

**RSPO – 1st Annual Surveillance Assessment (ASA1-1)
Public Summary Report**

<p>Company Name</p> <p>IOI Corporation Bhd. Pamol Plantations Sdn Bhd</p>
<p>Certification Unit:</p> <p>Pamol Kluang Palm Oil Mill Jalan Kluang – Mersing, Kluang, Johor, Malaysia</p>

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Section 1 Scope of the Certification Assessment

1.Company Details			
RSPO Membership Number	2-0002-04-000-00	Date	Member since: 17 May 2004
Company Name	IOI Corporation Berhad		
Address	Two IOI Square, IOI Resort, 62502 Putrajaya, Malaysia		
Mill Address	Pamol Kluang Palm Oil Mill, P.O. Box 1, 86007 Kluang, Johor, Malaysia.		
Subsidiary of (if applicable)	Pamol Plantations Sdn. Bhd,		
Contact Name	Yeo Lee Nya		
Website	www.ioigroup.com	E-mail	yeo.leenya@ioigroup.com
Telephone	03-89478888	Facsimile	03-89432266

2.RSPO Certification Information			
Certificate Number	RSPO 547027	Initial Certificate Date	16 March 2010
		Expiry Date	15 March 2020
Scope of Certification	Mill: Pamol Kluang Palm Oil Mill Supply Base: Pamol Barat Estate, Pamol Timur Estate, Mamor Estate, Unijaya Estate, Kahang Estate and Swee Lam Estate.		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
NIL	-	-	-

3.Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Pamol Kluang Palm Oil Mill	Jalan Kluang – Mersing, 86007 Kluang, Johor, Malaysia.	103° 23' 32.25"	2° 06' 39.49"
Pamol Timur Estate	Jalan Kluang – Mersing, 86007 Kluang, Johor, Malaysia.	103° 24' 06.18"	2° 07' 53.21"

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Pamol Barat Estate	Jalan Kluang – Mersing, 86007 Kluang, Johor, Malaysia.	103° 20' 44.17"	2° 06' 44.49"
Mamor Estate	Jalan Paloh, 86007 Kluang, Johro, Malaysia.	103° 18' 58.93"	2° 09' 51.73"
Unijaya Estate	Jalan Kluang – Ayer Hitam, 86007 Kluang, Johor, Malaysia.	103° 17' 07.90"	1° 55' 36.73"
Kahang Estate	Jalan Kluang – Mersing, 86007 Kluang, Johor, Malaysia.	103° 29' 51.83"	2° 19' 55.73"
Swee Lam Estate	Jalan Kulai, Kulai, Johor, Malaysia.	103° 39' 36.25"	1° 40' 55.94"

4. Description of Certified Supply Base

Estate	Mature (ha)	Immature (ha)	Total Planted Area (ha)	Infrastructure & Other (ha)	Total Hectareage	% of Planted
Pamol Timur Estate	1,346.00	765.00	2,111.00	185.59	2,296.59	91.92
Pamol Barat Estate	1,658.00	506.00	2,164.00	158.30	2,322.30	93.18
Mamor Estate	2,074.00	0.00	2,074.00	156.00	2,230.00	93.00
Unijaya Estate	1,027.00	150.00	1,177.00	83.64	1,260.64	93.41
Kahang Estate	2,278.00	0.00	2,278.00	142.00	2,420.00	94.13
Swee Lam Estate	938.00	326.00	1,264.00	102.85	1,366.85	92.48
Total	9,321.00	1,747.00	11,068.00	828.38	11,896.38	93.04

Note: Reduction of total area and changes in Unijaya Estate area due to error in calculation where 1177 (Total planted area) + 83.64 (Total Infrastructure and others) supposed to be 1260.64 and not 1260.00.

5. Plantings & Cycle

Estate	Age (Years) & Ha.					Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimate d (Jan – Dec 2015)	Actual (Dec 14 – Nov 15)	Forecast (Dec 15 – Nov 16)
Pamol Timur Estate	872	535	568	197	0	29,310	28,831.94	26,300.00
Pamol Barat Estate	699	203	0	1,292	0	28,869	33,892.73	30,678.00
Mamor Estate	0	95	1,480	540	0	64,912	53,902.02	30,450.00
Unijaya Estate	166	278	272	478	0	22,810	23,551.80	21,643.00
Kahang Estate	0	377	1,911	0	0	63,812	57,115.76	69,370.00
Swee Lam Estate	326	210	475	412	29	30,830	26,303.84	25,400.00
Total	2,063	1,698	4,706	2,919	29	240,543	223,598.09	203,841.00

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6.Certified Tonnage									
Mill	Estimated (Previous Year Jan 2015 – Dec 2015)			Actual (This Year Dec 14 – Nov 15)			Forecast (Next Year Dec 15 – Nov 16)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Pamol Kluang Palm Oil Mill Capacity: 60mt/Hour	240,543	56,528	13,230	223,598.09			203,841	49,162	10,242
Other certified estates (refer section D.4.1 of Appendix F for details)	-	-	-	417.60	52,381	11,386	1,000		
Total	240,543	56,528	13,230	224,015.69	52,381	11,386	204,841	49,162	10,242

Section 2 Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
 (ASI Accreditation Number: RSPO-ACC-19)
 BSI Services Malaysia,
 Unit 10-03, Level 10, Tower A, The Vertical Business Suites,
 Bangsar South, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur
 Senniah Appalamy: Senniah.Appalamy@bsigroup.com
www.bsigroup.com

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 is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 14 - 18 December 2015. The audit programme is included as Appendix C. The approach to the audit was to treat the mill and its supply bases as a RSPO Certification Unit. Mill was audited together with the sampled estates (Pamol Timur and Unijaya). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families, review of documentation and monitoring data. RSPO P&C MYNI-2014 was used as checklists and questionnaires were used to guide the collection of information. The comments made by external stakeholders were also taken into account in the assessment.

Structured worker interviews with male and female workers and staff were ...making excellence a habit.™

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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.

The nonconformities that were assigned during the recertification audit (RAV) which was closed during the last assessment were followed up to ensure it is remaining closed. Previous nonconformities are remains closed. The assessment findings are detailed in Section 3.3.

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

This report was internally reviewed by Certification Reviewer prior to certification decision by BSI.

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

1.Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Pamol Kluang Palm Oil Mill	√	√	√	√	√
Pamol Timur Estate		√			√
Pamol Barat Estate	√			√	
Mamor Estate			√		
Unijaya Estate		√			√
Kahang Estate			√		
Swee Lam Estate	√			√	

Tentative Date of Next Visit: December 2016

Total No. of Mandays: 9 man-days on-site

BSI Assessment Team:

Hafriazhar Mohd Mokhtar – Lead Assessor

Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C ...making excellence a habit.™

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Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

Mohamed Hidhir – Team member

He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices and supply chain, safety and health, environmental and workers and stakeholders consultation.

Kelvin Lim – Team member

Kelvin Lim Kok Wei is a fulltime employee with BSI Services Malaysia. He graduated from University Tunku Abdul Rahman, Malaysia. He attended internal RSPO training in May 2014. He has completed ISO 9001:2008 Quality Management System Lead Auditor training in February 2014 and MSPO training on 14 March 2014. Currently he is an ISO 9001:2008 and Medical Device auditor with BSI. He has involved in MSPO audits since May 2014 covering legal and social aspects. Recently he is involved as Social Auditor during the RSPO Assessment to assess the social aspects and legal issues. During this assessment, he assessed on the legal aspects, Social and community engagements, Stakeholders consultation, and workers welfare.

Accompanying Persons: Not Applicable

Section 3 Summary of Assessment Findings

3.1 Details of audit results are provided in the following Appendix:

- RSPO P&C MYNI 2014 Checklist: Appendix A
- IOI Corporation Berhad - Time Bound Plan: Appendix B
- RSPO Supply Chain Certification Checklist: Appendix F

3.2 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), Sejap and Tegai Estates (Sarawak) are processed at Mills owned by other companies. IOI Corporation Berhad has prepared latest Time Bound Plan to achieve RSPO Certified Sustainable Palm Oil for all of its Oil Mills. Time Bound Plan to certify newly acquired Unico Desa mill 1 and the second Unico Desa Mill is included along with the property in Indonesia. The changes are a positive approach by IOI to ensure all the entities included in the Time Bound Plan. Any isolated lapse, systematic failure as well as any changes in the latest TBP will be followed up during the subsequent assessments. The Sustainability Department gave an update on the on-going mediation process between IOI-Pelita and Long Teran Kanan (LTK). The detail of the chronology of the case was briefly recorded in the TBP Appendix B.

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Review of the Time Bound Plan and compliance to partial certification requirements were assessed during this assessment. BSI also received a complaint from Aidenvironment in regards to the IOI TBP in the BSI's previous assessment reports. It was commented that the TBP was not clearly described. BSI Conducted meeting with Aidenvironment's representative during RT13 to discuss the concerns from Aidenvironment and to improve the reporting. To provide better clarity document review and interview with the IOI Sustainability Manager was conducted during the RT13. As per the RSPO requirement for new acquisition under rules for partial certification, IOI is committed to certify Unico-Desa two palm oil mills by 2017. The changes made in the TBP are to include specific timeline for the property in Indonesia. 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 and complaint resolution in regards to property in Indonesia.

IOI has conducted due diligence on the present plantation operations and provided positive statement that there is no known labour dispute that are not being resolved through an agreed process, legal non compliances, land disputes (other than the LTK disputes). Recent replacement of HCV at property in Indonesia revealed through the independent verification is being placed under the compensation panel. BSI has reviewed IOI's Time Bound Plan and considers the programme to be challenging to implement as it will require settlement of issues stated above. The latest progress of the Time bound Plan is as per in Appendix B.

3.3 Details of findings

During the first annual surveillance assessment there were 1 Major Nonconformity and 2 Minor Nonconformities raised. Pamol Kluang Palm Oil Mill and Supply Base Estates have submitted Corrective Action Plan for the nonconformities. Corrective action plans with respect to the nonconformities was reviewed by the BSI audit team and accepted. The effectiveness of the corrective action will be verified during next surveillance assessment.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1279712M1	<p>Requirements: 2.1.1 Evidence of compliance with relevant legal requirements shall be available. Highly Toxic Pesticides Regulations 1996 – Regulation 4 : Maintenance of records</p>	Major
	<p>Evidence of Nonconformity: Unijaya Estate: Class IA, Methamidophos was used for bagworm treatment. It was found that form I, II & III was not available for September and October 2015 application.</p>	
	<p>Statement of Nonconformity: Evidence of compliance was not effectively implemented.</p>	
	<p>Action: Identified Root Cause of NC: 1) Though "maintenance of records" is part of the training module which was used to train the personnel handling the Highly Toxic Pesticides, it was not included in the Safe Operating Procedures 2) As this was the first time Unijaya estate was using Highly Toxic Pesticides, the contractor and staff-in-charge overlooked the requirement to maintain records</p> <p>Immediate Correction: 1) The Safe Operating Procedures (SaOP) for working with Highly Toxic Pesticides</p>	

