed on 16/12/2008
AT05 5.3.2	Minor	IAV 28/11/2008	Closed on 16/12/2008
AT06 5.5.3	Minor	IAV 28/11/2008	Closed on 16/12/2008
AT07 6.2.3	Minor	IAV 28/11/2008	Closed on 16/12/2008
AT08 6.5.3	Minor	IAV 28/11/2008	Closed on 16/12/2008
CR01 2.1.1	Major	ASA1 28/01/2011	Closed on 27/03/2011
CR02 4.7.1	Major	ASA1 28/01/2011	Closed on 27/03/2011
A535834/1 5.1.2	Minor	ASA1 28/01/2011	Closed on 17/02/2012
A535834/2 5.3.2	Minor	ASA1 28/01/2011	Closed on 17/02/2012
A535834/3 6.1.3	Minor	ASA1 28/01/2011	Closed on 17/02/2012
A535834/4 7.1.2	Minor	ASA1 28/01/2011	Closed on 17/02/2012
A704230/7 5.6.2	Minor	ASA2 17/02/2012	closed on 27/02/2013
A848092/1 (465161-2M) 5.2.2	Major	ASA3 27/02/2013	Closed on 17/04/2013
A848092/2 (465161-3M) D.3.4; D.4.1	Major	ASA3 27/02/2013	Closed on 17/04/2013
A848092/1 (465161-1) 2.1.3	Minor	ASA3 27/02/2013	Closed on 17/12/2014
1007386M0 4.4.1	Major	ASA4 18/12/2013	Closed 17/02/2014

4.3 Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

Please sign below to acknowledge receipt of the assessment visit described in this report and confirm the acceptance of the assessment report contents including assessment findings.

Signed for on behalf of
IOI Corporation Bhd – Sakilan



Too Heng Liew
Head of Sustainability
Date: 10/4/2014

Signed for on behalf of
BSi Group Singapore Pte Ltd



.....
Senniah Appalasamy
BSi RSPO Lead Auditor
Date: 5/04/2014

Appendix A: Supply Chain Certification Audits

Supply Chain Report Details

Standard: Supply Chain Certification requirement for CPO Mills – Module D Segregation

Location: Sakilan Palm Oil Mill

Date: 17/12/2013

Etrace transaction was made from 02/06/2013 – 27/09/2013 period for the total amount of 21,775mt. This was checked through eTrace system with total transactions made during the above period.

No transaction made through the Green Palm for the above period.

D.1. Documented procedures

D.1.1 The facility shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:

a) Complete and up to date procedures covering the implementation of all the elements in these requirements.

Complies – Procedure is current and includes all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products. The current procedure is RSPO Supply Chain Module D – CPO Mills: Segregation dated 15 September 2012 (ref: RSPOSC/SOP/SG/3)

b) The name 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 facilities procedures for the implementation of this standard.

Complies – similar to previous ASA3, the Mill Manager maintains the responsibility for the Supply Chain aspects of FFB receipts, processing and shipping of palm products. Interview with staff involve in the SCCS documentation confirmed their knowledge of the RSPO Supply Chain requirements.

D.1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFB.

Complies - Procedure of RSPO Supply Chain Module D – CPO Mills: Segregation dated 15 September 2012 (ref: RSPOSC/SOP/SG/3) covers receiving of FFB from certified supply base, processing and storage, and recording the dispatch of certified oil and palm kernel. There is no non-certified FFB received. Certified FFB from Syarimo sent to Sakilan mill whenever there is overcapacity at Syarimo mill. The Syarimo FFB delivered is complied with the requirements of RSPO supply chain. This was checked and verified during the supply chain audit at Sakilan Mill. Syarimo's RSPO certificate number and validity is already included in the summary report. [Syarimo (RSPO Cert. №: RSPO 928388 Exp. Date: 19/3/2018)]

D.2. Purchasing and goods in

D.2.1 The facility shall verify and document the volumes of certified and non-certified FFBs received.