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	<p>entitled "Prosedur Kerja Selamat Racun Makhluk Perosak Amat Berbisa" dated 01 August 2012 will be revised to include "maintenance of records" as per Pesticides (Highly Toxic Pesticides) Regulations 1996 Second Schedule.</p> <ol style="list-style-type: none"> 2) The revised SaOP will be used to train all estate personnel who handle Highly Toxic Pesticides. 3) This SaOP will also be distributed to all estates together with Schedule 2 Form I, II and III: Form I-RECORD OF WORKERS INVOLVED IN USING OR HANDLING HIGHLY TOXIC PESTICIDES; Form II-RECORD OF THE USE OF AND TOTAL HOURS WORKED WITH HIGHLY TOXIC PESTICIDES; Form III-RECORD OF HIGHLY TOXIC PESTICIDES RECEIVED 4) As it is mandatory to keep records for at least 3 years, Unijaya estate will fill up the above forms for the treatment done in September and October 2015 <p>Corrective Action to eliminate Cause of NC:</p> <ol style="list-style-type: none"> 1) An email has been sent to remind estates that use Highly Toxic Pesticides that it is mandatory to maintain records and forward a copy to the Sustainability Team. 2) Sustainability Team will audit the records during our annual audits 	
	<p>Status: The CAP was found appropriate and accepted. Evidence required has been submitted for satisfactory closure of Major NC. NC has been closed on 31/12/2015.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1279712N1	<p>Requirements: 2.1.4 A system for tracking any changes in the law shall be implemented.</p>	Minor
	<p>Evidence of Nonconformity: Legal and other requirements (LORR) dated 23/8/15 did not include the latest revision of FMA, Person In- Charge Regulations 2014 and Industrial Code Of Practice 2010.</p>	
	<p>Statement of Nonconformity: System for tracking any changes in the law was not effectively implemented.</p>	
	<p>Action: Identified Root Cause of NC: <ol style="list-style-type: none"> 1) These changes in legislation were not updated into our Legal Requirements Register as we do not have a system to automatically alert us of changes in legislation 2) Secondly, the personnel who was tasked with updating the Legal Register resigned recently Immediate Correction: The Factories and Machinery (Person In-Charge) (Amendment) Regulations 2014 and Industry Code Of Practice For Safe Working In A Confined Space 2010 will be updated into the mechanism for tracking changes in law (IOI Legal Requirements Register)</p>	

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	<p>Corrective Action to eliminate Cause of NC:</p> <p>1) Every 1st week of the month, the Sustainability Team will access the Malaysian Government Gazettes portal (e-Federal Gazette) to check whether there are any changes in legislation that are relevant to us. Relevant changes will then be updated into IOI's Legal Requirements Register and shared with operating centres.</p> <p>2) The Legal Requirements Register will be discussed in our monthly meetings</p>	
	<p>Status: Immediate correction and corrective action taken deemed necessary for the closure of NC. Evidence and effectiveness of CAP taken will be verified during next visit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1279712N2	<p>Requirements: 4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <p>Evidence of Nonconformity: Unijaya Estate:</p> <p>i) Water Management Plan for Pamol Region Report dated: 15/11/2015</p> <p>2.2.1.9: Water for Domestic Use - Domestic water quality analysis for chemical and biological contamination shall be conducted every 6 months interval to ensure the quality of water is up to the mark and in accordance with National Drinking Water Quality Standard (NDWQS).</p> <p>ii) Records of Domestic Water Discharge Quality Monitoring by Env Consultancy & Monitoring Services Sdn. Bhd. for drinking water standard and analyzed by NM Laboratory (Johor) Sdn. Bhd. dated on November 2015</p> <p>Statement of Nonconformity: Records of monitoring of domestic water quality analysis for chemical and biological contamination not available every 6 months as per water management plan.</p> <p>Action: Identified Root Cause of NC: As maintenance work was being carried out at the water treatment plant, Unijaya estate Manager told ENV Consultancy & Monitoring Services Sdn. Bhd not to carry out the water analysis in May 2015. However, he forgot to request ENV to carry out the analysis once the maintenance work was completed. The next analysis was only carried out in November 2015</p> <p>Immediate Correction: An email has been sent to all estates that carry out their own water treatment to inform them to add Domestic Water quality analysis into their yearly safety and health programs with effect from January 2016. This is to ensure that analysis is done every 6 months to determine whether the quality is in accordance with the National Drinking Water Quality Standard (NDWQS)</p> <p>Corrective Action to eliminate Cause of NC:</p>	Minor

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	<ul style="list-style-type: none"> The service providers eg Env Consultancy & Monitoring Services Sdn. Bhd and Nalco have been told to carry out domestic water quality analysis at estates that carry out their own treatment without fail every 6 months. They have been told to forward a copy of the analysis reports to the Sustainability Team and also notify us if any of the estates refuses to allow them to carry out the analysis. <p>Sustainability Team will audit the analysis records during our annual audits.</p>	
	<p>Status: Immediate correction and corrective action taken deemed necessary for the closure of NC. Evidence and effectiveness of CAP taken will be verified during next visit.</p>	

Observation	
OBS#	Description
Nil	Nil

Positive Findings	
PF #	Description
n/a	n/a

Issues raised by Stakeholders	
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Pamol Kluang Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.</p> <p>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.</p> <p>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 E.</p>	
IS #	Description
1	<p>Issues: District Workers Union Secretary: No pending disputes or any wage issues among local employees. Company follow the NUPW/MAPA agreement and minimum wage requirement for all local workers. He highlighted that foreign workers are not joining union.</p> <p>Management Responses: Management always encourage union representative and workers to meet them to resolve any issue immediately and open for discussion. The Management does no restrict the foreign worker to join the union where this was based on their will.</p> <p>Audit Team Findings: No disputes were raised by local workers and their representatives at their operation site interviewed</p>

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	<p>which indicate that the freedom to join union and procedure to voice out grievances is implanted. Interview with foreign workers reveal that the company does not restrict them to join union where only they didn't. Furthermore, they have their own representatives in the workers representative meeting (ECC).</p>
2	<p>Issues: Contractors: Contractors confirm payment is prompt as per agreed contract. Safety briefing & training has been conducted from time to time to ensure the awareness of safety when working.</p>
	<p>Management Responses: Payment is made as per the agreed terms.</p>
	<p>Audit Team Findings: No other issues.</p>
3	<p>Issues: School representatives (Headmaster & teacher from SK Pamol, SJK (T) Ldg Pamol & SRK (C) Kg Gajah): It was re-confirmed that the operating units always support school activities. The relationship is good. No other issues.</p>
	<p>Management Responses: Management assist wherever possible.</p>
	<p>Audit Team Findings: No other issues.</p>
4	<p>Issues: Chief Inspector of Kluang Prison: Chief Inspector appreciate that the estate management allowed them to collect the grass from the estate to feed the cow in the prison where it was part of the prison program training for the prisoner.</p>
	<p>Management Responses: No pending issue to be clarified with the management</p>
	<p>Audit Team Findings: No pending issue to be clarified with the management</p>
5	<p>Issues: Pengkalan Tereh Native village representative: The management has done lot of contributions to the local community. He highlighted that employment opportunity is given to nearby natives who are employed as security personnel.</p>
	<p>Management Responses: Management always give priority to the local whenever there was any job opportunity.</p>
	<p>Audit Team Findings: Positive remarks from the village representative. No any boundary disputes or complaints highlighted.</p>
6	<p>Issues: Kampung Gajah Head of Police: The management has been given full cooperation in maintaining the security and safety of the estate surrounding area through the Auxiliary Police where cooperation was always welcome whenever local police request to use the access of the estate area.</p>
	<p>Management Responses: Cooperation was always given to ensure the security and safety for the estate area.</p>
	<p>Audit Team Findings: No pending issue to be verified.</p>

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3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR No:	Description	Category (Major / Minor)
1143838N1	<p>Requirements: 5.3.3: A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>Evidence of Nonconformity: The washing area of tractor does not implement a prevention measure to control the waste water that contain traces of oil and grease from flowing into the drain.</p> <p>Statement of Nonconformity: There was no proper prevention plan for the waste water from cleaning of tractor that contains traces of oil grease that flow into the drain.</p> <p>Action / CAP Provided An oil trap has been constructed at the tractor washing area to control any spillage of contaminated washed water into the drain.</p> <p>Status: NC was verified to be remained closed during visit on 17/12/2015.</p>	Minor

Non-Conformity		
NCR No:	Description	Category (Major / Minor)
1012105N5	<p>Requirements: 6.2.3: Maintenance of a list of stakeholders, records of all communication and records of actions taken in response to input from stakeholders.</p> <p>Evidence of Nonconformity: The stakeholder list is incomplete. The external stakeholder list in Kahang Estate does not include other affected or interested parties such estate's contractors & supplier.</p> <p>Statement of Nonconformity: Stakeholder list not maintained.</p> <p>Action / CAP Provided A standard format for stakeholder name list includes all the relevant multi-stakeholders immediately developed and distributed to all operating units by the sustainability team from the Research Centre. All the estates and mill management completed the list and was checked and verified during the recertification.</p> <p>Status: The nonconformity is remains closed on 6/1/2015.</p>	Minor

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Non-Conformity		
NCR No:	Description	Category (Major / Minor)
1012105N6	<p>Requirements: 6.5.2: Labour laws, union agreements or direct contract of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) are available in the language understood by the workers or explained carefully to them by a plantation management official in the operating unit.</p> <p>Evidence of Nonconformity: At Kahang Estate, Worker's consent letters for monthly deduction for buffalo belongs to the workers (buffalo loan and buffalo insurance) are not available although the repayment is deducted. Further inspection against worker's payslip sighted deduction been carried out in the month of November and December 2013.</p> <p>Statement of Nonconformity: No consent from workers for buffalo loan deduction.</p> <p>Action / CAP Provided The agreement for buffalo loan & insurance deduction was re-distributed to buffalo owners and explained to the respective workers on 28/2/2014. Signature from the respective workers was obtained as to acknowledge their understanding and fully agree with the condition stated in the agreement for the loan deduction made. Management issue a letter to inform the Labour department regarding the deduction and apply for approval from the labour department. The letter was acknowledged by labour department.</p> <p>Status: The nonconformity remains closed during the recertification on 6/1/2015.</p>	Minor



3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
CR01	Major	20/3/2009	Closed on 16/11/2009
CR02	Major	20/3/2009	Closed on 16/11/2009
CR03	Minor	20/3/2009	Closed on 16/11/2009
CR04	Minor	20/3/2009	Closed on 16/11/2009
A542057/1	Minor	8/3/2011	Closed on 2/3/2012
A694301/1	Minor	29/2/2012	Closed on 17/1/2013
A694301/2	Minor	29/2/2012	Closed on 17/1/2013
A834990/1	Minor	17/1/2013	Closed on 11/1/2014
A834990/2	Minor	17/1/2013	Closed on 11/1/2014
A834990/3	Minor	17/1/2013	Closed on 11/1/2014
A834990/4	Minor	17/1/2013	Closed on 11/1/2014
1012105N5	Minor	11/1/2014	Closed on 6/1/2015

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1012105N6	Minor	11/1/2014	Closed on 6/1/2015
1143838M1	Major	9/1/2015	Closed on 2/4/2015
1143838M2	Major	9/1/2015	Closed on 2/4/2015
1143838M3	Major	9/1/2015	Closed on 2/4/2015
1143838N1	Minor	9/1/2015	Closed on 17/12/2015
1279712M1	Major	15/12/2015	Closed on 31/12/2015
1279712N1	Minor	15/12/2015	Open-to be verified in next audit
1279712N2	Minor	15/12/2015	Open-to be verified in next audit

Assessment Conclusion and Recommendation:	
<p>Based on the findings during the first surveillance assessment of Pamol Kluang Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C MYNI 2014 and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Pamol Kluang Palm Oil Mill Certification Unit is approved and continued.</p>	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Ms. Yeo Lee Nya	Name: Hafriazhar Bin Mohd Mokhtar
Company name: IOI Corporation Berhad	Company name: BSI Services (M) Sdn. Bhd
Title: Sustainability Manager	Title: RSPO Lead Auditor
Signature: 	Signature: 
Date: 26 Feb 2016	Date: 26/2/2016

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Appendix A: Summary Report of the Assessment

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. E.g. monthly Briefing related to ESH matter has been conducted, internal & external stakeholder meeting, ECC meeting and etc. Publicly available documents such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans & Continuous Improvement Plans and company policies are available.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	All operating units maintain records of information request and response where it was documented in the Complaint/ Grievances book, email and official letter. For example, Fish farm owner nearby Unijaya estate has requested the help of investigation of the missing fish and replied by the management on the same day. Similarly other request for information are attended promptly and confirmed by stakeholders interviewed.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>Publicly available management documents covers Land titles, OHS plans, EIA, SIA, HCV documentation, Pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and Continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator. IOI Group documents are also accessible through website link: http://www.ioigroup.com</p> <p>IOI Corporation Berhad have uploaded the status of the on-going land dispute at the plantation in Sarawak which is publicly available at website link: http://www.ioigroup.com</p> <p>RSPO Public summary reports are publicly available at each operating unit and head office on request.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Policy committing to Code of Business Conduct and Ethics as stated in the IOI Corporation Berhad’s 2014 Annual Report is communicated to all level of employees upon their employment. Currently the organization was undergoing a campaign of integrity and honesty badges where all stalls were required to wear the badges started 27/11/15.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p> <p>Pamol Kluang POM and its supply base has obtained and renewed license and permits as required by the law. Amongst the sampled licenses or permit viewed in the mill and estates were as following:</p> <ul style="list-style-type: none"> • Mill DOE License/<i>Jadual Pematuhan</i> : JPKKS 001576 (validity period 1/7/2015 - 30/6/2016) for 60MT/hr and method of POME discharge is water course (BOD limit <100ppm) and land application (BOD limit <5000ppm) • Mill river water extraction license no.: 08/A/KLG/055 (validity period until 31/12/2015) by Director of Water Resources Johor for usage quantity of 1700m³/day • Unijaya estate MPOB license: 504524202000 (validity period 1/8/2015 - 31/7/2016) • Unijaya estate schedule controlled item permit ref. no.: BPKG JH(KLU) 2176 SK; serial no.: J022347 (validity period 1/9/2015 – 30/8/2016) for storage capacity of <9,000liters diesel and <600mt fertilizer • Unijaya estate firearm license: Kelulusan KP Johor Kluang A' 1579 no. 2341161 renew date: 8/6/2015 • Unijaya estate river water extraction license no.: 08/A/KLG/055 (validity period until 31/12/2015) by Director of Water Resources Johor for usage quantity of 1700m³/day 	<p style="text-align: center;">Major Nonconformity</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Legal register covering the applicable local and international laws and regulations are available at Pamol Palm Oil Mill certification unit. Sample of permit and license sampled: Records of Unfired Pressure Vessel and Steam Boiler during mill inspection was verified. Date of inspection: 13/4/15 & 10/8/15. PMD 126 – Water tube boiler JH PMT 15410 – Steam separator JH PMT 2869 – BPR The other UPV and SB due to next inspection end December 2015.</p> <p>Competence person i) Steam engineer: 042/2015 (2nd grade)sufficient based on running heating surface. Heating surface (m2) : B2 : 1586 m2 B1: 833.3 m2 ii) Electrical charge man: A4, PJT-4-H-0207-2008 & PJT-4-B-0134-2011. Date of renewal application , 13/4/15 (MHA/SJT/0115) iii) AGT/AESP :NW-NJHR-AE-2194-M valid until 12/8/16 (AESP), AGT: NW-HQ-AGT-R-0116-N</p> <p>VE inspection by competent electrical engineer, PE-T-1-B-0005-2001. Latest inspection 29/10/15. Calibration of gas testing equipment, X-am 3000, valid until 10/9/16.</p> <p>PTE : MPOB license, 504178602000 valid until 31/5/16 Diesel, petrol and fertilizer permit, ref: BPGK JH (KLU) 2210 SK, diesel: 18,000 liter, fertilizer : 800 mt . valid until 1/7/18. Fire Arm License, renewal date 10/9/16, ref: FL534392, ammunition purchase, on 10/9/15. Permit for salary deduction and advance, refer to JTK/KG/10123 11204/01117/ bil.1/2013 (02) dated 29/3/13</p> <p>Unijaya Estate Class IA, Methamidophos was used for bagworm treatment.</p> <p>Records of monitoring (form I, II & III) was not available for September and October 2015 application. Thus, major non-conformity was issued.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p>	Complied
2.1.3	<p>A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information, MPOA and the information are communicated from the IOI Group Head Office. On the site verification, Interviews with office personnel and records indicate that the system is appropriate to the operations. Noted that the latest Industrial Code of Practice for Confined space 2010 and Person In-Charge Regulations 2014 was not updated in the legal register. Thus, minor NC was raised against the indicator	Minor Noncompliance
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.		
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Land ownership such as land title and land lease documents is available. There is no change in the land ownership. All the land belongs to IOI. PTE (freehold) : GN 000094673, lot 2589, 2125 acre. Refer to quit rent receipt dated 19/5/15. Total tile area was 2296.59 ha .	Complied
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained throughout the estate. Mill is located inside Pamol Timur Estate and sharing the estate boundary.	Complied
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI and land ownership documents verified.	Complied
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute/conflict in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI and land ownership documents verified.	Complied
2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute/conflict in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI and land ownership documents verified.	Complied
2.2.6 To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute/conflict in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI and land ownership documents verified.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).. - Major compliance -	The estate lands are legally owned and leased by IOI. The existing estates are not encumbered by any customary land rights Interview with the natives staying nearby Pamol Barat Estate reveal that the boundaries between native and plantation are very clear and transparent. No disputes highlighted.	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	The lands were acquired from private plantation companies and owners. Land title and ownership documents available to show land acquisition complied with legal requirements.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	The lands were acquired from private plantation companies and owners. Land title and ownership documents available to show land acquisition complied with legal requirements.	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	The lands were acquired from private plantation companies and owners. Land title and ownership documents available to show land acquisition complied with legal requirements.	Complied
Principle 3: Commitment to long-term economic and financial viability			

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual budget and management plan documented and with three years projection includes FFB production, CPO, OER, and KER, costs of production, CAPEX and OPEX. There is no scheme smallholder within the supply base.	Complied
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Estates have replanting programme which included in the budget as well and extended until financial year 2018/21. The replanting programme includes the schedule and hectares for each field. Review of the replanting program is conducted prior to approving the annual budget. <u>Pamol Timor Estate</u> 2016/2017: PM86 & PM 86 for total of 72 hectare. No replanting programme for 2018-2021. <u>Unijaya Estate</u> 2015/16 : PM90 A,B & C (162 ha) 19/20 : 121 ha (PM 94 A,B & C)	Complied
Principle 4: Use of appropriate best practices by growers and millers			
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.			
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	All operating units have implemented management systems for monitoring and control of best practice implementation through various SOPs for mill and estates. IOI has prepared Group Palm Oil Mill Standard Operating Procedures (SOPs) issued on April 2008 (mill) and December 2008 (estates). Another review was done on November 2014 for the Geo-tube SOP to include this SOP at the palm oil mill.	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Consistent implementation of SOPs is checked through GM visit at estate on quarterly basis to review estate performance against IOI standard with the last visit was in the months of December 2014. Record of the visit and reports are held on file "Group Plantation Director (GPD) & General Manager (GM) Visit Report". The Estate also maintained regulatory compliance visit records such as DOSH Visit Record on "Jabatan Keselamatan dan Kesihatan Pekerjaan, Johor (Department of Occupationally Health and Safety).	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.3</p> <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p>Records of monitoring and the actions taken are maintained at the mill and estates. Regular visits by GM, PC, Safety and Sustainability team were well maintained accordingly. Visit purpose varies i.e. to monitor operating unit performance as well as conducting water quality, safety and environmental monitoring based on the established management plan.</p> <p>During visit to Unijaya Estate, it was found that the water management plan was not being followed accordingly where the records of monitoring of domestic water quality analysis for chemical and biological contamination not available every 6 months as per water management plan. This was based on the records of domestic water discharge quality monitoring by Env Consultancy & Monitoring Services Sdn. Bhd. for drinking water standard analyzed by NM Laboratory (Johor) Sdn. Bhd. available only for November 2015.</p> <p>Records of monitoring and the actions taken are maintained at the mill and estates. Records verified includes Mill Advisor @ SGM audit visited the mill regularly. Visit and audits conducted in 2015:</p> <ul style="list-style-type: none"> i) Sustainability audit: 7/10/15 on the RSPO requirements as well as Safety audit by safety team (SHO, JKPP IS 127/438/2/8257) on 6/10/15. ii) Group Executive Chairman visit, dated 25/9/15 GPD visit, 4 & 5/9/15. <p><u>Pamol Timor Estate</u> BAHS: Buffalo Assisted Harvesting System De-worming and vaccination was done twice per year by appointed Vet doctor. Buffalo health records were maintained for total of 41 buffalos. Safety audit: 15/10/15 Sustainability: 8-9/10/15</p>	<p style="text-align: center;">Minor Nonconformity</p>
<p>4.1.4</p> <p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -</p>	<p>No FFB sourced from third-party. The FFB is from own company estates.</p>	<p style="text-align: center;">Not applicable</p>
<p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>		
<p>4.2.1</p> <p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -</p>	<p>Good agriculture practices from the SOP are followed to manage soil fertility to ensure optimal and sustained yield through annual fertilizer application program. Beside in- organic fertilizer, organic fertilizer in the form of POME and EFB is applied as per recommendation from IOI Research Centre. Pamol Timor Estate was visited by the agronomist on 4/11/2015.</p>	<p style="text-align: center;">Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Manuring records are maintained in the daily costing books and summarised at the end of the month. The monthly report is sent to Regional General Manager for review as part of monitoring exercise. Manuring records verified reveal that application follows recommendation Pamol Timor Estate Fertilizer recommendation, refer to RD/F-1/PTE dated 25/4/15. Straight fertilizers – SA (ammonium sulphate), rock phosphate (RP), muriate of potash (MOP), kieserite (KIE) and Borate (B). Ammonium Chloride (AC), 1 SA=0.85 AC. Records of fertilizer application. Sample for July 2015 programme: Field 11E, area covered: 63 ha, fertilizer; Compound B (NPK, Mg, B) : 2.25 kg per palm. Completed on 30/10/15 (437 bags)	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Leaf sampling carried out annually to determine the changes in the nutrient level in the palm by analysing the leaf tissue. soil analysis carried out on 5 years cycle to determine the nutrient levels in the soil. The analysis result is used for the fertilizer recommendations to ensure long term soil fertility and nutrient efficiency. Pamol Timor Estate Leaf sampling, nutrient check on : N(2.92), Mg (0.370, B (27) – high, P (0.157), K (0.98) moderate low and normal. K, 65.38% below normal level. Soil sampling taken on April 2014, 6 fields comprising of 11.72% of the total area. Results were found normal and balance.	Complied
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	Pamol Kluang Palm Oil Mill continues to utilise the Geotube to filter the solid from the POME and the solid later used by the estates as organic fertilizer. EFB application carried out along the inter-row at mature area at rate of 35-40mt/ha. Immature palms are mulched with EFB surrounding the palm circle to suppress noxious weeds. POME land application is carried out at Pamol Timur Estate was visited and verified.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	There was no fragile soil on the estates visited. Soil map and field visit further reveal that there is no fragile soil.	Complied
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Planting on terraces is carried out on slopes below 15° as part of management strategy for slope planting.	Complied