Complies – System in place at the Mill to verify and record the volume/ tonnages of certified FFB received at the weighbridge and these are reported daily to Head Office. Sakilan Palm Oil Mill receives only certified FFB from own supply base and IOI group estate certified [Syarimo (RSPO Cert. №: RSPO 928388 Exp. Date: 19/3/2018)]

D.2.2 The facility shall inform the CB immediately if there is a projected overproduction.

Complies – the company has a mechanism for advising the CB of production variations, which are monitored internally.

D.3. Record keeping

D.3.1 The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these requirements.

Complies – Inspection of records at the Mill confirmed these were updated daily. For example: Daily report dated 17/12/2013.

D.3.2 Retention times for all records and reports shall be at least five (5) years.

Complies – Records are archived and stored for 5 years as per SOP as mentioned in indicator D.1.1

D.3.3 The facility shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO, PKO and palm kernel meal on a three-monthly basis.

Complies – The palm oil mill records and keep track of balance certified FFB; CPO and PK delivered and balance are updated every quarterly and reported to Head Office in a excel sheet.

D.3.4 The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/SG or Segregation. The supply chain model used should be clearly indicated.

Complies - The current procedure on stamping of supply chain model in documents related to sales and purchase contract implemented. Sample records were reviewed, and found there is a stamp of CSPO SG in weight bridge ticket and Delivery Order. Sample checked dated 17/12/2013, number 200477.

D.4. Sales and good out

D.4.1 The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information:

a) The name and address of the buyer; Complies – IOI Edible Oil Sdn Bhd..

b) The date on which the invoice was issued; Complies – Dated 17/12/2013.

c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance) – Complies – stamped as CSPO/SG.

d) The quantity of the products delivered; Complies – 35.22mt.

e) Reference to related transport documentation - Complies - By tanker number SAA9561N.

Note: The previous NC (ref. No. A848092/2: (D.3.4; D.4.1) was closed on 17 April 2013.

D.5. Processing

D.5.1 The facility shall assure and verify through clear procedures and record keeping that the RSPO certified palm oil is kept segregated from non certified material including during transport and storage and be able to demonstrate that it has taken all reasonable measures to ensure that contamination is avoided. The objective is for 100 % segregated material to be reached. The systems should guarantee the minimum standard of 95 % segregated physical material; up to 5 % contamination is allowed.

Complies – The company has owned mechanism on the processing facility in term of working instruction and procedure. Review and site visit confirms all mechanisms are available in the mill. Personnel involve implementation of SCCS are aware.

D.5.2 The facility shall provide documented proof that the RSPO certified palm oil can be traced back to only certified segregated material.

Complies – Sakilan Palm Oil Mill have documented proof of documents and records which shows the RSPO certified palm oil can be traced back to only certified segregated materials. Records and documents include Daily Weighbridge Report, Daily Processing Records, Daily Storage Records, Daily Despatch Records and Monthly Progress Report. The content of these documents showed FFB receipt and processed, CPO and PK produced and despatched.

D.5.3 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that: The crush operator conforms to these requirements for segregation; The crush is covered through a signed and enforceable agreement.

Not Applicable – There is no palm kernel crushing plant at the mill. The palm kernel is sold to several palm kernel crushing plants through local sales.

D.6. Training

D.6.1 The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems.

Complies – The company maintains records of training similar as previous ASA3. Refreshment training was conducted on 2nd March 2013. During the training, all relevant personnel were reminded to follow the SOP. Any proposed changes should be discussed with SOP Department of IOI. Weighbridge clerks were also reminded that they are to notify the management immediately if any irregularities are noticed. Latest training was on 6 November 2013.

D.7. Claims

D.7.1 The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims.

Complies – As of the Assessor's knowledge, the company has not made claims outside of the RSPO rules for Communications and claim.