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4.3.3 A road maintenance programme shall be in place. - Minor compliance -	Road maintenance programme available at all the estates covers road grading, patching, surfacing, culvert and bridge maintenance. Road maintenance programme for 2015 is available. <u>Pamol Timor Estate</u> Road maintenance programme (resurfacing, patching and grading) including roadside and drainage and has been Completed on November 2015 at field PM87, PM99 and PM01.	Complied
4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	No peat soil. Estates and mill have water management program for the purpose of water conservation. Estates have ground cover management to ensure ground cover is maintained with soft grass. Immature area planted with cover crop.	Complied
4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No peat soil.	Complied
4.3.6 A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	No fragile and problematic soil in the estates.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.		
4.4.1 An implemented water management plan shall be in place. - Minor compliance -	Sustainability department has developed the water management plan for the whole Pamol Kluang complex. The plan has been reviewed on 15/11/2015. Water management plan includes river water monitoring. Research Centre carried out water analysis in the river (upstream, midstream, and downstream) with the last sampling was on 20/11/2015. The results shown all parameters are complied. Establishment of water management plan was done regionally by the sustainability unit of IOI with respective operating units' managers. A report on Water Management Plan for Pamol Kluang Region sighted available that have identified the physical system for water management plan for both mill and estates such as waster abstraction and treatment and nursery watering. Pamol Timur & Unijaya Estate Water management plan 2/9/2015: - rainfall 2014 = 1891.3mm/1520.2mm - rainfall 2015 = 1585mm/924 mm to date as at 30/11/2015	Complied

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Criterion / Indicator	Assessment Findings	Compliance
4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	Riparian buffer zone maintained at both sides of Streams running through the estate. At Pamol Timur and Unijaya estates the buffer zones are found well maintained. Sampled Pamol Timur Estate river water monitoring: • Annual monitoring of two natural streams was conducted by the estate. Latest sampling done on 11/6/2015, Water Quality Monitoring Report SUST-WQI/sa-019/2015 dated 29/7/2015. Report shown that water samples from all points were within allowable limit of Standard A/B of INWQS accordingly. Sampled Unijaya Estate river water monitoring: Annual monitoring of two natural streams was conducted by the estate. Latest sampling done on 10/7/2015, Water Quality Monitoring Report SUST-WQI/sa-022/2015 dated 28/8/2015. Report shown that water samples from all points were within allowable limit of Standard A/B of INWQS accordingly.	Complied
4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Effluent monitoring records: Monthly Analysis of Effluent Samples report ref. PKPOM/14/11/2015 dated 14/11/2015 by environmental consultant; parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Samples were taken from each point of treatment in the system consist of raw pond, acid ponds, digester tanks and final pond before field application. BOD limit for land application <5000mg/L were met as well as all parameters that were within allowable limit. Annual monitoring of natural stream (Sungai Sembrong) was also conducted by the mill. Latest sampling done on 25/6/2015, Water Quality Monitoring Report SUST-WQI/sa-023/2015 dated 17/11/2015. Report shown that water samples from all points were within allowable limit of Class III/IV of INWQS accordingly.	Complied
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Pamol Kluang mill monitored the water consumption on monthly basis for both its source of water supply from Syarikat Air Johor (SAJ) (drinking) and raw water (boiler & process). Total water consumed for the period from July to October 2015 was 1.24m ³ /mt FFB processed.	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.		

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Criterion / Indicator		Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	Beneficial plants are continuously being planted at the ratio of 1dm per ha. Planting of beneficial plants such as Turnera subulata, Cassia cobanensis, and Antigonon leptopus, are a continuous practice in the estates visited. Barn owl is monitored through census (form ER 9.4b) to evaluate the occupancy rate. Average occupancy rate for the month of November 2015 was 90% at Pamol Timur estate. Owl is used as a biological control to reduce rat population in the estate. Areas planted were verified during the field visit. Current status on IPM implementation: <u>Pamol Timor Estate</u> i) Barn owl box fixing, current ration 1:15. ii) Beneficial Plant Programme (cultivation) Tunera and antigonan : Example Jan 16, field 15C, 31 ha & 10M.	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	IPM training includes workers involved in rat baiting, barn owl census and those involve in the operation of nursery at Pamol Timor Estate. Training mostly from the R&D personnel and executives with plantation working experience. Last training on barn owl census and beneficial plant was conducted on 2 December 2015 by Assistant Manager.	Complied
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment			
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of all pesticides used is in the SOPs and covers all agrochemicals use. The justification is appropriate for the operations in the estates.	Complied
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides includes active ingredients used, LD50, area treated, amount of active ingredients applied per hectare and number of rounds applied maintained by estates. Records are updated and comply with the requirement. <u>Pamol Timor Estate</u> Ai/Ha: Todate Nov 2015 Glyphosate: 0.32 Amine: 0.04 Kenlon : 0.05 Cyper: 0.02 <u>Unijaya Estate</u> Methamidophos, (0.68 Ai/Ha) (Sept-Oct 15) Monocrotophos, 1.05 Ha (Feb – March 15)	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	All the estate's policy is to minimize the use of pesticides in accordance with IPM. No prophylactic use of pesticides noted during the field visit and records verification.	Complied
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	All estates eliminated the use of Paraquat. Alternatives agrochemicals such as Metsulfuron Methyl and Glyphosate Isopropylamine used to control weeds. During this audit there was class 1a and agrochemical usage sighted. Unijaya Estate Methamidophos permit (class IA), refer to JH/METHA(GL)15/80 for total of 724 liter. Permit dated 24/8/15 was verified. Total affected area 537 ha.	Complied
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators go through safe handling training and application of the pesticides. Inspections of the Mills and the Estates visited indicated that safe work practices were being implemented. The safety signage was installed at work stations and chemical store at the mill and estate. Workers are provided with appropriate safety equipment and protective equipments. Product MSDS are available and explained to applicators. Interview with workers reveal that they are aware of the agrochemical negative impacts and aware of precaution methods.	Complied
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	It was noted that chemical Stores in accordance with local regulation. Chemical storage area were visited during the site visit. Pesticide containers generated from the nursery site are triple rinsed and pierced to prevent misuse. There are times these empty containers used for storage of pre-mix agrochemical before transported to the application site. The remaining used chemical containers were disposed of by DOE approved empty container collectors.	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	Pesticides had been applied through justifiable census using agriculture best practices that minimize risk and impacts.	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial pesticide spraying.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	Regular training and briefing on pesticide handling carried out includes provision of appropriate information materials, safety and health information and environment. Information on pesticides are displayed next to the pesticides in the store and at notice board	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Interview with management team and employees reveal that proper disposal of waste material is understood. There is no any issue of burning of waste materials. Waste recycling awareness in carried out by the operating units.	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<u>Pamol Timor Estate</u> Annual medical surveillance carried out for all pesticide operators as per CHRA recommendation. Medical surveillance was done for total of 36 workers total of 8 workers on 12/3/15 and 25/11/15 by OHD, HQ/08/DOC/00/597. All workers sent for health check are fit to work. <u>Unijaya Estate :</u> Medical surveillance was done for 6 sprayers on 1/5/15 by OHD, HQ/08/DOC/00/597 and found to be fit to work.	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Field inspections, records and interviews with internal and external reveal that no pregnant or breast-feeding woman had been offered work as pesticide operator. Pesticide operators are male.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

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<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>All the operating units has maintained an approved Health and Safety Policy dated since 11 July 2011 signed by Group Plantation Director that is displayed prominently on notice boards in English and Bahasa Malaysia and approved by the IOI top management. The health and safety plan monitored by the Safety & Health (SH) Manager from the head office. The safety and health plan cover all the relevant activities in the mill and estate. The activities are recorded and implemented and monitored by the SH Manager.</p> <p>Documented Safety Management plan dated 6/10/15 was evident. Revised on annual basis, validity Dec 14-Dec 19 for 5 years.</p> <p><u>Contractor Management</u> PTW implementation for hot work, Confined Space-sampled PTW dated 31/3/15, Mechmar Towler steam drum dismantling pipe. Issuance, cancellation and gas testing result done by competent person. Health declaration was available for the said task.</p> <p><u>LEV examination, inspection</u> Carried out on 15/1/16 by IHT II, JKKP HIE 127/171-3/2. Above recommended value of ACGIH, face velocity: 0.4-0.5 m/s for gas. Duct velocity : 5-10 m/s</p> <p><u>Personal and Area Chemical Exposure Monitoring (PCEM)</u> Area and personal CEM was carried out on February 2015. Area: TWA8, PEL 176 mg/m3, result ND <0.206. Personal: TWA8, PEL 176 mg/m3, result ND <0.209.</p> <p><u>Audiometric Testing</u> Last audiometric testing was done on 28/11/14 by Specialist Mobile Audiometry Services Sdn Bhd. For 2015, the audiometric testing was conducted on 24/11/15. Full report is still pending and the results will be verified in the next audit.</p> <p><u>Medical Surveillance Programme</u> As per CHRA recommendation dated March 2014 by JKKP HIE 127/171-2 (316) medical surveillance programme has been carried out for those exposed to N-hexane, potassium chromate and welding fumes. Total of 41 workers send for annual check-up. The latest medical surveillance was carried out on 16/12/15 by registered OHD, (HQ/08/DOC/00(468) under Poliklinik Intan. From the results, all workers sent for medical surveillance are fit to work with no detrimental of heath based on USECHH3 & 4.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>Reviewed and updated of the health and safety risk assessments is carried out annually through HIRARC assessment assisted by the SH Manager. Latest review was conducted as per below:</p> <p><u>Pamol Palm Oil Mill</u> Latest accident: 27/11/15, temporary disability (16 days MC). HIRARC was updated after the accident.</p> <p><u>Pamol Timor Estate</u> 30 days LTI, dated 23/5/15, refer to orthopedics, back pain. HIRARC revised, dated 8/6/15 after the accident</p> <p>CHRA dated March 2014 by registered assessor, JKPP HIE 127/171-2 (316). Recommendation Medical surveillance: Boiler, cleaner, lab, Storekeeper, WTP, Technician. LEV inspection: Lab</p> <p>CHRA dated March 2014 by registered assessor, JKPP HIE 127/171-2 (316). Recommendation Medical surveillance: manuring, pre-mixer & sprayer, rat baiting, store keeper & tractor driver.</p>	<p>Complied</p>
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>Safe working awareness training had been carried out and covers all work groups and contractors. Interview with employees and contractors reveal that all those involved had been adequately trained in safe working practices. Appropriate personal protective equipment (PPE) provided to cover all potentially hazardous operations such as pesticide application, machine operations, land preparation for replanting, harvesting, transport etc.</p>	<p>Complied</p>
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The responsible person for the safety and health issues is the Manager and Assistant Manager. The management of the mill and estates conduct quarterly OSH committee as per schedule. During the OSH meeting health, safety and welfare issues discussed and worksite inspection was carried out. Minutes of meeting sampled at visited operating unit: OSH meeting (Pamol Mill) :, #3: 23/9/15, #2: 25/6/15,#1: 26/3/15, Ad-hoc/emergency meeting – for accident on 2/11/15. Pamol Timor Estate : #1- 10/3/15, #2- 17/6/15 #3- 17/9/15</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance									
4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -	Accident and emergency procedures had been written in English and Bahasa Malaysia and briefed to staff, workers, contractors and visitors. ERP is communicated with the employees and field/mill supervisors. Interview with the employees and supervisors reveal that they understand the emergency procedures. ERP training such as firefighting training is conducted to test the emergency preparedness. The last fire evacuation was done on 5/1/15 for Pamol Palm Oil Mill. Workers trained in First Aiders were present in the mill and field operations and contact details are posted on the notice boards. First Aid Kits were available at worksites.	Complied									
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	All workers have access to free medical care at the estate clinic. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. MSIG Insurance (M) Sdn. Bhd Policy No.: DL-09428351-FW (mill) valid until 30/9/16 for 48 workers, DL-09429145-FWC (Pamol Timor estate) valid until 30/9/16 for total of 141 workers.	Complied									
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Occupational injuries are recorded in Form JKPP 6 and JKPP 8. <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Year</th> <th>Pamol Mill</th> <th>Pamol Timor Estate</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>31 (79 LTA)</td> <td>21 (51 LTA)</td> </tr> <tr> <td>2015</td> <td>4 (83 LTA)</td> <td>17 (94 LTA)</td> </tr> </tbody> </table>	Year	Pamol Mill	Pamol Timor Estate	2014	31 (79 LTA)	21 (51 LTA)	2015	4 (83 LTA)	17 (94 LTA)	Complied
Year	Pamol Mill	Pamol Timor Estate										
2014	31 (79 LTA)	21 (51 LTA)										
2015	4 (83 LTA)	17 (94 LTA)										
Criterion 4.8:												
All staff, workers, smallholders and contract workers are appropriately trained.												
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	Formal training program for the year 2016 was prepared in December 2015 for the new financial year. The training program covers all aspects of RSPO P&C including supply chain and traceability. Program for the 2014 have been implemented. Regular assessment of on-the-job training conducted to ensure understanding among the employees.	Complied									

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Criterion / Indicator	Assessment Findings	Compliance
4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	Training record: 1) Safety training on tractor driver dated 1/12/15, 8 drivers attended. 2) Chemical spraying training dated 3/12/15, 8 persons attended. 3) Schedule waste training (handling and receiving) dated 1/12/15, 2 workers attended. 4) PPE training dated 24/11/15, 8 workers attended. 5) Harvesting & loose fruit collection training dated 19/11/15, 18 workers attended. 6) Scheduled Waste Training dated 11/12/2015. 7) SOP for CPO dispatch (critical point training) dated: 9/12/2015. 8) Boiler and Power House Training dated: 2/12/2015. 9) Safety Training (PPE/ PTW/First Aid/ Emergency Response) dated: 2/12/2015	Complied
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity		
Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	The IOI sustainability team has prepared the environmental aspect and impacts assessment in term of Environmental Impact Assessment, management Action Plans and Continual Improvement Plans from January 2015 till December 2015 for Pamol Kluang region. The review conducted through discussion with stakeholders on 17/11/2015. Signed Environmental Policy on 4/1/2008 <u>Pamol Timur and Unijaya Estate:</u> Reviewed on 25/11/2015.	Complied
5.1.2 Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	No changes in the operation at the time of audit. However, the mill has planned to install biogas plant by 2017 to reduce the methane gas released from the POME. It also installed GreenTube to minimize solids to the minimum level and thus reducing the frequency of de-sludging for the ponds. The current identified impacts are prepared with management plan to mitigate negative impacts.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.3</p> <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>No changes in the operation at the time of audit. The plan is being reviewed on yearly basis with latest review was done on 20/11/2015.</p> <ul style="list-style-type: none"> • Effluent monitoring records: Monthly Analysis of Effluent Samples report ref. PKPOM/14/11/2015 dated 14/11/2015 by environmental consultant; parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Samples were taken from each point of treatment in the system consist of raw pond, acid ponds, digester tanks and final pond before field application. BOD limit for land application <5000mg/L were met as well as all parameters that were within allowable limit. • Annual monitoring of natural stream (Sungai Sembrong) was also conducted by the mill. Latest sampling done on 25/6/2015, Water Quality Monitoring Report SUST-WQI/sa-023/2015 dated 17/11/2015. Report shown that water samples from all points were within allowable limit of Class III/IV of INWQS accordingly • Boiler stack sampling records: Isokinetic Stack & Air Emission Monitoring for Boiler No. 2 on 30/1/2015 by NM Laboratory (Johor) Sdn. Bhd. (Report ref. AEMR(J)/15-01/06; dated February 2015). Result shown the stack emissions are within limit at 66.5 mg/m³ for particulates, 0.85 mg/m³ for SOx and 0.04 mg/m³ NOx. Latest result done on 30/7/2015 was 0.138g/Nm³ (report ref.: ENV/PAMOL/ISO/2015) • Ambient Air Quality monitoring ref. LA/1115/001/01-04 dated 6/11/2015 by EnviChem Consults Sdn. Bhd. where result shown the Total Suspended Particulate (TSP) readings at few locations within the mill was within the Malaysian Air Quality guidelines of below 260µg/m³ <p>Online scheduled waste inventory & consignment – updated as of 31/7/2015 where the quantity and storage period were within allowable limit. Latest Scheduled Waste disposal done on 24/6/2015, consignment # 0064692 for SW 322, # 0070232 (SW 410), # 0064691 (SW 409), # 0070233 (SW 110), # 0070234 (SW 305) and # 0064693 (SW 324) by Kualiti Alam Sdn. Bhd.</p>	<p>Complied</p>
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p> <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>HCV assessment has been reviewed on November 2015 by the executive from the sustainability team who has attended HCV training. There were only HCV 6 has been identified in Pamol Timur Estate (worship place). Monitoring and maintenance for the HCV 6 has been planned and monitored. The "Bukit Dyne" covering an area of 2.3ha identified as HCV through the HCV assessment at Pamol Timur estate is continued to be maintained.</p>	<p>Complied</p>

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5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	RTE study/assessment has been completed on 20/11/2015 – established action plan for monitoring species within and surrounding estate compound including training programs for workers and illegal hunting prohibition with patrolling by carried out by security personnel. Since estates are located near township and surrounded by other plantations and villages, HCV 6 identified in Pamol Timur Estate (worship place) is maintained and managed by localised workers committee. Protected species such as monitor lizards were cited.	Complied
5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. The estates have installed signboards at prominent areas to prohibit illegal hunting, disturbance of protected areas and the lighting of fires. Inspection of housing areas and interview of residents confirmed workers were aware of the company policy that prohibits illegal hunting and collecting activities.	Complied
5.2.4 Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	IOI sustainability team has prepared a Management Plan for protection of the HCV area in Pamol Timur estates and at Mill housing site complex that is based on habitat protection as well as enhancement of the area.	Complied
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	The existing HCV is worship places at estates and “Bukit Dyne” at Pamol Timur estate. Local communities have access to the worship places.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		

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<p>5.3.1</p> <p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>Waste sources have been identified accordingly by both the mill and estates. Documentation was done as a waste management plan which was being reviewed by respective operating units on annual basis.</p> <p>Visits made to Pamol Kluang Mill together with Pamol Timur and Unijaya estates showed that all waste products and sources of pollution were identified and documented. The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. EFB, POME, Stack emissions and Boiler ashes were maintained and monitored at the Mill.</p> <p>Scheduled Waste identified included spent hydraulic oil (SW 305), spent lubricant oil (SW 306), used chemical containers / drums (SW 409), used filters SW 410) and used batteries (SW 102).</p> <p>Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly.</p>	<p>Complied</p>
<p>5.3.2</p> <p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>Based on policy to reduce, reuse and recycle, the management of used chemicals and containers were done in accordance Scheduled Waste regulations.</p> <p>For estates, the empty pesticides container were collected in scheduled waste store after being triple rinsing and punctured at the bottom of the container.</p> <p>Stores for scheduled waste were inspected at audited sites in mill and estates and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p>	<p>Complied</p>

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<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Waste management plan involved cooperation between the mill and estates which included the following:</p> <ul style="list-style-type: none"> • Waste reduction plan from palm oil mill including EFB application programs – for year 2016 supporting timely evacuation of EFB from mill for field application at a rate of 40mt/ha • Dried POME application on low productivity area at a rate of 4 bags/palm • Waste reduction plan for workshop, lubricant store and empty chemical drums – handling of scheduled waste <p>Pamol Kluang Mill:</p> <ul style="list-style-type: none"> • Online scheduled waste inventory & consignment – updated as of 15/12/2015 where the quantity and storage period were within allowable limit. Latest Scheduled Waste disposal done on 29/9/2015, consignment # 20151215148UHLY3 for SW 409, # 2015121514PM68Y0 (SW 410), # 2015121514GXLV98 (SW 305), and # 2015121514W2OEB7 (SW 306) by OLST Petro-Chemical Sdn. Bhd. <p>Pamol Timur & Unijaya Estate:</p> <ul style="list-style-type: none"> • Online scheduled waste inventory & consignment – updated as of 16/12/2015 where the quantity and storage period were within allowable limit. Latest Scheduled Waste disposal done on 26/11/2015, consignment # OPC 13142 for SW 410 – Contaminated cotton rags, # OPC 13133 (SW 306), # OPC 13132 (SW 305), # OPC 13139 (SW 410-contaminated filter) and # OPC 13134 (SW 409) by OLST Petro-Chemical Sdn. Bhd. <p>Inventory of clinical waste was recorded separately from other scheduled waste category. Latest Clinical Waste (SW 404) disposal was done on 4/12/2015 through Pantai Medivest and information recorded in Clinical Waste Record log book. Sixth schedule (consignment) s/n: CW0000927 and s/n: CW0001066 dated 6/11/2015.</p>	<p>Complied</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
<p>5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement.</p> <p>Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Monthly records of energy consumption of non-renewable fuel per metric tonne of palm product at the Mill were available as following: Pamol Kluang Mill diesel usage = 0.09 liter/mt FFB (Jan –Oct 15)</p> <p>At the estates, diesel consumption per metric ton FFB was also monitored on a monthly basis. It was verified that energy usage are being monitored at the operating units for better control and comparison of trends. Domestic electricity was supplied by TNB while diesel was used for vehicles and machineries. Following diesel consumption was obtained during the site visit: Pamol Timur Estate = 1.08liter/mt ffb (Jan – Nov 2015) Unijaya Estate = 2.64liter/mt ffb (Jan – Nov 2015)</p>	<p>Complied</p>
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		
<p>5.5.1 There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -</p>	<p>No burning activities during land preparation for replanting. Field visit confirmed that previous old palms are felled, shredded and stacked in the inter row</p>	<p>Complied</p>
<p>5.5.2 Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -</p>	<p>The operating units have adhered to the zero burning policy for replanting at the estates. There was also no evidence of any burning of domestic waste at the housing line sites and at the domestic landfills of the estates during on site field assessment.</p>	<p>Complied</p>
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>		

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Criterion / Indicator		Assessment Findings	Compliance
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Based on the assessment done by Pamol Kluang Mill of all polluting activities as of the Environment Aspect and Impact assessment, identified source was boiler chimney. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring of dust particulate. Boiler stack sampling records: Air Emission Monitoring for Boiler No. 1 on 22/4/2015 by PAC Testing & Consulting Sdn. Bhd. (Report ref. # PAC-AE-150414; dated 6/5/2015). Result shown the stack emissions are within limit at 0.37 g/Nm ³ for particulates and 0.01 g/Nm ³ for NO _x while not detected SO _x .	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH ₄) emission through POME treatment. The company are in process of obtaining proposals to construct methane capture facilities in POME treatment pond. Project arrangement handled by HQ and the project expected to complete the construction of the biogas plant by 2017. Other less significant GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical and fertilizer consumptions.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring of the GHG quantity was done through its custom GHG calculator where annual quantification of all GHG sources was input into the calculator. Default values of emissions factor Calculation of the GHG emissions were derived from publicly available sources including World Resource Institute and BioGrace. These calculations were done in HQ level where GHG calculations were done separately between the mill and estates. Reporting of the GHG to RSPO ERWG has been implemented since Jan 2015. Sampled of the reporting was as following: Emailed to ERWG dated 7/12/2015 by Sustainability Department Executive on behalf of Pamol Kluang Palm Oil Mill. Recommendation to install methane capture and biogas plant in next year budget based on management review meeting 15/10/2015.	Complied

Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.