Actual Certified Palm Production – Financial Year January – December 2013

MILL	CAPACITY	CPO	PK
Sakilan Palm Oil Mill	40 mt/hr	27,312	7,271

Actual Sales of Certified Palm Products – Financial Year January - December 2013

MILL	Certified CPO Sales (mt)	Certified PK Sales (mt)	Remarks
Sakilan Palm Oil Mill	21,775	2,484	Sales are to IOI Group Refinery IOI Edible Oil Sdn Bhd

Actual Certified FFB Received Monthly – Financial Year January - December 2013

Month	Sakilan Estate	Linbar 1 Estate	Linbar 2 Estate	Syarimo Group*	Total FFB/Month
January 2013	4,677	2,616	3,508	-	10,801
February 2013	4,097	1,185	2,981	-	8,263
March 2013	4,346	2,723	2,565	-	9,634
April 2013	4,578	2,757	3,627	-	10,962
May 2013	4,882	2,677	3,821	-	11,380
June 2013	4,992	2,876	2,987	-	10,855
July 2013	4,426	1,697	3,271	-	9,394
August 2013	4,070	1,697	3,631	-	9,398
September 2013	4,435	2,198	3,727	-	10,360
October 2013	3,834	2,083	4,012	-	9,929
November 2013	5,613	2,387	4,102	4,320	16,422
December 2013	5,007	2,493	4,386	-	11,886
Total	54,957	27,389	42,618	4,320	129,284

* IOI group estate - RSPO certified [Syarimo (RSPO Cert. No: RSPO 928388 Exp. Date: 19/3/2018)]

Appendix B: Sakilan Certification Unit's RSPO Certificate Details

IOI Corporation Berhad
 Sakilan Palm Oil Mill
 Sandakan Regional Office
 Mile 45 Sandakan / Telupid, wdt 164
 Sandakan, 90009
 Malaysia
www.ioigroup.com

Certificate Number: **SPO 543161**
 Date of Certification: 8 March 2010
 Expiry Date: 7 March 2015

Applicable Standards: RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance; RSPO P&C MY-NIWG 2010; and RSPO Supply Chain requirements for CPO Mill Module D – Segregation; November 2011.

Sakilan Palm Oil Mill and Supply Base		
Location	Sandakan, Sabah, Malaysia.	
Address	West of Sandakan, Sabah, Malaysia, Mile 45 Sandakan / Telupid, wdt 164 Sandakan, 90009, Malaysia.	
GPS Location	117° 50' 37" E ; 5° 50' 21" N	
CPO Tonnage Total (Certified)	28,000	
PK Tonnage Total (Certified)	7,300	
Own estates FFB Tonnage (Certified)	142,400	
Supply Base Estates (Certified)	Sakilan Estate	66,400
	Linbar 1 Estate	28,500
	Linbar 2 Estate	47,500

Appendix C: ASA4 Assessment Programme

Date	Time	Subjects	Senniah	Nabila	Muhd Haris
Monday 16/12/2013	AM	Team travelling from KL to Sandakan Pick up by IOI Sakilan	√	√	√
Tuesday 17/12/2013 Sakilan Palm Oil Mill	08.00 – 09.00	Opening Meeting:: <ul style="list-style-type: none"> • Presentation by the Estate and mill, Supply Chain related to the FFB supplied to the mill, progress of previous NCs and time bound plan. • Presentation by Audit Team Leader and confirmation on the assessment scope • Finalize Audit schedule (including stakeholders consultation) 	√	√	√
	09.00 – 12.00	Mill inspection, FFB receiving, warehouse, workshop, wastes management, Effluent Ponds, OSH, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 17.00	Document Audit, SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, permits, mill inspection records, etc.	√	√	√
Wednesday 18/12/2013 Linbar 1 Estate	08.00 – 12.00	Field visit, boundary inspection, fertiliser application, field spraying, harvesting, workers interview, buffer zone, HCV area, Office, workshop, worker housing, clinic, Landfill, Chemical store and mixing, etc.	√	-	√
	09.00 – 12.00	Meeting with stakeholders (government, village representative, smallholder, union leader, contractor etc).	-	√	-
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 17.00	Document review (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, Time bound plan verification, review pay documents etc).	√	√	√
	Evening	Auditor meeting	√	√	√
Thursday 19/12/2013 Sakilan Estate	08.00 – 12.00	Field visit, boundary inspection, fertiliser application, field spraying, harvesting, workers interview, buffer zone, HCV area, Office, workshop, worker housing, clinic, Landfill, Chemical store, mixing.	√	√	-
	0800 – 12.00	Short visit to Linbar 1 estate to verify the restoration of the riparian and action taken.	-	-	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 17.00	Document review (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, Time bound plan verification, review pay documents etc).	√	√	√
	Evening	Auditor meeting	√	√	√
Friday 20/12/2013	AM	Closing Meeting	√	√	√