Criterion 6.1:

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

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Criterion / Indicator	Assessment Findings	Compliance
6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Aspects of estate and mill management related to social issues identified through Social Impact Assessment. Annual review is conducted through stakeholder meetings and communication with stakeholders. Social Impact Assessment has been conducted on the 20/11/15. It is noted that all the operating units maintain good relationship with internal and external stakeholders such as employees, contractors, surrounding communities and regulatory bodies. Improvement on social obligation includes improvement of the housing and facilities for the employees and contribution to the surrounding community development.	Complied
6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The participation of both internal and external stakeholders (including local from Governmental organizations) which was evident with the list of participants recorded. Minutes of meetings as appended to the SIA Report were maintained as records. List of stakeholders were verified and included government bodies, group associated stakeholders, neighbouring estates and small holders, management staff and workers representatives and Contractors/suppliers. The external stake holder meeting was conducted on the 17/11/15 with a total of 47 attendances and internal stakeholder meeting was conducted on the 2/1/2015. For Internal stakeholder meeting for Pamol Timur, the meeting was conducted on the 13/11/15. Internal stakeholder meeting for Unijaya estate was conducted on 24/11/15 with worker representatives and positive comments has been given.	Complied
6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Social management plan has been included in the SIA assessment to mitigate the negative impacts with time frame and person in charge. There were positive & negative impacts raised by internal & external stakeholders. Negative Impact raised was on road upgrading on flood area, pest control issues on neighbouring estate, housing repair and other facilities. The action plan has been planned and implemented and monitored from time to time.	Complied
6.1.4 The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	SIA action plan will be updated on yearly basis where the latest has been updated on 20/11/15 for Pamol Complex for external stakeholder issues. As for Pamol timur estate, the SIA action plan has been updated on the 13/11/15. SIA action plan for Unijaya has been updated on 24/11/15.	Complied
6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder scheme within the Pamol Kluang complex.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
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.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Consultation and communication procedure for stakeholders is through IOI website: www.ioigroup.com or otherwise for those who do not have access to internet may follow on-site Stakeholders Request Procedure which available at operating units. Verbal request by phone call are made by government departments through IOI Group General Line: +60389478888 or written request addressed to: Two IOI Square, IOI resort, 62502 Putrajaya, Malaysia is still in practice. Written procedure held on file Management Plan point 10.0 Stakeholders Request Procedure. There were no changes since the last visit.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The Mill Engineer and assistant estate manager has been appointed as the Social Liaison Officer and stated in the Social impact assessment.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	The mill and estates have an updated list of stakeholders. It includes internal and external stakeholders such as government departments, contractor, suppliers, non-governmental organisation and workers representatives.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	Grievance procedure included in the "Management Plan". Complaint and grievances have been recorded in "Complaint/Grievance Book" since July 2007 which is also called as green book. The "Grievance/Complaints" book is used to record all enquiries beside complaints and grievances. Inspection of the records indicated that the system resolved all disputes in a timely manner. Interview with internal and external stakeholders confirmed that there were no pending complaints. Over the past 12 months, there was only 1 entry were made for the Mill on the request of repairing of playground facility on 13/12/15 and was in- progressing. Record of complaints in the Pamol Timur estate and Unijaya estate have been recorded in the complaint book where the action has been followed accordingly.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	Internal and External disputes/grievances/enquiries are documented in the green book. ECC (Employment Consultative Committee) for resolving employment issues at local level is documented through minutes of meetings. While the external issues was documented through SIA action management plan after the external stakeholder meeting.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	No cases requiring any negotiation or compensation pertaining to these criteria. There have been no changes in this status as at the period of verification on site.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP for calculating and distributing fair compensation which includes various factors such as gender differences, ownership and access to land, rights of long-established communities, differences in ethnic group's proof of legal versus communal ownership of land have been established. However, there is no any issue at Pamol Kluang Certification unit.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No cases requiring any negotiation or compensation pertaining to these criteria. There have been no changes in this status as at the period of verification on site.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	Documentation of pay and condition includes pay slips with details of the calculation. The records are prepared and maintained by the Chief Clerk at mill and estates and available for verification. The payment slips for foreign workers at the estates sighted are easy to understand and this fact was further verified with migrant workers. Payments are made latest by 7th of each month and consistent with Minimum Wage Order 2012. Holidays entitlements as required by the laws are satisfactorily fulfilled, e.g. annual leaves, public holidays, and maternity leave. POM workers verified: workers ID # PMM0168, PMM 0167 and PMM0166. Pamol Timur workers verified: workers ID # PTE0150, PTE5030, PTE1594, PTE1674. Unijaya estate workers verified: workers ID # UJE0883 and UJE0854.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -	Contract of employment are available and understood by workers. Pay and conditions have been explained to workers by the plantation management during the induction program conducted at the time of arrival. The document covers all issue such as working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, and reasons for dismissal, period of notice made available in English/ native language and it was acknowledged by the workers.	Complied
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance -	All the internal and external workers are provided with free housing. Water and electricity from government supply, has been provided. Estate clinic has been provided with registered HA (License# Q1841- since 14/2/2000) and free medication. There are government schools located in the estate. During the interview with workers at the sites confirmed that they have access to all the facilities. Interviews with local and foreign workers confirmed that all have there is no any issues at the time of assessment conducted.	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	During the assessment, interview with employees and stakeholders confirmed that access to food are adequately and sufficiently provided and the employees have ability to purchase food of their choice through internal and external shops available in each operating units and within the vicinity of the operating units.	Complied
Criterion 6.6:			
The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	The company has statement on workers freedom of association (Polisi Hak Sama Rata dan Kebebasan Berpersatuan Pekerja) dated 2 January 2009.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Foreign workers are represented in the Employee Consultative Committee (ECC). Last ECC meeting (POM) was conducted on 20/10/15 attended by 6 workers representatives. Some issues were highlighted has been solved and followed accordingly which documented in the meeting minutes. Some compliment has been made by the employees towards the management efforts to fulfil the request such as housing and facilities requirement. As for Pamol Timur Estate, the ECC meeting was conducted on the 17/6/15 with attendance of 25 workers including worker representatives and management team. No Negative issue has been raised in the meeting. Unijaya estate ECC meeting was conducted on 30/10/15 with present of 17 worker representatives. Issues raise such as request of repairing of facilities has been followed accordingly by the management team and documented in the minutes of meeting.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The minimum age for employment is 18 years old. Inspection of employee register confirmed that copy of ID for local employees or passport for foreign employees is checked and verified to ensure the age condition is fulfilled. During field visit children were not observed at any of the working place at both mill and estate. This was also re-confirmed with stakeholders.	Complied
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.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Equal Opportunity policy dated 20 Aug. 2009 approved by the IOI Group Plantation Director. This policy is displayed at the notice boards along with the other policies and further communication during stakeholder meeting & ECC meeting. Interview with staff and workers reveal they are aware of the policy“ The policy stressed on non-discrimination based on race, caste, nationality, religion, gender, sexual orientation, disability/handicap, and union/political affiliations. However, positive discrimination for the benefit of certain society groups may be allowed after consultation.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Interview with staff and workers as well as external stakeholders reveal that there is no discrimination between ethnic groups and among employees. Gender equality is noted where there are female mandors employed and paid equally for the same job carried out. Interviews with local & foreign workers revealed satisfaction with the estates for job opportunities and they enjoy all common welfare amenities like free housing, free water and electricity supplies and medical care. They are aware that their grievances can be raised through various channels, especially the regular roll call meetings they are attending every morning.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Depending on the nature of work positions, The operating unit management takes into considerations the needs for technical qualifications/experience and related skills in recruitment selection, hiring and promotion exercises. It was verified that the promotions to higher position at the estates and Mill were based on evaluations which considered the skill, capabilities, qualities and medical fitness of the employees.	Complied
Criterion 6.9:			
There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Policy on preventing sexual harassment "Policy on the prevention and eradication of sexual harassment in the workplace" dated 6/12/2006 is available for prevention and eradication of sexual harassment in the workplace. At the time of audit there are no reported cases of sexual and other forms of harassment noted or informed by the stakeholders interviewed. Gender Committee comprised of female representatives communicate the awareness on preventing harassment.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Policy on reproduction rights of all has been established through 'special labour policy and procedure' dated 2/12/15. This show the management protect the reproductive rights of the workers especially women. Female workers and staff interview reveal that they are aware of their right to reproductive and entitled for two months paid maternity leave.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Grievance mechanism which respects anonymity and protects complainants has been established, implemented, and communicated to all employees. Interview with employees reveal that they are aware of the existing mechanism for complaint submission. Mill has formed gender committee specifically to address women issues. Last meeting was done on 25/9/14. No issues were highlighted during the meeting and the sexual harassment reporting procedure has been refreshed during the meeting. Pamol Timur estate: Last meeting 30/11/15 attended by 16 members. No any grievances noted. Unijaya estate: Last meeting 15/10/15 attended by 16 members. No any grievances noted.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	The palm oil mill has the records of current and past FFB prices which in accordance to MPOB pricing. There is no any FFB sourced from external suppliers or smallholders.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	FFB not sourced from smallholders or out-growers. However, the mill personnel able to explanation the FFB pricing mechanism issued by MPOB.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Stakeholder interviews conducted during this assessment with suppliers, contractors, and relevant parties including local and foreign workers confirmed that understand the contractual agreements (such as terms and payment) they enter into with the operating units. They also consider the business transactions as fair and transparent. Sample contract of Loading EFB- SP Shine Enterprise (Contract No.: PMM004-14/15) dated 1/7/2015 was checked. At the Pamol Timur estate, FFB transport, grass cutting and garbage collection contract (No.: PTE/002-15/16) dated 1/7/2015 and EFB transport (Contract no.: PTE/005-15/16) were checked. All contracts are fair, legal, and transparent and understood by the contractors. This was re-confirmed by contractors during interview.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Payment record of the above contractor for the month of November 2015 found as per the contract term (Payment voucher No.: 009/12 dated 07/12/15, Payment voucher no.: 002/12 dated 05/12/15, Payment voucher no.: 003/12 dated 05/12/15). Payments are made in a timely manner as per contract terms and re-confirmed by the contractors interviewed.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance -	All operating units contribute to local development through consultation and communication with the local head of villages. The company have cooperated with the Nearby Kluang Jail Department that allowed the officer to collect grass in the estate compound to be used for their cattle farming project. The company had give help in term of donation, EFB as fertilizer and housekeeping for the school compound where it was confirm through interview with the stakeholder. Employment opportunity is given to the locals at the nearby Kampong Gajah Village.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance -	No scheme smallholders in the supply base.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	Workers, staff and stakeholder interview confirm that there is no any form of forced labour or trafficked labour in the operating units. All employees have employment contract and paid the agreed national minimum wages.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -	There was no evidence of contract substitution and this was confirmed from interviews with workers and relevant stakeholders.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Special labour policy and procedure dated 2/12/2015 has been established. This policy covers the necessary aspects of human rights related issues. The policy has been recently communicated to all the staffs through meeting, briefing and notice board.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	IOI's Sustainability Policy Statement includes Human Rights and Workplace. This has been stressed in the IOI Corporation Berhad's 2014 annual report. This policy covers the necessary aspects of human rights related issues. Interview during the assessment reveal that employees understand their right. IOI head office is in process of reviewing their various social policies for integration into the group.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia.	Complied
Principle 7: Responsible development of new plantings Pamol Kluang Palm Oil Mill Certification unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature area are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Continual improvement plans and implementation covers planting of beneficial plants to reduce the leaf eating pest damage. This has helped the estates to minimise use of pesticides. There was no class 1a or 1b pesticide used at the time of audit. Natural vegetation such as soft grass is maintained. Only selective weeding carried out with agrochemical. All the estate’s policy is to minimize the use of pesticides in accordance with IPM. No prophylactic use of pesticides noted during the field visit and records verification. Greenhouse gas (GHG) emissions have been identified as one of the environmental impact issue and polluting factor. Replanting program has been planned to replace the aging palm tree.</p> <p>Pamol Kluang mill has plans to develop methane capturing mechanism (biogas plant) by 2017. At the moment regulatory measures are carried out to monitor the emission from processing activities. Social Action Plans are working towards improving stakeholder relationship through engagement and dialogue.</p> <p>Contribution to local development such as mosque activities, temple festival and schools are continuously implemented. Upgrade of community hall and upgrade of road at linesite to probase has been included in the 5 years business plan.</p>	<p>Complied</p>