Appendix D: List of Stakeholder Contacted

INTERNAL STAKEHOLDERS

<i>Sakilan Mill</i>	<i>Sakilan Estate</i>	<i>Linbar 1 Estate</i>
Mill manager and staffs Boiler-man Engine driver Store Clerk Workshop foreman Clinic/hospital assistants Gender Committee Representatives General Clerk Gardener ETP Operator Process Staff FFB Grader Mill Supervisor	Estate manager and staffs Field supervisor/mandor Spraying operator Fertilizer applicators Store clerk Workshop staff	Estate manager and staffs Field supervisor/mandor Workshop Foreman Store Clerk Sprayer Manuring operators Hospital Assistant

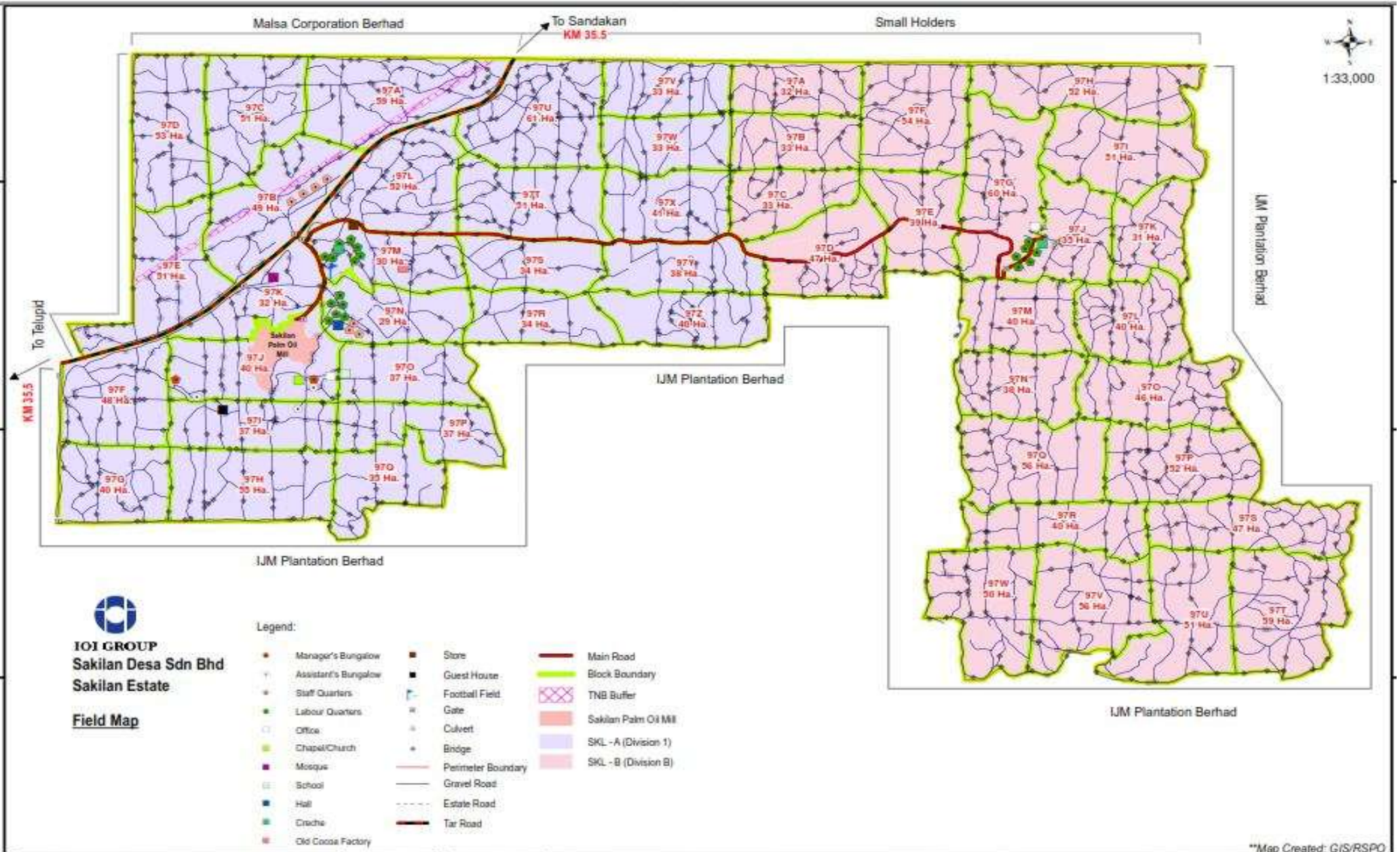
EXTERNAL STAKEHOLDERS

<i>GOVERNMENT DEPARTMENTS</i>	<i>NGOs and others</i>	<i>Local Communities</i>
Department of Environment Forestry Department	Workers UNION Leader FFB Contractor J.S. Enterprise Tractor Parts Supplier Palm Mach Sdn Bhd Representative LH Parts Supplier	Sakilan Desa School Head Master Kampung Lung Manis Village Head Kampung Pahu Village Representative

Appendix E: IOI Group Time Bound Plan

No	Certification Unit	Status	Remarks
1	Pamol Sabah Palm Oil Mill (Covering 6 Estates)	Certified since 1/2/2009.	Re-Certification on 21/1/2014
2	Sakilan Palm Oil Mill (Covering 3 Estates)	Certified since 8/3/2010	-
3	Pamol Kluang Palm Oil Mill (Covering 6 Estates)	Certified since 16/3/2010	-
4	Gomali Palm Oil Mill (Covering 11 Estates)	Certified since 23/8/2010	-
5	Baturong Palm Oil Mill (Covering 4 Estates)	Certified since 8/10/2010	-
6	Bukit Leelau Palm Oil Mill (Covering 6 Estates)	Certified since 19/11/2010	-
7	Mayvin Palm Oil Mill (Covering 5 Estates)	Certified since 22/12/2010	-
8	Pukin Palm Oil Mill (Covering 4 Estates)	Certified since 13/6/2012	-
9	Syarimo Palm Oil Mill (Covering 9 Estates)	Certified since 20/3/2013	-
10	Ladang Sabah Palm Oil Mill (Covering 8 Estates)	Certified since 3/4/2013	-
11	Leepang Palm Oil Mill (Covering 7 Estates)	Certified since 16/12/13	-
12	Morisem Palm Oil Mill (Covering 9 Estates)	Certified since 18/12/2013	-
13	IOI-Pelita RSPO Main Audit (covering 2 estates – No Palm Oil Mill)	<i>*Audit date is depending on uplifting on suspension</i>	-
14	PT SKS & PT BNS (No Palm Oil Mill)	<i>*Audit date is depending on uplifting on suspension</i>	-
15	Unico – Desa (New Acquisition in 2013) – 2 Palm Oil Mills	Certification by 2016	New Acquisition in 2013

Appendix F: Sakilan Estate field map and surrounding entity.



Appendix G: Linbar 1 Estate field map and surrounding entity.