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Appendix B: IOI Corporation Berhad – Time Bound Plan

No	Operating Unit	Certification Status	Updated information for Partial (Clause: 4.2.4)
1	Pamol POM, Sabah	Recertification completed in 2014	No outstanding issues.
2	Sakilan POM	Recertification completed in 2015	No outstanding issues.
3	Pamol Kluang POM	Recertification completed in 2015	No outstanding issues.
4	Gomali POM	Recertification completed in 2015	No outstanding issues.
5	Baturong POM	Recertification completed in 2015	No outstanding issues.
6	Bukit Leelau POM	Recertification completed in 2015	No outstanding issues.
7	Mayvin POM	Recertification completed in 2015	No outstanding issues.
8	Pukin POM	Certified in 2012	No outstanding issues.
9	Leepang POM	Certified in 2013	No outstanding issues.
10	Syarimo POM	Certified in 2013	No outstanding issues.
11	Ladang Sabah POM	Certified in 2013	No outstanding issues.
12	Morisem POM	Certified in 2013	No outstanding issues.
13	IOI-Pelita, Sarawak	Uncertified – Planned 2019 (New certification for IOI-Pelita (Sarawak) is pending resolution of land dispute and RSPO decision. No POM yet)	Settlement discussion and resolution with local community is presently still on-going. RSPO has been briefed on the 17 September 2015 and 27 October 2015 about IOI- Pelita Mediation Plans. There have been 2 meetings between IOI - Pelita and the LTK community since IOI's discussion with RSPO on the 9 November 2015 and another one on 1 December 2015 – where RSPO has attended the latter as an observer together with local expert from Sarawak) Law Professor specializing in the Rights of Indigenous Community) during the discussions. Next meeting dates are planned on 30 December 2015 or 12 January 2016 subject to receiving confirmation from all parties.
14	Unico POM-1, Sabah	Uncertified – Planned 2018 (Acquired in 2014. OP was planted before 2005. Supply base do consist of external / independent smallholders)	Certification preparation in progress. Delay is expected due to further monitoring of implementation of RSPO requirements with regards to the external FFB suppliers. Therefore, the external audit has been planned in 2018

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15	Unico Desa POM-2, Sabah	Uncertified – Planned 2017 (Acquired in 2014. OP was planted before 2005. Supply base comprise of own supply base only).	Certification preparation in progress.
16	PT SKS, Indonesia	Uncertified – Planned 2016 (Acquired in 2009 - new concession land). POM was commission in February 2015 and Governmental (HGU): "Hak Guna Usaha" application in progress.	Certification preparation in progress. Delay expected on the HGU. Note: NPP issue was considered resolved in May 2012 via letter from RSPO.
17	PT BNS, Indonesia	Uncertified – Planned 2017 (Acquired in 2009 - new concession land). POM was commission in February 2015 and Governmental (HGU): "Hak Guna Usaha" application in progress.	Certification preparation in progress. Pending the issuance of HGU.
18	PT BBS, Indonesia	Uncertified – Planned 2019 (Acquired in 2009 - new concession land). No POM yet. Governmental (HGU): "Hak Guna Usaha" application in progress.	Certification preparation in progress. Pending the issuance of HGU. NPP for on-going planting was completed and posted on RSPO website. Note: Discussion with RSPO on compensation for the accidentally cleared HCV is in progress. The alternative option of rehabilitation and restoration is also being planned.
19	PT KPAM, Indonesia	Uncertified – Planned 2020 (Acquired in 2010 - new concession land). No POM planned yet. Re-application of expired Governmental "izin lokasi" in progress and development planned in 2017.	HCV assessment completed. SEIA in progress. NPP notification will be follow once the HCV and SEIA assessments reports are completed and reviewed. Earliest expected in 2017.

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Appendix C: Certificate Details

IOI Corporation Berhad
 Pamol Plantations Sdn. Bhd.
 Pamol Kluang Palm Oil Mill,
 P.O. Box 1, 86007
 Kluang, Johor,
 Malaysia.
 Website: www.ioigroup.com
 RSPO Membership number: 2-0002-04-000-00

BSI RSPO Certificate No: RSPO 547027
 Date of Initial Certificate Issued: 16 March 2010
 Applicable Standards: RSPO P&C MYNI 2014; RSPO Certification System June 2007 (revised March 2011); RSPO P&C MY-NIWG 2014; RSPO Supply Chain Certification Standard 21 November 2014 Module D - CPO Mills: Identity Preserved

Pamol Kluang Palm Oil Mill and Supply Base					
Location Address		Pamol Kluang Palm Oil Mill, P.O. Box 86007 Kluang, Johor, Malaysia			
GPS Location		Longitude : 103° 23' 32.5"E Latitude : 2° 06' 39.49"N			
CPO Tonnage Total		49,162 mt			
PK Tonnage Total		10,242 mt			
CPO Claimed for Certification		49,162 mt			
PK Claimed for Certification		10,242 mt			
Own estates FFB Tonnage		203,841 mt			
Scheme Smallholder FFB Tonnage		NIL			
FFB Tonnage – Other adjacent estates (certified FFB from other group estate)		1,000 mt			
Estates	Production Area		Other Use (ha)	Certified Area /Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Pamol Timur Estate	1,346.00	765.00	185.59	2,296.59	26,300.00
Pamol Barat Estate	1,658.00	506.00	158.30	2,322.30	30,678.00
Mamor Estate	2,074.00	0.00	156.00	2,230.00	30,450.00
Unijaya Estate	1,027.00	150	83.64	1,260.64	21,643.00
Kahang Estate	2,278.00	0.00	142.00	2,420.00	69,370.00
Swee Lam Estate	938.00	326.00	102.85	1,366.85	25,400.00
Total	9,321.00	1,747.00	828.38	11,896.38	203,841.00

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Appendix D: Assessment Plan

PRELIMINARY AGENDA					
Date	Time	Subjects	Hafri	Hidhir	Kelvin
Monday 14/12/2015	AM	Audit Team travelling to the site.	√	√	√
	PM	Meeting external stakeholders	√	√	√
Tuesday 15/12/2015 Pamol Kluang Palm Oil Mill	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 	√	√	√
	09.00 – 12.00	Pamol Kluang Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.00	Pamol Kluang Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.00 - 16.30	Interim Closing briefing.	√	√	√
Wednesday 16/12/2015 Pamol Timur Estate	08.30 – 12.00	Pamol Timur Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	-
	10.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Workers Leader, contractor etc.)	-	-	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.00	Pamol Timur Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.00 - 16.30	Interim Closing Briefing	√	√	√

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Thursday 17/12/2015 Unijaya Estate	8.30 – 12.00	Unijaya Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.00	Unijaya Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.00 - 16.30	Interim Closing briefing.	√	√	√
	16.30 - 17.00	Closing Meeting: <ul style="list-style-type: none"> • Presentation of findings & reports • End of audit 			
Friday 18/12/2015	AM	Audit Team travelling back to KL.	√	√	√

Appendix E: Stakeholders Contacted

INTERNAL STAKEHOLDERS

<p>Pamol Kluang Mill Mill manager and staffs Boiler operators Engine room operators Electrician Store officer Weighbridge Clerk Lap Assistants Head of central workshop Clinic/hospital assistants Union Representative Foreign worker representative</p>	<p>Pamol Timur Estate Estate manager and staffs Field supervisor/mandore Harvesters Sprayers Housewives Union Representative Foreign worker representative</p>	<p>Unijaya Estate Estate manager and staffs Field supervisor/mandore Harvesters Sprayers Housewives Union Representative Foreign worker representative</p>
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EXTERNAL STAKEHOLDERS

<p>Government Departments Labour Department Department of Safety and Health Department of Environment</p>	<p>NGOs and others National Union of Plantation Workers - Kluang Branch Contractors Suppliers Estate Temple Committee</p>	<p>Local Communities Village representative Local neighbourhood community representative</p>
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Appendix F: CPO Mill Supply Chain Assessment Report (Module D-CPO Mills: Identity Preserved)

Requirements	Compliance
D.1. Definition	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). 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. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>The Pamol Kluang mill only receives certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products</p>
D.2 Explanation	
<p>D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
D.3 Documented procedures	
<p>D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard. 	<p>Latest written documented procedures The details include all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products. SOP ISCC/SOP/COC/3 dated 1 April 2015 for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB. This developed based on the RSPO SCCS 21 November 2014. The previous SOP was for SG. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The IP model is used because only certified FFB from own supply base.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>

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<p>D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Pamol Kluang Palm Oil mill has documented procedures (as per above in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.</p>
<p>D.4 Purchasing and goods in</p>	
<p>D.4.1 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p>	<p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Pamol Kluang mill have system to verify at the weighbridge.</p> <p>Validity check for the diversion crop.</p> <p>i) Gomali certification unit, certificate SGS-RSPO/PM-MY-00573, valid until 22/8/2020. (Jasin Lalang & Sagil Estate)</p> <p>ii) Pukin Management unit, certificate RSPO 927888 valid until 12/6/17. (Segamat Estate & Bukit Serampang)</p> <p>Sample of weighbridge ticket (Crop diversion)</p> <p>i) Sagil Estate DO# 53543 WB# 235012, date: 5/8/15 lorry: JQG 3118, weight: 34.27 Mt Certified FFB identification: CSFFB/IP.</p> <p>ii) Segamat Estate DO#40864 WB# 235154, date: 8/8/15 lorry: BHA 6101, weight: 25.09 Mt Certified FFB identification: CSFFB/IP.</p> <p>iii) Bukit Serampang Estate DO# 9467 WB# 235123, date: 7/8/15 lorry: AET6135 weight: 35.42 Mt Certified FFB identification: CSFFB/IP.</p> <p>iv) Jasin Lalang Estate DO# 27446 WB# 23506, date: 9/8/15 lorry: JKY 374 weight: 33.69 Mt Certified FFB identification: CSFFB/IP.</p>

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D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of this procedure and stated in the documented procedure
D.5 Record keeping	
D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel meal at Pamol Kluang Palm Oil mill. PK is sold to external independent kernel crushing plants. Daily records are prepared at the entry point at the weighbridge. Daily summary and three-monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit.
D.6 Processing	
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing. No non-certified FFB received.
D.6.2 The objective is for 100 % segregated material to be reached.	Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records. This ensures that 100% segregated materials are reached.

Actual Certified Palm Production - 01 December 2014 – 30 November 2015 (RC)

Mill	Capacity	CPO	PK
Pamol Kluang Palm Oil Mill	60 mt/hr	52381	11356

Actual Sales of Certified Palm Products - 01 December 2014 – 30 November 2015 (RC)

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Pamol Kluang Palm Oil Mill	19574.14 mt	nil	Sales records from Etrace

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Actual Certified FFB Received Monthly – 01 December 2014 – 30 November 2015

Month	Certified FFB from Own Supply Base						Certified FFB from Group Estate				Total FFB/Month
	Pamol Timur Estate	Pamol Barat Estate	Mamor Estate	Unijaya Estate	Kahang Estate	Swee Lam Estate	Sagil Estate	Segamat Estate	Bukit Serampang Estate	Jasin Lalang Estate	
Dec 2014	2,119.54	3,035.91	4,456.20	1,655.81	3,799.70	1,770.01	-	-	-	-	16,837.17
Jan 2015	1,938.69	2,765.90	3,449.82	1,700.99	3,440.78	1,337.56	-	-	-	-	14,633.74
Feb 2015	2,101.43	2,350.46	3,643.58	1,888.48	2,510.35	1,522.69	-	-	-	-	14,016.99
Mar 2015	2,339.75	2,699.23	3,920.95	2,149.88	3,215.62	2,210.17	-	-	-	-	16,535.60
Apr 2015	2,489.38	3,304.51	4,247.58	2,208.73	3,853.26	2,825.64	-	-	-	-	18,929.1
May 2015	2,702.48	2,935.70	4,395.95	2,289.12	4,740.51	2,553.51	-	-	-	-	19,617.27
Jun 2015	2,427.07	2,794.02	4,203.75	1,914.25	4,640.86	2,578.57	-	-	-	-	18,558.52
Jul 2015	2,741.21	2,912.18	4,851.01	2,421.08	5,326.81	2,872.79	-	-	-	-	21,125.08
Aug 2015	2,502.08	2,853.78	4,989.49	1,783.97	5,734.89	2,021.81	99.85	185.39	35.42	96.94	20,303.62
Sep 2015	2,754.84	2,828.14	5,142.01	2,085.69	6,173.23	2,216.76	-	-	-	-	21,200.67
Oct 2015	2,616.65	2,854.06	5,642.62	2,136.74	7,127.69	2,405.45	-	-	-	-	22,783.21
Nov 2015	2,098.82	2,558.84	4,959.06	1,317.06	6,552.06	1,988.88	-	-	-	-	19,474.72
Total	28,831.94	33,892.73	53,902.02	22,264.8	57,115.76	26,303.84	99.85	185.39	35.42	96.94	224,015.69

Validity check on diversion crop: Gomali certification unit, certificate SGS-RSPO/PM-MY-00573, valid until 22/8/2020. (Jasin Lalang & Sagil Estate) and Pukin Management unit, certificate RSPO 927888 valid until 12/6/17 (Segamat Estate & Bukit Serampang)

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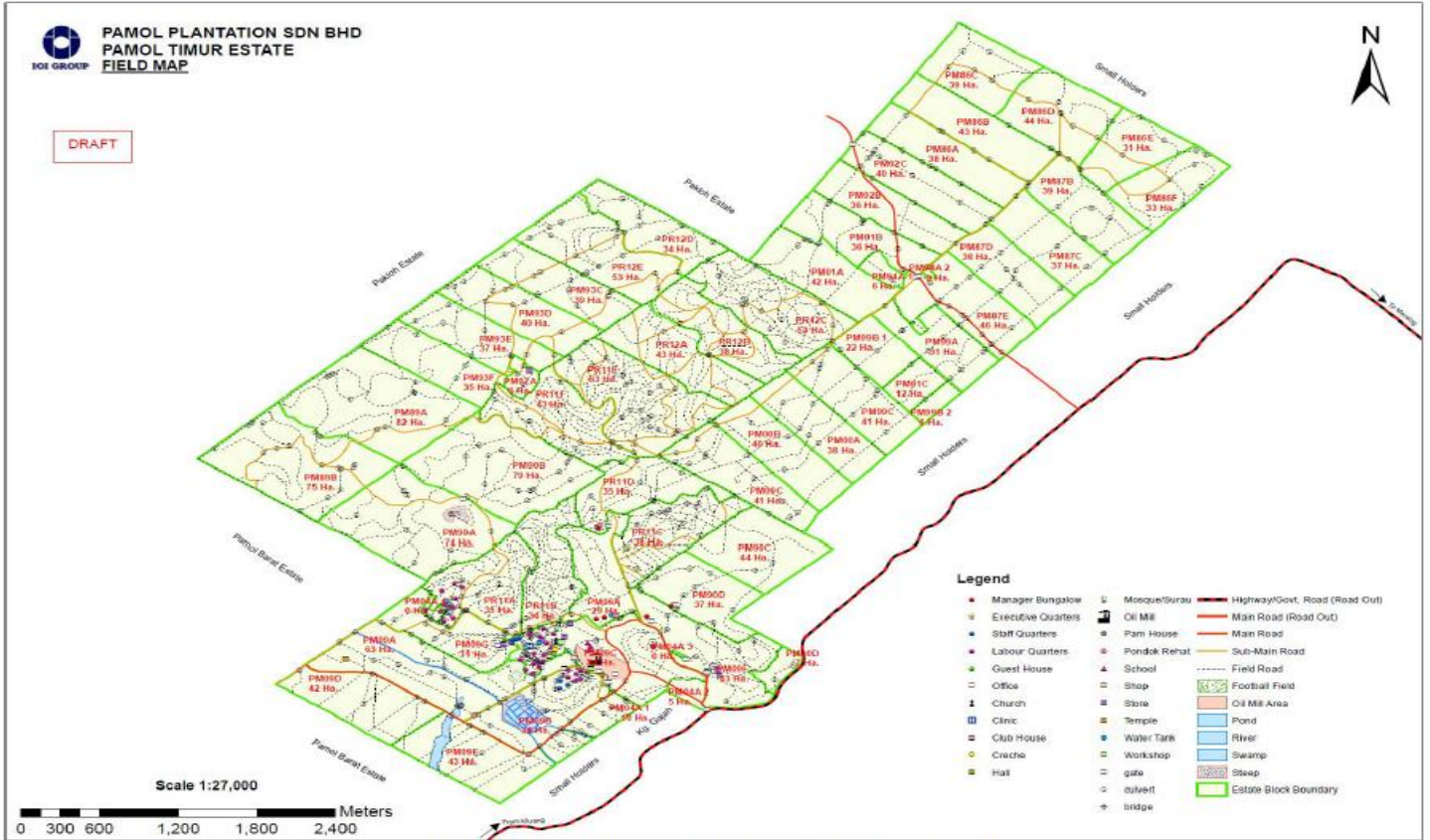
Appendix G: Location of Pamol Kluang Mill and Supply Base in Johor, Malaysia



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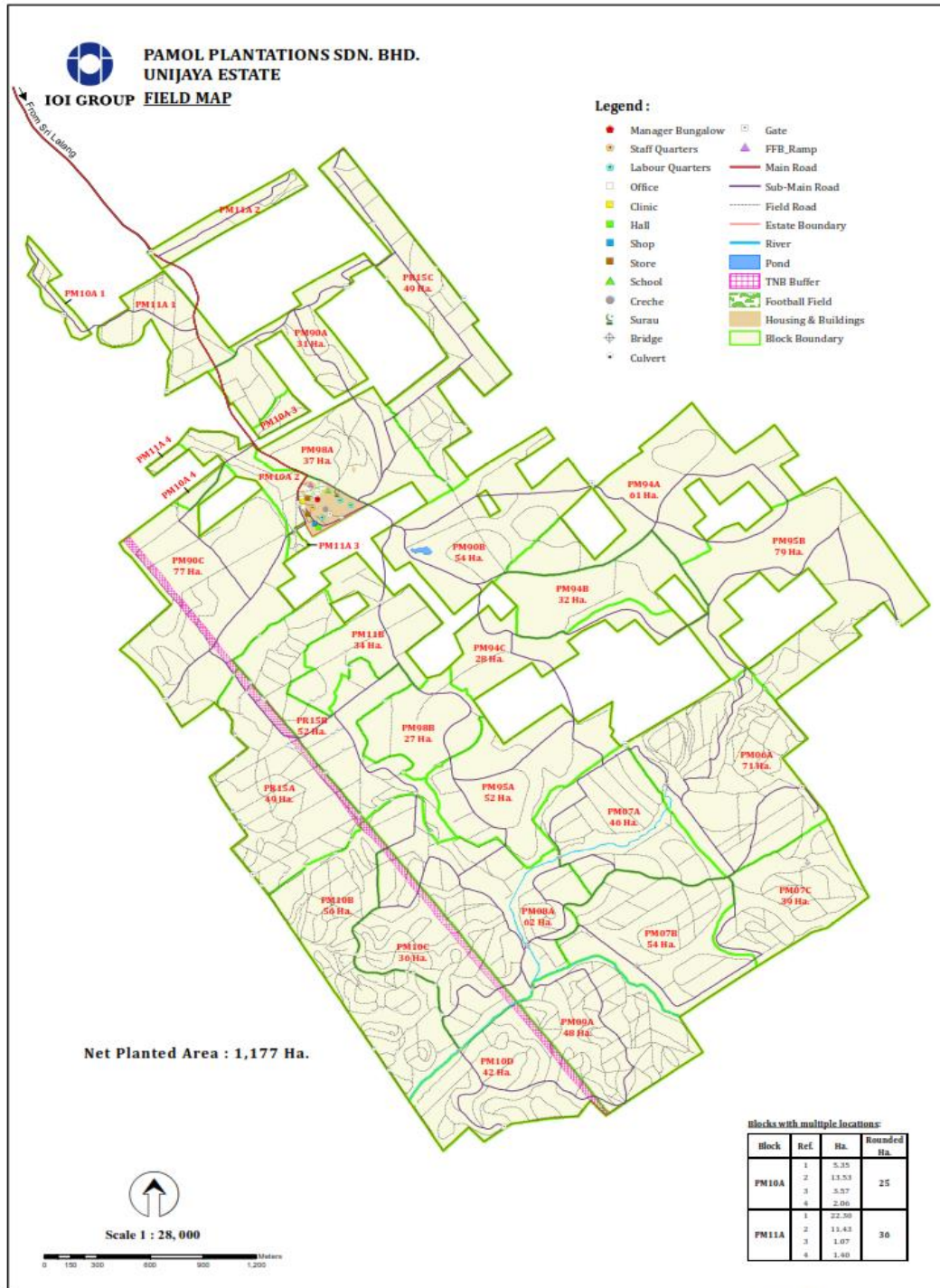
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Appendix H: Pamol Timur Estate Field Map



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Appendix I: Unijaya Estate Field Map



Appendix J: List of Abbreviation Used

ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CAR	Corrective Action Request (for nonconformity)
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
MAPA	– The Malayan Agricultural Producers Association
MSDS	Material Safety Data Sheet
MY-NI	Malaysian National Interpretation
NUPW	National Union of Plantation Workers
PB	Pamol Barat
PK	Palm Kernel
PT	Pamol Timur
PPE	Personal Protective Equipment
RC	Recertification
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure