

**RSPO PRINCIPLE AND CRITERIA –
1st ANNUAL SURVEILLANCE ASSESSMENT (ASA2_1)
Public Summary Report**

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|--|
| Client Company name (Parent Company): SIPEF Group, Belgium |
| Client company Address: <u>Kasteel Calesberg – Calesbergdreef 5</u> <u>B-2900 Schoten – Belgium</u> |
| Certification Unit: Hargy Oil Palms Limited Including Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo Palm Oil Mill (multi-mill certification) Location of Certification Unit: Private Mail Bag Kimbe, Bialla, West New Britain Province, Papua New Guinea |

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Section 1: Scope of the Certification Assessment

| 1. Company Details | | | |
|---|--|---------------------------------|--|
| RSPO Membership Number | 1-0021-05-000-00 | Membership Approval Date | 07/12/2005 |
| Parent Company Name | SIPEF Group | | |
| Address | Kasteel Calesber – Calesbergdreef 5 B-2900 Schoten - Belgium | | |
| Subsidiary (Certification Unit Name) | Hargy Oil Palms Limited including Hargy Palm Oil Mill; Barema Palm Oil Mill and Navo Palm Oil MILL | | |
| Address | Private Mail Bag Kimbe, Bialla, West New Britain Province Papua New Guinea | | |
| Contact Name | Ian Winstanley | | |
| Website | http://www.sipef.be/ | E-mail | ian.winstanley@hargy.com.pg |
| Telephone | +675 983 1005; +675 983 1006 | Facsimile | +675 983 1191 |

| 2. Certification Information | | | |
|-------------------------------|--|------------------------------------|------------|
| Certificate Number | RSPO 535739 | Date of First Certification | 09/04/2009 |
| | | Certificate Start Date | 05/01/2019 |
| | | Certificate Expiry Date | 04/01/2024 |
| Scope of Certification | Production of CPO and PK at Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo palm Oil Mill and 3 Supply Estates, namely Hargy Estate, Navo Estate and Pandi Estate including smallholder growers and marketing activities through SIPEF N.V. | | |
| Applicable Standards | RSPO Principle & Criteria Papua New Guinea, National Interpretation 2017; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D Identity Preserved) | | |

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

| 4. Location(s) of Mill & Supply Bases | | | |
|---------------------------------------|---|---|-------------------|
| Name (Mill / Supply Base) | Location [Map Reference #] | GPS Coordinates (Note for Auditors: Deg °, Minutes ', Seconds "; The format must be two decimal points) (Eg. 3° 51' 14.01" N) | |
| | | Latitude | Longitude |
| Hargy Palm Oil Mill | Bialla, West New Britain Province, PNG | 05° 18' 40.05" S | 151° 00' 39.46" E |
| Barema Palm Oil Mill | 30 km of Bialla, West New Britain Province, PNG | 05° 12' 40.25" S | 151° 07' 51.10" E |
| Navo Palm Oil Mill | 60 km of Bialla, West New Britain Province, PNG | 05° 05' 38.86" S | 151° 13' 28.03" E |
| Hargy Estate | Bialla, West New Britain Province, PNG | 05° 17' 47.77" S | 151° 03' 28.03" E |
| Navo Estate | 60 km of Bialla, West New Britain Province, PNG | 05° 05' 38.41" S | 151° 13' 30.01" E |
| Pandi Estate | 80 km of Bialla, West New Britain Province, PNG | 05° 00' 44.29" S | 151° 25' 27.12" E |
| Smallholders* | Bialla, West New Britain Province, PNG | 05° 18' 40.05" S | 151° 00' 39.46" E |

*Smallholder office is located at Hargy Palm Oil Mill

| 5. Description of Supply Base | | | | | |
|-------------------------------|--|-------------|-----------------------------------|--------------------|-----------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Hargy Estate | 4,481.34 | 0 | 2,330.35 | 6,811.69 | 65.79 |
| Navo Estate | 6,039.16 | 0 | 1,252.23 | 7,291.39 | 82.83 |
| Pandi Estate | 3,101.04 | 0 | 3,264.57 | 6,365.61 | 48.72 |
| Subtotal | 13,621.54 | 0 | 6,847.15 | 20,468.69 | 66.55 |
| Smallholders | 13,874.73 | 0 | 18.00 | 13,892.73 | 99.87 |
| Total | 27,496.27 | 0 | 6,865.15 | 34,361.42 | 80.02 |

| 6. Plantings & Cycle | | | | | | | |
|----------------------|-------------|----------|----------|---------|---------|----------|----------|
| Estate | Age (Years) | | | | | Mature** | Immature |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Hargy Estate | 1,096.67 | 621.98 | 2,641.65 | 121.04 | 0 | 3,384.67 | 1,096.67 |
| Navo Estate | 805.39 | 2,028.63 | 3,205.14 | 0 | 0 | 5,233.77 | 805.39 |

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| | | | | | | | |
|-------------------|-----------------|-----------------|------------------|---------------|----------|------------------|-----------------|
| Pandi Estate | 0 | 3,101.04 | 0 | 0 | 0 | 3,101.04 | 0 |
| Subtotal | 1,902.06 | 5,751.65 | 5,846.79 | 121.04 | 0 | 11,719.48 | 1,902.06 |
| Smallholders | 2,699.00 | 99.92 | 11,075.81 | 0 | 0 | 11,175.73 | 2,699.00 |
| Total (ha) | 4,601.06 | 5,851.57 | 16,922.60 | 121.04 | 0 | 22,895.21 | 4,601.06 |

Note:

*Please note whether there is replanting (fill up P3.1 by auditor) or new planting (fill up P7 by auditor)

**Only Mature area is considered as production area

7. Certified Tonnage of FFB (Own Certified Scope)

| Estate | Tonnage / year | | |
|----------------------|------------------------------------|---------------------------------|-----------------------------------|
| | Estimated (Nov 2018 – Nov 2019) | Actual (Jul 2018 – Aug 2019) | Forecast (Nov 2019 – Nov 2020) |
| Hargy Estate | 154,749.85 | 107,278.81 | 117,677.13 |
| Navo Estate* | 255,931.62 | 177,108.07 | 118,530.60 |
| Pandi Estate* | 201,782.37 | 69,266.43 | 81,085.51 |
| Smallholders | 228,246.82 | 244,980.75 | 244,729.35 |
| Total | 840,710.66 | 598,634.06 | 562,022.59 |

Note:

Last audit was in August 2018. This audit period postponed until October 2019. The calculation period July 2018 – August 2019.

* The Estimated figure (FFB) for period Nov 2018 – Nov 2019 including Volume Extension.

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *

| Estate | Tonnage / year | | |
|--------------|------------------------------------|---------------------------------|-----------------------------------|
| | Estimated (Nov 2018 – Nov 2019) | Actual (Jul 2018 – Aug 2019) | Forecast (Nov 2019 – Nov 2020) |
| Nil | N/A | N/A | N/A |
| Total | | | |

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable

| Independent FFB Supplier | Tonnage / year | | |
|--------------------------|------------------------------------|---------------------------------|-----------------------------------|
| | Estimated (Nov 2018 – Nov 2019) | Actual (Jul 2018 – Aug 2019) | Forecast (Nov 2019 – Nov 2020) |
| Nil | N/A | | |

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| | | | |
|--------------|--|--|--|
| Total | | | |
|--------------|--|--|--|

| 10. Certified Tonnage | | | |
|------------------------------------|--|---|---|
| | Estimated (Nov 2018 – Nov 2019) | Actual (Jul 2018 – Aug 2019) | Forecast (Nov 2019 – Nov 2020) |
| Hargy Palm Oil Mill | | | |
| FFB | | FFB | FFB |
| Mill Capacity: 45 MT/hr | 162,178.14 | 155,346.12 | 119,303.42 |
| CPO (OER: 24.4%) | | CPO (OER: 22.92%) | CPO (OER: 23.36%) |
| SCC Model: IP | 39,571.41 | 35,607.22 | 27,874.61 |
| PK (KER: 5%) | | PK (KER: 5.66%) | PK (KER: 5.15%) |
| | 8,108.91 | 8,799.02 | 6,144.13 |
| Barema Palm Oil Mill | | | |
| FFB* | | FFB | FFB |
| Mill Capacity: 45 MT/hr | 201,782.37 | 201,783.38 | 227,062.13 |
| CPO* (OER: 24.4%) | | CPO (OER: 24.16%) | CPO (OER: 24.62%) |
| SCC Model: IP | 48,753.46 | 48,753.16 | 55,901.44 |
| PK* (KER: 5%) | | PK (KER: 5.08%) | PK (KER: 5.15%) |
| | 10,243.31 | 10,243.31 | 11,683.21 |
| Navo Palm Oil Mill | | | |
| FFB* | | FFB | FFB |
| Mill Capacity: 45 MT/hr | 255,931.62 | 241,504.56 | 215,657.02 |
| CPO* (OER: 23.5%) | | CPO (OER: 23.96%) | CPO (OER: 24.14%) |
| SCC Model: IP | 60,080.49 | 57,857.24 | 52,052.17 |
| PK* (KER: 4.7%) | | PK (KER: 4.56%) | PK (KER: 4.70%) |
| | 12,021.94 | 11,019.85 | 10,146.12 |
| Total FFB | 619,892.13 | 598,634.06 | 562,022.59 |
| Total CPO | 148,405.36 | 142,217.62 | 135,828.22 |
| Total PK | 30,374.16 | 30,062.18 | 27,973.46 |

Note:

Last audit was in August 2018. This audit period postponed until October 2019. The calculation period July 2018 – August 2019.

* The Estimated figure (FFB, CPO, PK) for period Nov 2018 – Nov 2019 including Volume Extension.

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| 11. Actual Sold Volume (CPO) | | | | | |
|-------------------------------------|----------------|-------------------------|-----|--------------|------------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| CPO (MT) | 118,172.01 | 0 | 0 | 0 | 118,172.01 |

| 12. Actual Sold Volume (PK) | | | | | |
|------------------------------------|----------------|-------------------------|-----|--------------|-----------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| PK (MT) | 21,919.68 | 0 | 0 | 0 | 21,919.68 |

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Suite 29.01, Level 29,
The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur
Tel +603 9212 9638
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site initial assessment was conducted from 30 September – 12 October 2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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

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

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between

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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

| Assessment Program | | | | | |
|--------------------------------------|--------------------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| Name (Mill / Supply Base) | Year 1 (Re-certification) | Year 2 (ASA 2_1) | Year 3 (ASA 2_2) | Year 4 (ASA 2_3) | Year 5 (ASA 2_4) |
| Hargy POM | X | X | X | X | X |
| Barema POM | X | X | X | X | X |
| Navo POM | X | X | X | X | X |
| Hargy Estate | X | X | X | X | X |
| Navo Estate | X | X | X | X | X |
| Pandi Estate | X | X | X | X | X |
| Smallholders | X | X | X | X | X |

Tentative Date of Next Visit: August 17, 2020 - August 31, 2020

Total No. of Mandays: 34 mandays

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2.2 BSI Assessment Team:

| Team Member Name | Role <i>(Team Leader or Team member)</i> | Qualifications <i>(Short description of the team members)</i> |
|-------------------------|--|---|
| Pratama Sedayu | Team Leader | Graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on the aspects of legal, supply chain for CPO Mills, estate best practices, environment management system, HCV and smallholder audits. He is fluent in both verbal/written in English and understand PNG culture. |
| Eko Purwanto | Team Member | Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2001. He has working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. He has completed lead auditor training courses for RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012), and RSPO SCC (2012). He has also completed training course of ISO 14001 (2012), Minaut Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). For the last 2 years, he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) audit for several plantations and mills since October 2012. During this assessment, he assessed on the aspects of mill and estate best management practices and supply chain for CPO mills. He is fluent in both verbal/written in English. |
| Yudwi Wisnu Rahmanto | Team Member | Holds a Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT Lead Auditor Course, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001 Auditor/Lead Auditor Course, ISO 14001, OHSAS 18001 Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. During the assessment he assigned to verify Best Practices Management, GHG and Continual Improvement aspect. He is fluent in both verbal/written in English. |

Accompanying Persons:

| No. | Name | Role |
|------------|-------------|-------------------------|
| 1 | Paul Maliou | Local Expert/Translator |

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2.3 Assessment Plan

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

| Date | Time | Subjects | PS | EP | YW | PM |
|---|-------------------------|--|----|----|----|----|
| Saturday, 28/9/2019 | | Flight Jakarta – Singapore | √ | √ | √ | |
| | | Flight Singapore – Port Moresby | √ | √ | √ | |
| Sunday, 29/9/2019 | | Flight Port Moresby – Hoskins | √ | √ | √ | |
| | | Travelling Hoskins – Hargy Oil Palms Limited | √ | √ | √ | √ |
| Monday, 30/09/2019 | 08.00 – 08.30 | Opening Meeting Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize audit plan | √ | √ | √ | √ |
| | 08.30 – 12.00 | Field visit to Hargy POM (RSPO P&C) PS: Workshop, chemical storage, water treatment, waste water treatment, schedule waste storage EP: FFB processing from receiving to dispatch YW: Clinic, interview with worker union, interview with gender committee, interview with workers | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Audit to Hargy POM (RSPO P&C) | √ | √ | √ | √ |
| Tuesday, 1/10/2019 | 08.00 – 12.00 | Field visit to Hargy Estate (RSPO P&C) PS: Boundary poles, workshop, chemical storage, fertilizer godown, fuel godown, schedule waste storage, landfill EP: Estate operation: harvesting/ fertilizer application/ spraying/ trunk injection/ EFB application; nursery YW: Clinic, housing, interview with worker union, interview with gender committee, interview with local government | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Audit to Hargy Estate (RSPO P&C) | √ | √ | √ | √ |
| Wednesday, 2/10/2019 | 08.00 – 12.00 | Field visit to Barema POM (RSPO P&C) PS: Workshop, chemical storage, water treatment, waste water treatment, schedule waste storage EP: FFB processing from receiving to dispatch YW: Clinic, interview with worker union, interview with gender committee, interview with workers/local villagers | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Audit to Barema POM (RSPO P&C) | √ | √ | √ | √ |
| Thursday, 3/10/2019 | 08.00 – 12.00 | RSPO SCCS for CPO Mills audit for Barema POM (RSPO P&C) | √ | - | - | - |
| | | RSPO SCCS audit for Barema KCP (RSPO SCCS) | - | √ | - | - |
| | | RSPO SCCS for CPO Mills audit for Hargy POM (RSPO P&C) | - | - | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | RSPO SCCS for CPO Mills audit for Barema POM (RSPO P&C) | √ | √ | √ | √ |
| | | RSPO SCCS audit for Barema KCP (RSPO SCCS) | | | | |
| RSPO SCCS for CPO Mills audit for Hargy POM (RSPO P&C) | | | | | | |
| 13.00 – 16.30 | Audit to HR and Finance | | | | | |
| Friday, 4/10/2019 | 08.00 – 12.00 | Field visit to smallholders (RSPO P&C) (2 sample smallholders for each auditors) | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Field visit to smallholders (RSPO P&C) (2 sample smallholders for each auditors) | √ | √ | √ | √ |
| Saturday, 5/10/2019 | 08.00 – 12.00 | Field visit to smallholders (RSPO P&C) (4 sample smallholders for each auditors) | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |

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|----------------------|---------------|---|----|----|----|----|
| Sunday, 6/10/2019 | | Break onsite | √ | √ | √ | √ |
| Monday, 7/10/2019 | 08.00 – 12.00 | Field visit to Pandi Estate (RSPO P&C) PS: Boundary poles, chemical storage, fertilizer godown, fuel godown, schedule waste storage, landfill EP: Estate operation: harvesting/ fertilizer application/ spraying/ trunk injection/ EFB application YW: Clinic, housing, interview with worker union, interview with gender committee, interview with previous land owners | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Audit to Pandi Estate (RSPO P&C) | √ | √ | √ | √ |
| Tuesday, 8/10/2019 | 08.00 – 12.00 | Field visit to Navo POM (RSPO P&C) PS: Workshop, chemical storage, water treatment, waste water treatment, schedule waste storage, landfill, EP: FFB processing from receiving to dispatch RSPO SCCS for CPO Mills audit for Navo POM (RSPO P&C) Interview to Stakeholders | √ | √ | - | - |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Continue audit for Navo POM (RSPO P&C) Interview to Stakeholders | √ | √ | - | - |
| | | | - | - | √ | √ |
| Wednesday, 9/10/2019 | 08.00 – 12.00 | Field visit to Navo Estate (RSPO P&C) PS: Boundary poles, workshop, chemical storage, fertilizer godown, fuel godown, schedule waste storage, landfill EP: Estate operation: harvesting/ fertilizer application/ spraying/ trunk injection/ EFB application, POME land application; nursery YW: Clinic, housing, interview with worker union, interview with gender committee, interview with previous landowners | √ | - | - | - |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Continue audit for Navo Estate (RSPO P&C) | √ | - | - | - |
| Thursday, 10/10/2019 | 08.00 – 12.00 | Field visit to smallholders (RSPO P&C) (4 sample smallholders for each auditors) | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Field visit to smallholders (RSPO P&C) (4 sample smallholders for each auditors) | √ | √ | √ | √ |
| Friday, 11/10/2019 | 08.00 – 12.00 | Field visit to smallholders(RSPO P&C) (4 sample smallholders for each auditors) | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 16.30 | Field visit to smallholders (RSPO P&C) (4 sample smallholders for each auditors) | √ | √ | √ | √ |
| Saturday, 12/10/2019 | 08.00 – 11.30 | RSPO SCCS audit for Hargy KCP (RSPO SCCS) Verification of outstanding information | √ | √ | - | - |
| | 11.30 – 12.00 | Report Preparation | √ | √ | √ | √ |
| | 12.00 – 13.00 | Break | √ | √ | √ | √ |
| | 13.00 – 14.00 | Closing Meeting | √ | √ | √ | √ |
| | | | | | | |
| Sunday, 13/10/2019 | | Return to Port Moresby | √ | √ | √ | |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

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

3.2 Time Bound Plan progress for multiple management units

| Time Bound Plan | | |
|--|--|------------|
| Requirement | Remarks | Compliance |
| Does the plan include all current subsidiaries, estates and mills? | Hargy Palm Oil Mill Limited is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies. | Yes |
| Have all the estates and mills certified within five years after obtaining RSPO membership? | No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014. | Yes |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available. | The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP. | Yes |
| Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting? | Yes, there is changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP. | Yes |
| Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised | No isolated lapse. SIPEF is able to demonstrate adequate evidence related to changes in implementation of the plan. | Yes |
| Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised | The delay of not able to certify all the estate within the 5 years period from the day of RSPO membership is accepted by the assessment team. | Yes |
| Have there been any stakeholder comments? | Yes. Stakeholder comments are noted. The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case | Yes |

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| | <p>Tracker; raised by the individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>On 18 June 2018 – Complaint Panel to deliver a decision.</p> <p>On 25 July 2018 – Complaint Panel to deliver a decision.</p> <p>On 23 August 2018 – Draft decision letter to be reformatted.</p> <p>On 19 September 2018 – Decision Letter – Complaints Panel.</p> <p>On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p> <p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p> <p>On 20 December 2018 – The complaint is officially closed.</p> <p>The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p> | |
| Un-Certified Units or Holdings | | |
| <p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. | <p>Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note "The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015".</p> | <p>Yes</p> |
| <p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p> | <p>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure.</p> | <p>Yes</p> |

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| <p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p> | <p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>On 18 June 2018 – Complaint Panel to deliver a decision.</p> <p>On 25 July 2018 – Complaint Panel to deliver a decision.</p> <p>On 23 August 2018 – Draft decision letter to be reformatted.</p> <p>On 19 September 2018 – Decision Letter – Complaints Panel.</p> <p>On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p> <p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p> <p>On 20 December 2018 – The complaint is officially closed.</p> <p>The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p> <p>RaCP tracke, per November 2019: MUs with potential liability: 3; LUCA submitted (MUs): 3; LUCA review ongoing (MUs): 0; LUCA review-clarification (MUs): 0; LUCAs review completed (MUs): 2; Concept Note (CN) required (MUs): 3; CN submitted (MUs): 2; CN approved (MUs): 2;</p> | <p>Yes</p> |
| <p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with</p> | <p>No labor dispute noted. The assessment team has conducted a search in internet to confirm that</p> | <p>Yes</p> |

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| RSPO P&C criterion 6.3. | there is no new comments or dispute raised by the communities on those units that have not been certified. | |
| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 | No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified. | Yes |
| Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available. | The internal audit has been conducted for all uncertified units: <ul style="list-style-type: none"> • PT. Agro Rawas Ulu was conducted on 20-21 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Kati Lama was conducted on 4-6 March 2019 assessing criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Muara Rupit was conducted on 18-20 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; Each company provide correction and corrective action on the base to ensure all RSPO P&C requirements are implemented. | Yes |

3.3 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|--|---|-------------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill’s initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | All of smallholders supplying FFB to Hargy Oil Palms Limited Palm Oil Mills are RSPO-certified. | Yes |

3.4 Details of findings

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

During the Certification Assessment there were 0 Major & 0 Minor nonconformities raised.

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

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| Summary of Total Number of Nonconformity | | | |
|---|------------|--|--|
| Nonconformity | | | |
| NCR Ref # | Nil | Clause & Category (Major / Minor) | |
| Date Issued | | Due Date | |
| Closed (Yes / No) | | Date of nonconformity Closure | |
| Statement of Nonconformity: | | | |
| Requirement Reference: | | | |
| Objective Evidence: | | | |
| Corrections: | | | |
| Root Cause Analysis: | | | |
| Corrective Actions: | | | |
| Assessment Conclusion: | | | |

| Opportunity for Improvements | |
|-------------------------------------|--|
| OFI # | Description |
| OFI 1 | 6.9 HOPL have procedure and mechanism to handle issues related to sexual harassment. Audit team have verified the resolution process. Consideration related to record of counselling/mediation process signed with both parties and witnesses if there is no request for anonymity. |

| Positive Findings | |
|--------------------------|---|
| PF # | Description |
| PF 1 | HOPL management are welcome and supportive to the research project surrounding Lake Hargy, such as mapping and pointing of GPS coordinates. |

3.4.1 Status of Nonconformities Previously Identified and Observations

| Non-Conformity | | | |
|------------------------------------|------------|--|--|
| NCR Ref # | Nil | Clause & Category (Major / Minor) | |
| Closed (Yes / No) | | Date of nonconformity Closure | |
| Statement of Nonconformity: | | | |
| Requirement Reference: | | | |
| Objective Evidence: | | | |

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|-------------------------------|--|
| Corrective Actions: | |
| Assessment Conclusion: | |

| Opportunity for Improvement | |
|-----------------------------|---|
| OFI# | Description |
| OFI 1 | <p>4.7.5 - The company has emergency procedures and instructions of fire emergency response, Mills are completed with Hydrant, Fire Extinguishers and records of training and emergency drill. However, during demonstration of fire emergency response, the first attempt the nozzle was jammed. Water, can only flow in second attempt after the nozzle being replaced.</p> <p>Action plan: Company demonstrated the nozzle for fire extinguisher and hydrants are function properly. Audit team made check and verification for hydrant points in all three palm oil mills and found all in good function.</p> |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|------------------------|--------------------------|---------------|-------------|-------------------------|
| 1037572M17 – RSPO SCCS | Major | D.3.2 | 28/03/2014 | 08/04/2014 (closed) |
| 1037572M18 – RSPO SCCS | Major | D.3.3 | 28/03/2014 | 08/04/2014 (closed) |
| 1037572N4 | Minor | 4.7.2 | 28/03/2014 | 06/03/2015 (closed) |
| 10375752N5 | Minor | 4.7.3 | 28/03/2014 | 06/03/2015 (closed) |
| 10375752N10 | Minor | 4.7.5 | 28/03/2014 | Escalated to Major NC |
| 10375752N9 | Minor | 5.3.2 | 28/03/2014 | 06/03/2015 (closed) |
| 10375752N13 | Minor | 5.6.2 | 28/03/2014 | 06/03/2015 (closed) |
| 10375752N15 | Minor | 6.5.3 | 28/03/2014 | 06/03/2015 (closed) |
| 1161437M1 | Major | 4.7.5 | 06/03/2015 | 04/05/2015 (closed) |
| 1161437M2 | Major | 5.6.1 | 06/03/2015 | 04/05/2015 (closed) |
| 1161437N1 | Minor | 4.8.2 | 06/03/2015 | 20/02/2016 (closed) |
| 1161437N2 | Minor | 5.2.4 | 06/03/2015 | 20/02/2016 (closed) |
| 1295340M1 | Major | 2.2.1 | 20/02/2016 | 20/04/2016 (closed) |
| 1295340M2 | Major | 4.7.3 | 20/02/2016 | 20/04/2016 (closed) |
| 1295340M3 | Major | 6.3.2 | 20/02/2016 | 20/04/2016 (closed) |
| 1295340M4 – RSPO SCCS | Major | D.4.1 | 20/02/2016 | 20/04/2016 (closed) |
| 1295340N1 | Minor | 4.1.2 | 20/02/2016 | 01/08/2017 (closed) |

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|------------------------------|-------|-------|------------|---------------------|
| 1295340N2 | Minor | 4.7.5 | 20/02/2016 | 01/08/2017 (closed) |
| 1664926-201807-M1 | Major | 6.5.2 | 10/08/2018 | 01/10/2018 (closed) |
| 1664926-201807-M2 | Major | 4.7.3 | 10/08/2018 | 01/10/2018 (closed) |
| 1664926-201807-M3- RSPO SCCS | Major | 5.5 | 10/08/2018 | 01/10/2018 (closed) |
| 1664926-201807-M4- RSPO SCCS | Major | 5.11 | 10/08/2018 | 01/10/2018 (closed) |

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Hargy Oil Palms Limited Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

| List of Stakeholders Contacted | |
|---|--|
| <p>Internal Stakeholders</p> <ul style="list-style-type: none"> - Workers in Hargy Estate, Navo Estate and Pandi Estate - Workers in Hargy POM, Barema POM and Navo POM - Smallholders (sampled) - Compound Security Coordinator of Sabalbala Compound - Constructor Supervisor at Sabalbala Compound - Senior Welfare Officer | <p>Union/Contractors/Local Communities</p> <ul style="list-style-type: none"> - West New Britain Oil Palm Workers Union - Apupul Committee Leader - Women Representative of Apupul Village - Suspended Smallholders |
| <p>Government Departments</p> <ul style="list-style-type: none"> - Bialla Health Care - Ward Member of Noau Village | <p>NGO</p> <ul style="list-style-type: none"> - United Nation Development Program (UNDP) of West New Britain Province – Lake Hargy Project |

| IS # | Description |
|-------------|--|
| | <p>Feedbacks:</p> <p>Secretary of West New Britain Oil Palm Workers Union</p> <ul style="list-style-type: none"> - Last meeting between HOPL management and Workers Union was on 20 December 2018, during 2019 there is no meeting held due to difficulty of permission by HOPL management. - Workers Union advice that prior terminating an employee, it is better to discuss with union. |
| | <p>Management Responses:</p> |

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| | <p>Darren Stott – General Manager (HR, Wellbeing and Development). HOPL HR Management has maintained an open relationship with the union. It is not however the responsibility of HOPL to request or arrange regular meetings with the union. As documented in the minutes HR Management has expressed their willingness to cooperate with any union activities that they wish to hold, providing advance notice is given. Likewise, all requests for meetings with HR Management from the union have been granted previously. At no stage in 2019 has the Union Secretary contacted anyone in HR Management for a meeting. At one point the current HOPL Union rep. invited the HR Operations Manager to visit the union office at Barema however to date, this has not transpired due to the Union Secretary not being available and/or contactable. There is no requirement under PNG Law to contact the union prior to terminating an employee. Anyone of the 78 HOPL union members can at anytime lodge a grievance to the Union and HOPL will respond in accordingly.</p> |
| | <p>Audit Team Findings: Audit team accepts the explanation from organization.</p> |
| IS # | Description |
| | <p>Feedbacks: Representative of UNDP-West New Britain Province</p> <ul style="list-style-type: none"> - UNDP has no project or program with HOPL. Concern of UNDP project is Community-Based Forest Areas Conservation surrounding Lake Hargy. - HOPL management are welcome and supportive whenever UNDP request to conduct an identification of landowner surrounding Lake Hargy, such as mapping and pointing of GPS coordinates. <p>Management Responses: Grahame Coleman - General Manager Community Affairs: HOPL has in the past provided logistical support, location venues for stakeholders and UNDP to have meetings and our own GIS officers (FIC) to assist plotting coordinates. All mapping coordinates were given to UNDP to compile into their draft summary and taken to POM. HOPL will further facilitate assistance with detailed GIS mapping upon written requests from the UNDP. Alfred Talania – Community Engagement Manager: It is always in the best interest of the surrounding communities and the people of Baikakea village to conserve Hargy Lake. The program commenced in 2012 via an MoU with UNDP and the West New Britain Provincial Government. HOPL through the CA department were consulted and approached by the landowners of Baikakea to assist them in their aspiration to conserve the lake which was threatened from the Buluta Oil Palm Estate (Ben Irima, a local from Gomu village) which holds Title to Portion 2081. (Refer photo showing the caldera). There have been plans by Ben Irima to have the area logged and HOPL strongly objects to have the area logged and developed for Oil Palm given the pristine forest and the rugged Terrain. HOPL assisted the group of Baikakea and had their Association incorporated on the 13th of February 2018 under the name “Lamo Auru Community Conservation Association”. The association with the support from UNDP, WBNP Government and HOPL is ambitious to promote the area into an Eco Tourism spot. The Department of Conservation and Environment Protection Authority (CEPA) are now moving towards gazettal of the area a fully Nationally Protected Area. Recently, the UNDP also requested assistance from HOPL with demarcation of the area which the GIS team had to traverse with the locals and the UNDP around the vicinity of the area planned for conservation.</p> <p>Audit Team Findings: Audit team noted as positive comment.</p> |
| IS # | Description |
| | <p>Feedbacks: Ward Member of Noau Village</p> <ul style="list-style-type: none"> - No regular program from HOPL to Noau village, therefore less contribution to local community development. - Smallholder frequently asking why the FFB price is getting lower, and transport deduction was high. There was no explanation from HOPL to smallholders related to the questions. |

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| | <p>Management Responses: Grahame Coleman - General Manager Community Affairs: We have our small holder’s extension Team and Community engagement Team that facilitates awareness trainings and post projects not only to Noau but also Kol, Mengens, Ulamona and Bialla village communities. From early January 2019 to current no programs have been facilitated due to numerous natural disasters which has severely affected HOPL’s operations including and not limited to two flooding events and three Mt. Ulawun eruption events. Alfred Talania – Community Engagement Manager: HOPL engagement programs around the Noau area is based on Field Days with the growers and especially the VOP growers. Apart from these are the support from the Lands Team in the acquisition of Land Titles for the major Plantations like the Abulmosi, Magalona and Alaba Development Company. Much consultation has been undertaken with the leaders of villages on the management of the ILG affairs into sustainable business vehicles for the villages. Steven Patiken – Heads of Smallholder Operations: No complaint or grievance has been forthcoming or received in relation to transport costs and this was also not brought up by BOGA growers association (Mr. Oka Kamale) as per the recent Local Planning Committee (LPC) meeting held this week on Tuesday 8 October 2019.</p> <p>Audit Team Findings: Audit team noted the inquiry from stakeholder and verified with Certificate Holder. The information included as part of indicator 6.10.</p> |
| IS # | Description |
| | <p>Feedbacks: Women Representative of Apupul Village</p> <ul style="list-style-type: none"> - HOPL has contribution to church activities. The company support material and person to attend the church event. - HOPL officer always attend to community meeting at village to giving awareness. - Communities need detailed explanation related to water quality in the small creeks that passes through the village, because the community knows that company activities such as fertilizer and herbicide use are carried out upstream. - Communities need clarification related drainage system at Area-8, because when rainy season the run off directly flows through the village and breaks the garden. - During rainy season, certain VOP Smallholders Block has a problem that the FFB cannot move out from the block because to road is broken. <p>Management Responses: Ian Winstanley – Chief Executive Officer: HOPL will respond to the Women Representative of Apupul Village in relation to their concerns regarding the drainage system from Area 8. Hargy Oil Palms Limited is committed to reducing the effect of any environmental damage to external stakeholders. As an ongoing part of this commitment we are improving the current replant standards to plant across the slope, incorporate new plantings on contour planting lines, repair existing and construct new terraces, reduce the velocity of any run off rain water events by mitigating this as early as possible up slope, installation of water bars across the roads and slit pits. All these assist to reduce the possible damaging effects of uncontrolled rain water which can damage palms, bridges, existing roads and other infrastructure. However due to heavy rain and the hard surfaces with the Area 8 compound including roofed area without a water tank attached we acknowledge at time there will be excess rain water and we will mitigate the effects as best possible. Grahame Coleman - General Manager Community Affairs: Block holders have to report road damaged condition directly to Smallholders Department who will identify the block ID then submit a requisition for Road Fleet to repair damaged roads on assessment. Note that after rain damage affects roads it is not advisable to immediately repair the road unless the road is thoroughly dry (3 – 4 days longer depending on frequency of rain) to prevent further damaging road. Due</p> |

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| | to the unprecedented rainfall we have had in 2019 and a blowout in Road Fleet budget it is acknowledged some roads have not been repaired in a timely manner. |
| | Audit Team Findings: Audit team have verified the information. No further action. |
| IS # | Description |
| | Feedbacks: Bialla Health Care - HOPL is very support to assist Health Care, such as painting, incinerator, cutting grass, doctor, ambulance, etc. - HOPL also build two unit of house for health care staff. - HOPL also help to make awareness of Tuberculosis and HIV program. |
| | Management Responses: Darren Stott – General Manager (HR, Wellbeing and Development): Yes HOPL has assisted Bialla Health Centre as required despite this being a Provincial Government responsibility. |
| | Audit Team Findings: Audit team takes the stakeholder comment as positive input. |
| IS # | Description |
| | Feedbacks: Bialla Oil Palm Grower Association (BOGA) - BOGA has 3,800 growers as a member. The purpose of the organisation is monitor the oil palm company related to requirements met with OPIC and regulation requirements. - BOGA has frequently meeting (quarterly) with OPIC, LLG and HOPL to discuss relevant issues. - BOGA received some complaints from its member related to transport deduction which too high. |
| | Management Responses: Steven Patiken – Heads of Smallholder Operations: No complaint or grievance has been forthcoming or received in relation to transport costs and this was also not brought up by BOGA growers association (Mr. Oka Kamale) as per the recent Local Planning Committee (LPC) meeting held this week on Tuesday 8 October 2019. |
| | Audit Team Findings: Audit team noted the stakeholder comment and included as part of indicator 6.10. No further action. |
| IS # | Description |
| | Feedbacks: Nine of Suspended Smallholders - Suspended smallholders only wants to know the reason of suspension from HOPL management. Until now, they were not informed at all. - Suspended smallholders request to HOPL to develop communication and provide sharing session to resolve the issues. - Currently the suspended block is trying to obtain land title to the lands office, with high cost. In the mean time, their source of money comes from oil palm. However, HOPL does not received their FFB. |
| | Management Responses: Grahame Coleman - General Manager Community Affairs: The five said Blocks given documented suspension notices between August 2016 – April 2018. <ul style="list-style-type: none"> • Block No.03-1470 illegal occupation (John Wapa) hand delivered February 6th 2018 • Block No.03-1471 illegal occupation (Wendy Yuku) hand delivered February 6th 2018 • Block No.03-1472 illegal occupation (Waimal Kepo) hand delivered February 6th 2018 • Block No.03- 1473 No submitted docs for proof of ownership hand delivered Aug 18th 2016 • Block No.03- 1473 as above and crop diversion reminder of suspension notice January 3rd 2017 • Block No.03-1474 No documentations for proof of ownership (Michael Tovuvul also Vuvul) hand delivered February 6th 2018 & April 11th 2018. |

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| <p>Steven Patiken – Heads of Smallholder Operations: Blocks No.1470, 1471,1472,1473 & 1474 located in Barema; Blocks No.1201, 1110 Ewase blocks were in 2017</p> <p>Audit Team Findings: Audit team noted the information from stakeholder and verified the information from Certificate Holder and smallholders as part of RSPO Supply Chain audit. Audit team have verified the documentary evidence. Audit team in view the steps taken to uphold procedure for supply chain integrity. However, audit team have communicated to Certificate Holder (Community Affairs Dept.) and smallholder to discuss action plan for solution.</p> |
|--|

| List of land owner / user contacted | | | | | |
|--|--|----------------|----------------------|---------------------------------|--|
| Name | Years of ownership / used | Land area (ha) | Agreement (Yes / No) | Agreement base on FPIC (Yes/No) | Compliance on the agreement terms and conditions |
| - Representative of Urumaili Village (Land Owner) | Incorporated Land Group (Lease – Lease Back) | 276 Ha | Yes | Yes | Agreement with consent from the lease-lease back program are available. |
| - Ewasse Land Owner Association/ELOA (Land owners) | Incorporated Land Group (Lease – Lease Back) | 170 Ha | Yes | Yes | Agreement with consent from the lease-lease back program are available. In progress to comply further. |



| Previous land owner / user comment | |
|------------------------------------|--|
| #1 | <p>Feedbacks: Mr. John Gaa – Previous Land Owner from Urumaili Village</p> <ul style="list-style-type: none"> - At Area-13, there is a customary land that developed by HOPL. However, only 3 Ha that will be compensated and even than the compensation value was not worthy (only PGK6,000). Then, until now there is no progress with this issue. - Piece of land under Block 2067 (near Bialla Secondary School), 15 Ha of land has developed and planted with oil palm by customary people and LLG. However, in 2015 HOPL obtain land title from the government for its area and all Area-7. Previous land owner request to HOPL for release back that area to LLG and deducted from HOPL land title. Also, there was no clear compensation made by HOPL for its area. - There is 87.5 Ha of LLB land at Area-6 and Area-7 (side along the main road to Guest House complex). The community request that area should be rented for certain time with an agreement, not only 10% benefit from FFB's <p>Management Responses: Alfred Talania – Community Engagement Manager: 1. Revaluation and assessment of the Area 13 claim saw HOPL reach an understanding to have the area compensated for PGK15,212.00 comprising of the following break-ups (a. Royalty back Payment, Land Rent for 2 Ha for 19 years and compensation for 252 Oil Palm Trees. This payment amount is justifiable compared to their claim to have HOPL compensate the area for PGK208,330. A response is still yet to be received by the Urumaili ILG executives to HOPL's letter dated 23 September 2019. Robert Ga'a was in receipt of the letter on the 8 October 19. (Copy acknowledgement letter forwarded to Godwin Aiwana by Graham Coleman).</p> |

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| | <p>2. There is no agreement reached by HOPL to release 15 Ha of land to the ILG. Harvesting has also ceased by HOPL on that area claimed by the LLG since there is no proper Land Title or documents from the LLG.</p> <p>3. Subject Area has been acquired by HOPL who has Title to Portion 2044 and part of the area was given back to the Urumaili Development Corporation. HOPL similar to other LLB arrangements with Lanco groups is paying a standard Royalty percentage of 10% to all and this includes the UDC. A MOU between HOPL and Urumaili Land Group (UDC) on the 17th April 2012. (Refer copy of MOU).</p> <p>Godwin Aiawa – Company Secretary/Lawyer: Area 13 overplanted land area Hargy Oil Palms Limited has been in constant negotiations with executives of Urumaili Incorporated Land Group with regard to compensation in terms of FFB royalty and land rental. The initial compensation sum of PGK6,760.93 has been increased to PGK15,212.00, which is in line with the national government’s standard valuation rates as contrary to the sum of PGK208,330.00 claimed by Urumaili Incorporated Land Group.</p> <p>The monies were supposed to have been paid out back in 2009, however due to infightings amongst the landowners as to ownership of overplanted land area unfortunately caused the long delay in settling this matter. At this stage, the Urumaili ILG is not registered and fully recognised at law to claim ownership over this disputed land area, therefore situation remains unresolved until such time they are comply with the law by ensuring the ILG is registered and complies with the law.</p> <p>Audit Team Findings: Audit team noted the information from the previous landowner and incorporated into Criterion 2.3 and 6.4. Audit team noted the explanation from Hargy Oil Palms and incorporated into Criterion 2.3 and 6.4. It was evident and verified that the negotiation was in progress, follow up and verification on subsequent assessment visit.</p> |
| <p>#2</p> | <p>Feedbacks: Ewasse Land Owner Association (ELOA)</p> <ul style="list-style-type: none"> - In 2003-2004 there is a complaint related to effluent disposed to the sea. Therefore, in 2017 HOPL make an agreement with communities as follow up to resolve the issue. Within its agreement, there were four points of community request, such as providing of scholarship program for the children; rehabilitation of land and sea (particular on coral reefs); new business opportunities; and employment. However, until today no information provided by the company related to the progress of the agreement. - In July 2019, ELOA submit complaint to HOPL related relocation of effluent discharge. However, there is no feedback until now. <p>Management Responses: Godwin Aiawa – Company Secretary/Lawyer. On the 7 November 2016, both representatives of Ewasse Landowners Association and Hargy Oil Palms Limited signed a Mediated Agreement to end the long legal battle over allegations of environmental pollution to surrounding coastal areas and the sea. Under this Mediated Agreement, both parties have agreed to the following:</p> <ol style="list-style-type: none"> 1. Setup of plan to monitor and conserve foreshore and onshore reefs. Between 2017 and 2018, HOPL engaged the services of an environmental NGO (Mahonia Na Dari) to carry out feasibility studies. This program could not continue further despite initial success mainly due to differences encountered within the appointment and removal of ELOA office bearers. So far this issue is yet to be resolved by the landowners; 2. HOPL produced a draft MOU and delivered to ELOA representatives for their feedback in early 2017 on how to manage the LMMA plan but again due to infighting amongst the executives of ELOA, no progress has since been made; 3. Business Spinoff benefits. |

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| | <p>HOPL continues to give priority to ELOA through awarding of contract works to landowners based on their capability to undertake tasks required of them. It is the responsibility of ELOA to screen and recommend list of suitable contractors to HOPL to be engaged;</p> <p>4. Employment of Ewasse landowners. HOPL continues to engage landowners in various employment capacities. The recruitment of landowners as full time employees is standard and given first preference over others, however they must meet basic educational qualifications in order to be considered for the job;</p> <p>5. Scholarships. Scholarships are only granted to children of landowners who are eligible to enter tertiary and higher learning institutions in the field of engineering and agriculture streams. This is the responsibility of the ELOA executives to screen suitable candidates and submit names to HOPL for consideration. ELOA has not undertaken this activity since 2017;</p> <p>6. Water Supply established at Ewasse Village HOPL built and installed water supply at its own cost to service Ewasse village in early 2018. ELOA was task to take responsibility in ensuring this service is maintained at all times. So far, members of the village community vandalised the water pumps which then resulted in the water supply becoming ineffective, however it is now the responsibility of ELOA to ensure water supply becomes functional once again; &</p> <p>7. Complaints relating to relocation of effluent discharge has been dealt with by the Environment and Sustainability Department and so there really is no issue of grave concern simply because HOPL continues to honour and comply with the terms of the Mediated Agreement.</p> <p>In summary, HOPL has been proactive to deliver agreement. In fact, it is the ELOA that should be proactive to engaging with HOPL in fulfilling the terms and conditions as set out under the Mediated Agreement</p> |
| | <p>Audit Team Findings: Audit team have verified the information and included as part of indicator 6.3.</p> |

3.6 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

| Formal Signing-off of Assessment Conclusion and Recommendation | |
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| <p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Hargy Oil Palms Limited has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Hargy Oil Palms Limited is continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Pratama A Sedayu | Name: Ian Winstanley |
| Company Name: on behalf of BSI Services Malaysia Sdn Bhd | Company Name: Hargy Oil Palms Limited |
| Title: Lead Auditor | Title: Chief Executive Officer |
| Signature:  | Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  |
| Date: 12 October 2019 | Date: 12 October 2019 |

Appendix A: Summary of Findings *include the appropriate checklist used for assessment*

| Criterion / Indicator | Assessment Findings | Compliance | |
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| 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 - | HOPL maintained a stakeholders list for the entire operations of HOPL that is including Hargy POM, Navo POM, Barema POM, Pandi Estate, Hargy Estate and Navo Estate. The latest stakeholder list was dated 29 July 2019. The changes include contact person. The SOP for Dissemination of Company Information & Documents No.PRO-ESD-SUS-002-03 dated 26 July 2019 states that site manager is responsible to forward any request for information or documents to the Compliance Department for perusal and recommendation. Sustainability Officer – Legal Compliance and SCCS for reviewing request for information and giving advice on whether disseminate or not. General Manager – Compliance Department liaise with the Chief Executive Officer to authorise dissemination of information of documents that are confidential in nature. CEO is responsible for authorization of company documents for dissemination to persons outside the company such as stakeholders. For external stakeholders, the List of Publicly Available Documents (REG-ESD-SUS-001-12) dated 18 June 2019 is available to inform about the information that can be obtain from HOPL. Interviews conducted with local stakeholder confirmed that they are aware on their rights for information. List of publicly available documents are available in Hargy Estate, Pandi Estate, Navo Estate, Hargy POM, Barema POM and Navo POM. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | The Community Affairs office is responsible to disseminate the information to smallholders and community surrounding the HOPL operations through Field Day. | |
| 1.1.2 | Records of requests for information and responses shall be maintained. - Major compliance - | <p>The request for information is captured both centralized at Communities Affairs Office, Compliance Department and each Operating units. Information request sample verified:</p> <ul style="list-style-type: none"> - Register to Request for Information Responses last updated 12 April 2019 from Compliance Department. There is request from Deloitte Tiuche Tohmatsu, dated 3 February 2018; information request related to List of PNG applicable legislation; Purpose for financial auditing; Responsible staff is the Sustainability Officer; Response status submitted document; Dated 3 February 2018; Status closed. <p>In Hargy POM; request from Outreach Congregation, United Church of Papua New Guinea – to Hargy POM dated 22 July 2019. Approved request for fabricated barbeque stand on same date.</p> <p>In Hargy Estate the Register to Request for Information Responses last updated 14 September 2019. Request from Matilliu united Church Ewasse Circuit, to Hargy Estate, dated 9 September 2019. The request related to provision of grass slasher for football field. The request approved on same date and grass slashing on 14 September 2019; Status closed.</p> <p>In Barema POM; On 12 April 2019, Barema 2 Elementary school is requesting transport from Barema POM. The purpose is for transporting timber for new school location. The request approved on 13 April 2019. Evidence shown vehicle logbook Truck No.L116 dated 14 April 2019, Truck No.L116 pick up and dropped off timber for new school location.</p> <p>Pandi Estate have prepared the form form information request, however there was no information request to Pandi Estate in 2019.</p> | Yes |
| Criterion 1.2 | | | |

| Criterion / Indicator | Assessment Findings | Compliance | |
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| <p>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.</p> | | | |
| <p>1.2.1</p> | <p>Publicly available documents shall include, but are not necessarily limited to [Major]:</p> <ul style="list-style-type: none"> • Evidence of the right to use the land/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>The list of document that is available for the public is documented in the List of Publicly Available Documents (REG-ESD-SUS-001-11) dated 18 June 2019. The list is make publicly available at the notice board within the vicinity of HOPL operation. The list of document that is made available to public including:</p> <ul style="list-style-type: none"> - Environment Policy - OH&S Policy - OH&S Plan (on request) - Drugs & Alcohol Policy - Policy on Human Rights - Policy Against Forced or Trafficked labour - Sexual Harassment Policy - Grievance Policy - Policy on Child Labour - Responsible Plantations Policy - Smoke-Free Workplace Policy - Policy Concerning Ethical Conduct - Policy on Protection of Reproductive Rights - Communication Policy - Equal Employment Opportunity Policy - Family Violence Policy - SEIA and Environmental Aspects & Impacts Register (on request) - Details of complaints and grievances (on request and approved by CEO) - Land Acquisition procedures & Negotiation procedures (on request and approved by CEO) - Land Titles/User Rights records (on request and approved by CEO) - Continuous Improvement Plan (on request and approved by CEO) - HCV Documentation (on request and approved by CEO) - Public Summary of Certification Assessment Report (on request and approved by CEO) | <p>Yes</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>- Pollution Prevention and Reduction Plan (on request and approved by CEO)</p> <p>The policies are published on notice boards within the HOPL operating sites, the Hargy website (www.hargy.com.pg), and Employee Handbook.</p> <p>List of Publicly Available Documents available in Hargy Estate, Navo Estate, Pandi Estate, Hargy POM, Barema POM and Navo POM.</p> | |
| | <p>Associated Smallholder Requirement:</p> <p>Oil Palm Industry Corporation (OPIC) to hold relevant documents and make available to interested parties on request.</p> | <p>Smallholder of Hargy Oil Palms Limited did not receive inquiry and or provide response to stakeholders. However they understand that all information request/inquiry directed to OPIC and Hargy Oil Palms Limited.</p> | Yes |
| <p>Criterion 1.3</p> <p>Growers and millers commit to ethical conduct in all business operations and transactions.</p> | | | |
| 1.3.1 | <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>The Policy Concerning Ethical Conduct (POL-HRD-GEN-003-03) dated 7 June 2019 has been established and communicate to stakeholders via the the Hargy website and notice boards within the HOPL operating sites. The policy emphasized on no illegal gratification and corrupt practices (solicitation and/or acceptance of corrupt payments, making corrupt payments, commission, using company resources), and receiving/giving gifts. HOPL imposed internal audits to controls, prevent and detect any corrupt practices. It does this through whistleblower process.</p> <p>There were no grievances recorded on matter related to business ethical conduct of HOPL.</p> <p>In order to ensure HOPL is dealing with appropriated contractors, the controlled applied is a Tri-verification mechanism. Any contract that is proposed by the proposer will approved by the Head of Department and later verified by the Legal Department and Finance Department to ensure that the company has met the country legal requirements. In the contracts,</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|------------|
| | <p>the HOPL Environmental, OHS and other polices are introduced to the contractors.</p> <p>Sample of code of conduct policy:</p> <ul style="list-style-type: none"> - Hargy POM made dissemination of code of conduct policy dated 21 May 2019 for 23 employees; including tradesman electrician, electrician, driver, mechanic, trainee welder, field & project supervisor, storewoman. - Hargy Estate made dissemination of code of conduct policy dated 30 April 2019 for 21 employees. This round includes harvester and overseer. <p>In Barema POM, the Awareness on Ethical Conduct, dated 16 June 2019 in Barema POM for 26 employees; comprise of electrical, process, maintenance welder, maintenance attendance, biogas laboratory analyst.</p> <p>In Pandi Estate the Awareness on Ethical Conduct Policy, dated 13 June 2019, explaining honest in our dealing, no conflict of interest, selling goods in company compounds is not allowed, no corrupt payments, employees should not falsify their timesheets, bunch or bag numbers. The awareness session was attended by 65 workers, comprise of: harvesters, wheelers, loose fruit collectors, sprayers, drivers, carpenters, fertilizer applicators, housewives.</p> <p>In Navo POM, the Ethical Code of Conduct Policy have been disseminated on 27 January 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> | |
| <p>Associated Smallholder Requirements:</p> <p>Oil Palm Industry Corporation (OPIC) required to have a written policy committing to a code of ethical conduct and integrity in all operations and transactions.</p> | <p>The associated smallholder interviewed can explain the ethical code implemented by honest FFB harvested and recorded. No cheating in FFB weighing. No crop diversion.</p> | <p>Yes</p> |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|------------|
| Principle 2: Compliance with applicable laws and regulations | | |
| Criterion 2.1 There is compliance with all applicable local, national and ratified international laws and regulations. | | |
| 2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance - | <p>The Legal Department Head is responsible to track the changes of the regulations. Through interview, it was confirmed to the assessment team that he tracks the changes on the laws using the Pacific Islands Legal Information Institute (PaclII) website.</p> <p>In Hargy POM; the Environment Permit to Hargy Oil Palms Limited, dated 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053. The permit to accy works at Ibane Oil Palm Plantation and Navo Palm Oil Mill within Portion 624, Bialla, West New Britain Province.</p> <p>"Certificate of Registration as a Factory – Mill Processing Plant No.8878 for Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8879 – Power House for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8880 – Water Treatment Plant for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8883 – Mill Maintenance Workshop for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration of a Boiler Pressure Vessel No.10772, Registered No.B.1895 for PT. Atmino Bidrum WT Boiler-1 in Boiler Room in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <p>"Certificate of Registration of a Boiler Pressure Vessel No.10762, Registered No.PV.2675 for back Pressure Vessel in Power House in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> <p>"Certificate of Inspection of a Boiler Pressure Vessel No.9100, Certified No.PV.2122 for Pressure Vessel in Plantation Estate, address Hargy Oil Palms Limited, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> <p>"Certificate of Inspection of a Boiler Pressure Vessel No.9113, Certified No.PV.3133 for Pressure Vessel in Boiler Room, address Hargy Oil Palms Limited-Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> <p>"Certificate of Inspection of a Boiler Pressure Vessel No.9159, Certified No.PV.2852 for Pressure Vessel in Power House, address Hargy Oil Palms Limited-Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> <p>In Barema POM, the list comprise of: "Certificate of Registration as a Factory – Mill Processing Plant No.8840 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8851 – Sterilising Plant for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8847 – Power House for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8846 – Biogas Plant for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration of a Boiler Pressure Vessel No.10721, Registered No.PV.1334 for Sterilizer-1 in Hargy Oil Palms Limited Barema</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> <p>In Navo POM, the list of legal compliance comprise of: Environment Permit to Hargy Oil Palms Limited, dated 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053. The permit to accy works at Ibanea Oil Palm Plantation and Navo Palm Oil Mill within Portion 624, Bialla, West New Britain Province.</p> <p>"Certificate of Registration as a Factory – Mill Processing Plant No.8840 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8841 – Boiler/Power House for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8843 – Water Treatment Plant for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory No.8844 – Mill Maintenance Workshop for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration of a Boiler Pressure Vessel No.10718, Registered No.PV.2131 for Kernel Mill in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> <p>"Certificate of Inspection of a Boiler Pressure Vessel No.9107, Certified No.PV.2127 for Pressure Vessel in Powerhouse, address Hargy Oil Palms Limited-Navo Mill on, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> <p>"Certificate of Inspection of a Boiler Pressure Vessel No.9110, Certified No.PV.2130 for Pressure Vessel in Water Treatment Plant, address Hargy Oil Palms Limited-Navo Mill on, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <p>"Certificate of Inspection of a Boiler Pressure Vessel No.9112, Certified No.B.3132 for Boiler in Boiler Room, address Hargy Oil Palms Limited-Navo Mill on, based on Industrial Safety, Health and Welfare Act 1961", dated 28 February 2019 until 28 February 2020.</p> <p>"Licence to Keep Store Where Inflammable Liquids And/or Dangerous Goods May Be Kept No.8446 for 55,000 liters Diesel Tank in Vehicle Workshop-Navo" dated 28 February 2019. Hargy Oil Palms Limited paid PGK250.</p> <p>"Licence to Keep Store Where Inflammable Liquids And/or Dangerous Goods May Be Kept No.8443 for LPG/industrial gas storage in Warehouse-Navo" dated 28 February 2019. Hargy Oil Palms Limited paid K500.</p> <p>"Licence to Keep Store Where Inflammable Liquids And/or Dangerous Goods May Be Kept No.8447 for 22,000 liters diesel tank in Mill-Navo" dated 28 February 2019. Hargy Oil Palms Limited paid PGK250.</p> <p>PNG Driver Licence No.43099 class 7 name Mesulam Kanai, expiry date 21 April 2021. PNG Driver Licence No.43065 class 7 name Gordon Bongol, expiry date 21 April 2021. PNG Driver Licence No.62678 class 7 name Ilai Lawrence, expiry date 21 April 2021.</p> <p>In Navo Estate, the list of legal compliance consist of: "Certificate of Registration as a Factory – Chemical Shed No.8833 for Hargy Oil Palms Limited Navo Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019. "Certificate of Registration as a Factory – Wood Planning Workshop No.8820 for Hargy Oil Palms Limited Navo Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019. "Certificate of Registration as a Factory – Small Engine Workshop No.8837 for Hargy Oil Palms Limited Navo Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| | <p>In Pandi Estate, the list of legal compliance consist of: "Certificate of Registration as a Factory – Fertilizer Storage No.8821 for Hargy Oil Palms Limited Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory – Chemical Mixing Bay No.8820 for Hargy Oil Palms Limited Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> <p>"Certificate of Registration as a Factory – Vehicle Maintenance No.8814 for Hargy Oil Palms Limited Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2019.</p> | |
| <p>Associated Smallholder Requirement: Associated smallholders are to comply with all applicable PNG legal requirements.</p> | <p>Based on interview with associated smallholder, they understand that they have to comply with PNG legal requirements. For example, for land owners sitting on state land/Land Settlement Scheme – LSS they have to pay for land rental fee to the government.</p> <p>311790 Laurence Kitinauru: Agricultural Lease Under Section 49 No.19366/1790 for 6.78 Ha, under name Lawrence Kitinauru, dated 16 April 1992 and valid for 99 years. Location portion 1790, Milinch Ulawun, Fourmil Talasea, West New Britain Province. Based on Survey Plan Catalogue 15/606 dated 22 August 1989. The oil palm planting: 1991 (2 Ha); 1992 (2 Ha); 2007 (2 Ha). Laurence paid the tax for land of PGK80.</p> <p>311784 George Linge: Letter from West New Britain Provincial Administration – Division of Lands and Physical Planning Office of the Advisor, to Manager of Land Informatoin Section Department of Lands & Physical Planning, Boroko – NCD dated 16 August 2016. The letter related to application to get copies of LAF and LG over Portion 1784, Milinch Ulawun, Fourmil Talasea because Mr. George Dakoa has since passed away and his son George Linge following the title.</p> | <p>Yes</p> |

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|-----------------------|--|------------|
| | <p>Sighted Survey Plan for Portion 1773-1805 Catalogue No.15/606, dated 22 August 1984 – Portion 1784 allocated 7.2 Ha. Paid the LSS Lease Rental Fee of PGK150 every year.</p> <p>021088 – Sira Doang: Survey portion 1088 for 6.50 Ha dated 17 September 1981; pays land rental PGK24.50 per annum; Milinich of Ulawun Fourmil of Talasea; File No. 79-1362 Plan used 15/380.</p> <p>021066 – Mitiro Salabung: Survey portion 1066 for 7.85 Ha dated 14 November 1979; Milinich of Ulawun Fourmil of Talasea; File No. 78-1098 Plan used 15/380.</p> <p>021107 – Naunigi Tugute: Survey portion 1107 for 7.80 Ha dated 23 August 1988; pays land rental PGK40.00 per annum; Milinch of Ulawun, Fourmil of Talasea; File No. 78/1416 Plan used 15/381.</p> <p>021188 – Busol Guambuli/Max Buson: Survey portion 1188 for 6.58 Ha dated 23 August 1988; Milinch of Ulawun, Fourmil of Talasea; File No. 78/1201 Plan used 15/385. Pays land rental PGK32.50 per annum;</p> <p>040767 – Andrew Lalou (LSS) has an Agricultural Lease Under Section 56, State Lease Volume 81 Folio 249. For Portion 767 Sale Malasi, Milinich of Banga, Fourmil Talasea, Area 14.28 ha. File No.79/2345; Plan used 15/296. Period: 99 years from 17/01/1984. Annual rent PGK63.50.</p> <p>040748 – Susan Daipo (LSS) has an Agricultural Lease Under Section 56, State Lease Volume 79 Folio 231. For Portion 748, Milinich of Banga, Fourmil Talasea, Area 7.96 Ha. File No.79/1447; Plan used 15/294. Period: 99 years from 17 October 1983. Transfer to Rodney Daipo of Bialla, dated 1 July 2010. Annual rent PGK35.00.</p> <p>040610 – John Tabari (LSS) has an Agricultural Lease Under Section 56, State Lease. For Portion 610, Milinich of Banga, Fourmil Talasea, Area</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | 10.21 Ha. File No.86/1569; Ref. Plan 15/185. Period: 99 years from 13 October 1986. Annual rent PGK78.75. | |
| 2.1.2 | A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance - | The list of regulations required by HOPL operations is in place and it is managed as per the Procedure Compliance Obligation (PRO-ESD-EMS-002-09) dated 29 April 2016. The ESD is responsible to complete the compliance assessment on the regulation where by the tracking for any updates of regulation is conducted by the Legal Officer together with the Head of Departments. In Hargy POM, the Independent Consumer Competition Commission – Certificate of Inspection No.ICCC1701 for weighbridge JAC 320 NUWEIGH, dated 21 Jul 2019, valid for 21 July 2020. In Hargy Estate, the unit holds 2.1 List of PNG Applicable Legislations, consist of 115 legislations and 4 PNG Environmental Code of Practices. | Yes |
| | Associated Smallholder Requirement: Does not apply to individual associated Smallholders however OPIC to provide information as part of their extension activities. | Based on interview with associated smallholder, they understand that they have to comply with PNG legal requirements. For example, for land owners sitting on state land/Land Settlement Scheme – LSS they have to pay for land rental fee to the government. 311790 Laurence Kitinauru: Agricultural Lease Under Section 49 No.19366/1790 for 6.78 Ha, under name Lawrence Kitinauru, dated 16 April 1992 and valid for 99 years. Location portion 1790, Milinch Ulawun, Fourmil Talasea, West New Britain Province. Based on Survey Plan Catalogue 15/606 dated 22 August 1989. The oil palm planting: 1991 (2 Ha); 1992 (2 Ha); 2007 (2 Ha). Laurence paid the tax for land of PGK80. 311784 George Linge: Letter from West New Britain Provincial Administration – Division of Lands and Physical Planning Office of the Advisor, to Manager of Land Informatoin Section Department of Lands & Physical Planning, Boroko – NCD dated 16 August 2016. The letter related to application to get copies | Yes |

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| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>of LAF and LG over Portion 1784, Milinch Ulawun, Fourmil Talasea because Mr. George Dakoa has since passed away and his son George Linge following the title. Sighted Survey Plan for Portion 1773-1805 Catalogue No.15/606, dated 22 August 1984 – Portion 1784 allocated 7.2 Ha. Paid the LSS Lease Rental Fee of PGK150 every year.</p> <p>021088 – Sira Doang: Survey portion 1088 for 6.50 Ha dated 17 September 1981; Milinich of Ulawun Fourmil of Talasea; File No. 79-1362 Plan used 15/380. Pays land rental PGK24.50 per annum;</p> <p>021066 – Mitiro Salabung: Survey portion 1066 for 7.85 Ha dated 14 November 1979; Milinich of Ulawun Fourmil of Talasea; File No. 78-1098 Plan used 15/380.</p> <p>021107 – Naunigi Tugute: Survey portion 1107 for 7.80 Ha dated 23 August 1988; pays land rental PGK40.00 per annum; Milinch of Ulawun, Fourmil of Talasea; File No. 78/1416 Plan used 15/381.</p> <p>021188 – Busol Guambuli/Max Buson: Survey portion 1188 for 6.58 Ha dated 23 August 1988; Milinch of Ulawun, Fourmil of Talasea; File No. 78/1201 Plan used 15/385. Pays land rental PGK32.50 per annum;</p> <p>040767 – Andrew Lalou (LSS) has an Agricultural Lease Under Section 56, State Lease Volume 81 Folio 249. For Portion 767 Sale Malasi, Milinich of Banga, Fourmil Talasea,Area 14.28 ha. File No.79/2345; Plan used 15/296. Period: 99 years from 17/01/1984. Annual rent PGK63.50.</p> <p>040748 – Susan Daipo (LSS) has an Agricultural Lease Under Section 56, State Lease Volume 79 Folio 231. For Portion 748, Milinich of Banga, Fourmil Talasea, Area 7.96 Ha. File No.79/1447; Plan used 15/294. Period: 99 years from 17 October 1983. Transfer to Rodney Daipo of Bialla, dated 1 July 2010. Annual rent PGK35.00.</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|---|------------|
| | | 040610 – John Tabari (LSS) has an Agricultural Lease Under Section 56, State Lease. For Portion 610, Milinich of Banga, Fourmil Talasea, Area 10.21 Ha. File No.86/1569; Ref. Plan 15/185. Period: 99 years from 13 October 1986. Annual rent PGK78.75. | |
| 2.1.3 | A mechanism for ensuring compliance shall be implemented. - Minor compliance - | On annual basis, legal compliance of HOPL is assessed by the ESD. The last assessment was on 24 July 2018. The legal compliance checklist was checked against the list of PNG Applicable Legislations. All of the applicable legislations are accessed to be complied. Monitoring through “Statutory Required Plants & Equipment Register – Updated 12 November 2018 for 2019”. Indicating the requirement for Plantation: Factories (Pandi Estate), Pressure Vessels, Inflammable Liquids & Dangerous Goods Store; Factories (Navo Estate), Pressure Vessels, Inflammable Liquids & Dangerous Goods Store; Factories (Navo Mill), Pressure Vessels, Inflammable Liquids & Dangerous Goods Store; Factories (Barema Mill), Pressure Vessels, Inflammable Liquids & Dangerous Goods Store; Factories (Hargy Mill), Pressure Vessels, Inflammable Liquids & Dangerous Goods Store; Evidence: Receipt Department of Labour and Industrial Relations No.A048490 dated 28 February 2019, received from hargy Oil Palms Limited; in payment of Inflammable; Total received PGK 15,540; received by VVAVINE; | Yes |
| | Associated Smallholder Requirement: OPIC and Companies to monitor compliance during extension activities. Block inspection reports to provide evidence of compliance. | Based on interview with associated smallholder, they understand that they have to comply with PNG legal requirements, as suggested by OPIC’s extension officer. For example, for land owners sitting on state land/Land Settlement Scheme – LSS they have to pay for land rental fee to the government.Changes in law informed by the Company secretary. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | |
|--|---|---|------------|---------------|-----------------------|-----------|---|--|--|--------|---|--|--|--------|---|---|--|-------|-----|
| 2.1.4 | A system, appropriate to the scale of the organisation, for tracking any changes in the law shall be implemented. - Minor compliance - | On annual basis, legal compliance of HOPL is assessed by the ESD. The last assessment was on 24 July 2019. The legal compliance checklist was checked against the list of PNG Applicable Legislations. All of the applicable legislations are accessed to be complied | Yes | | | | | | | | | | | | | | | | |
| | Associated Smallholder Requirement: OPIC to disseminate information on legal changes to associated Smallholders. Company Smallholder departments to disseminate this information in locations where OPIC is not represented. | Based on interview with associated smallholder, they acknowledge that OPIC gives information on latest legal requirement/update. Understand that they have to comply with PNG legal requirements. For example, for land owners sitting on state land/Land Settlement Scheme – LSS they have to pay for land rental fee to the government. | Yes | | | | | | | | | | | | | | | | |
| 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 | For companies, documents that demonstrate legal ownership or lease and permitted use of the land must be available. - Major compliance - | <p>The land titles for lands that was developed by HOPL are available and kept onsite. Acknowledging the deficiency of the local PNG government in issuing the land titles, the following are updates on the land title received at Pandi Estate since last assessment.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Land title No</th> <th>Issue date & validity</th> <th>Area (ha)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sulvuse Estates Limited, Portion 1; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/181</td> <td>Commencement date 21/02/2018; valid 99 years</td> <td>383.00</td> </tr> <tr> <td>2</td> <td>Hargy Oil Palms Limited, Portion 3; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/182</td> <td>Commencement date 21/02/2018; valid 99 years</td> <td>146.00</td> </tr> <tr> <td>3</td> <td>Hargy Oil Palms Limited, Portion 6; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference:</td> <td>Commencement date 21/02/2018; valid 99 years</td> <td>35.00</td> </tr> </tbody> </table> | No | Land title No | Issue date & validity | Area (ha) | 1 | Sulvuse Estates Limited, Portion 1; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/181 | Commencement date 21/02/2018; valid 99 years | 383.00 | 2 | Hargy Oil Palms Limited, Portion 3; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/182 | Commencement date 21/02/2018; valid 99 years | 146.00 | 3 | Hargy Oil Palms Limited, Portion 6; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: | Commencement date 21/02/2018; valid 99 years | 35.00 | Yes |
| No | Land title No | Issue date & validity | Area (ha) | | | | | | | | | | | | | | | | |
| 1 | Sulvuse Estates Limited, Portion 1; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/181 | Commencement date 21/02/2018; valid 99 years | 383.00 | | | | | | | | | | | | | | | | |
| 2 | Hargy Oil Palms Limited, Portion 3; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/182 | Commencement date 21/02/2018; valid 99 years | 146.00 | | | | | | | | | | | | | | | | |
| 3 | Hargy Oil Palms Limited, Portion 6; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: | Commencement date 21/02/2018; valid 99 years | 35.00 | | | | | | | | | | | | | | | | |

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| | | 4 | Hargy Oil Palms Limited, Portion 7; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/185 | Commencement date 21/02/2018; valid 99 years | 65.00 | |
| | | 5 | Gamupa Oil Palm Development, Portion 13; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/191 | Commencement date 21/02/2018; valid 99 years | 614.00 | |
| | | 6 | Gamupa Oil Palm Development, Portion 12; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/190 | Commencement date 21/02/2018; valid 99 years | 27.15 | |
| | | 7 | Gamupa Oil Palm Development, Portion 11; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/189 | Commencement date 21/02/2018; valid 99 years | 20.70 | |
| | | 8 | Gamupa Oil Palm Development, Portion 10; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/188 | Commencement date 21/02/2018; valid 99 years | 92.91 | |
| | | 9 | Gamupa Oil Palm Development, Portion 9; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/187 | Commencement date 21/02/2018; valid 99 years | 20.90 | |
| | | 10 | Gamupa Oil Palm Development, Portion 5; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/184 | Commencement date 21/02/2018; valid 99 years | 186.50 | |
| | | 11 | Gamupa Oil Palm Development, Portion 4; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/183 | Commencement date 21/02/2018; valid 99 years | 27.89 | |
| | | 12 | Abulmosi Oil Palm Estate Ltd, Portion 8; Ulawun Milinch, Talasea Fourmil; East New Britain; Title reference: 25/186 | Commencement date 21/02/2018; valid 99 years | 1,390.00 | |
| | Associated Smallholder Requirement: | Sample of smallholder verified: 311773 Malcolm Gar Avusi: State Lease Volume 4, Folio 185; Registrar of Title 19 November 1993. The Minister of Lands and Physical Planning grants to Malcolm Gar Avusi for 99 years from 16 April 1992 – for Portion 1773, Milinch Ulawun, Fourmil Talasea containing an area of 7.94 Ha. | | | Yes | |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| <p>For associated smallholders, evidence of the “Right to use the land” will be demonstrated by compliance with the following:</p> <p>a) Land title or lease <u>OR</u> uncontested occupancy where</p> <ul style="list-style-type: none"> boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General <u>or</u> boundaries have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; <u>AND</u> there is no significant dispute over tenure (see 2.2.4) | <p>311790 Laurence Kitinauru: Agricultural Lease Under Section 49 No.19366/1790 for 6.78 Ha, under name Lawrence Kitinauru, dated 16 April 1992 and valid for 99 years. Location portion 1790, Milinch Ulawun, Fourmil Talasea, West New Britain Province. Based on Survey Plan Catalogue 15/606 dated 22 August 1989.</p> <p>311784 George Linge: Letter from West New Britain Provincial Administration – Division of Lands and Physical Planning Office of the Advisor, to Manager of Land Informatoin Section Department of Lands & Physical Planning, Boroko – NCD dated 16 August 2016. The letter related to application to get copies of LAF and LG over Portion 1784, Milinch Ulawun, Fourmil Talasea because Mr. George Dakoa has since passed away and his son George Linge following the title. Sighted Survey Plan for Portion 1773-1805 Catalogue No.15/606, dated 22 August 1984 – Portion 1784 allocated 7.2 Ha. Paid the LSS Lease Rental Fee of PGK150 every year.</p> <p>331872 Mathew Rere: State Lease Volume 7, Folio 160; Registrar of Title 25 September 1995. The Minister grants to Matthew Rere for 99 years from 25 March 1993 to 24 March 2092 – for Portion 1872, Milinch Ulawun, Fourmil Talasea containing an area of 6.56 Ha.</p> <p>331955 Kairen Wapiwan: State Lease Volume 7, Folio 160; Registrar of Title 12 September 1995. The Minister grants to Kairin Wapiwang for 99 years from 25 March 1993 to 24 March 2092 – for Portion 1955, Milinch Ulawun, Fourmil Talasea containing an area of 7.02 Ha. The Lease dated 28 July 1995. Sighted Survey Plan for Portion 1948-1959 Catalogue No.15/629, dated 7 November 1990 – Portion 1955 have 7.02 Ha.</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>070753 James Wesley: Clan Land Use Agreement No.070753 for James Wesley, to use the land known as Madudua and which allocated 2 Ha as the VOP Block No.070753 of Noau VOP area; dated 31 August 2016 and period 25 years.</p> <p>077252 Michelle R Vulia: Clan Land Use Agreement No.077252 for Michelle Rahab Vulia, to use the land known as Madudua and which allocated 2 Ha as the VOP Block No.077252 of Noau VOP area; dated 31 August 2016 and period 25 years.</p> <p>370017 Clement Balele: Clan Land Use Agreement No.370017 for Clement Balele, to use the land known as Sule and which allocated 2 Ha as the VOP Block No.370017 of Galilolo VOP area; dated 12 November 2016 and period 20 years.</p> <p>380088 Hubertina Lagisa: Clan Land Use Agreement No.380088 for Hubertina Lagisa, to use the land known as Alui and which allocated 2 Ha as the VOP Block No.380088 of Tuanepou VOP area; dated 5 November 2016 and period 20 years.</p> <p>380115 Rudolf Meli: Clan Land Use Agreement No.380115 for Rudolf Meli, to use the land known as Alui and which allocated 2 Ha as the VOP Block No.380115 of Tianepou VOP area; dated 3 November 2016 and period 20 years.</p> <p>390016 Martin Tevang: - Licence No.007/2017 IR for Gamupa Oil Palm Development Limited licenced for a period of 12 months started from 24 July 2017 to enter upon and occupy the land described in the schedule for Oil Palm Expansion Project: Portion 5, Milinch Ulawun, Fourmil Talasea, East New Britain Province containing a total land area of 186.2 Ha on Survey Plan Catalogue No.15/946; Land File Reference 18366/05, dated 21 July 2017.</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>- Memorandum of Agreement between Gamupa Oil Palm Development Ltd and Martin Tevang, block No.390016. Gamupa Oil Palm Development Ltd has indefeasible title over Agricultural State Lease Title described as Volume 25, Folio 184, Portion 5, Milinch of Ulawun, Fourmil of Talasea. Gamupa Oil Palm Development Ltd consent to release 2 Ha of its oil palm estate land to Martin Tevang for purpose of harvesting and supplying its FFB to Hargy Oil Palms Ltd, for the duration of Memorandum. Signed by Lawrence Wana on 20 July 2018. The agreement valid for 10 years until 30 July 2028.</p> <p>390101 Andrew Kepu:</p> <p>- Memorandum of Agreement between Gamupa Oil Palm Development Ltd and Andrew Kepu, block No.390101. Gamupa Oil Palm Development Ltd has indefeasible title over Agricultural State Lease Title described as Volume 25, Folio 184, Portion 5, Milinch of Ulawun, Fourmil of Talasea. Gamupa Oil Palm Development Ltd consent to release 2 Ha of its oil palm estate land to Andrew Kepu for purpose of harvesting and supplying its FFB to Hargy Oil Palms Ltd, for the duration of Memorandum. Signed by Lawrence Wana on 26 July 2018. The agreement valid for 10 years until 30 April 2028.</p> <p>390099 Christopher Metore:</p> <p>- Memorandum of Agreement between Gamupa Oil Palm Development Ltd and Christopher Metore, block No.390099. Gamupa Oil Palm Development Ltd has indefeasible title over Agricultural State Lease Title described as Volume 25, Folio 184, Portion 5, Milinch of Ulawun, Fourmil of Talasea. Gamupa Oil Palm Development Ltd consent to release 2 Ha of its oil palm estate land to Chritopher Metore for purpose of harvesting and supplying its FFB to Hargy Oil Palms Ltd, for the duration of Memorandum. Signed by Lawrence Wana on 26 July 2018. The agreement valid for 10 years until 30 April 2028.</p> <p>440021 Maria Gabu Beno:</p> | |

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|-----------------------|--|------------|
| | <p>Clan Land Use Agreement No.440021 for Maria Gabu Beno, to use the land known as Madedua and which allocated 2 Ha as the VOP Block No.440021 of Nantabu VOP area; dated 17 February 2017 and period 20 years.</p> <p>440053 John Koini: Clan Land Use Agreement No.440053 for John Koini, to use the land known as Labale and which allocated 2 Ha as the VOP Block No.440053 of Nantabu VOP area; dated 6 June 2018 and period 25 years.</p> <p>45003 Leonard Bubu: Clan Land Use Agreement No.45003 for Leonard Bubu, to use the land known as Ibana and which allocated 2 Ha as the VOP Block No.45003 of Malaso VOP area; dated 13 November 2016 and period 20 years.</p> <p>321081 Nick Katun: Application for a Replacement Title for Land: Portion 1081; Milinch Banga; Fourmil Talasea; West New Britain Province; Owner: Nick Katun. Statutory Declaration: the title was lost. Sign dated 20 May 2017. Data verification in Lands Office for Portion No.1081 have been issued on 23 November 1990; Acquisition Reference No.NLD1398, date 14 June 1968. Sighted Survey Plan for Portion No.1076-1085 & 1113-1120 Catalogue No.15/668 dated 29 May 1991 – in the Survey Plan, Portion No.1081 sets 6.9 Ha.</p> <p>321082 Leonora Kolosi: Application for a Replacement Title for Land: Portion 1082; Milinch Banga; Fourmil Talasea; West New Britain Province; Owner: Leonora Kolosi. Statutory Declaration: the title was issued but never been received by the lessee. Land Board Recommendation No.1922, dated 7 July 1994 for Portion 1056-1166 have been recommended to be granted the lease. Data verification in Lands Office for Portion No.1082 have been issued on 23 November 1990; Acquisition Reference No.NLD1398, date 14 June</p> | |

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|-----------------------|--|------------|
| | <p>1968. Sighted Survey Plan for Portion No.1076-1085 & 1113-1120 Catalogue No.15/668 dated 29 May 1991 – in the Survey Plan, Portion No.1082 sets 6.88 Ha.</p> <p>111174 Mark Daniel: Clan Land Use Agreement No.111174 for Mark Daniel, to use the land known as Rou and which allocated 2 Ha as the VOP Block No.111174 of Kiava VOP area; dated 17 June 2018 and period 25 years.</p> <p>111123 Laeli Toga: Clan Land Use Agreement No.111123 for Laeli Toga, to use the land known as Pela and which allocated 2 Ha as the VOP Block No.111123 of Kiava VOP area; dated 6 May 2016 and period 20 years.</p> <p>111111 Lesia Walau: Clan Land Use Agreement No.111111 for Lesia Walau, to use the land known as Pela and which allocated 2 Ha as the VOP Block No.111111 of Kiava VOP area; dated 6 May 2016 and period 20 years.</p> <p>332002 Ambross Vitata: Sighted Survey Plan for Portion No.2001-2018 Catalogue No.15/638 dated 5 September 1990 – in the Survey Plan, Portion No.2002 sets 6.85 Ha. Application for a Replacement Title for Land: Portion 2002; Milinch Ulawun; Fourmil Talasea; West New Britain Province; Owner: Ambross Vitata VA. Statutory Declaration: the title was lost. Transmission Application (Death) for Portion 2002; Milinch Ulawun; Fourmil Talasea; West New Britain Province; from (late) Ambross Vitata to Koni Vitata; dated 25 June 2019.</p> <p>031952 Primus Aulai: Sighted Survey Plan for Portion No.1948-1959 Catalogue No.15/629 dated 7 November 1990 – in the Survey Plan, Portion No.1952 sets 6.53 Ha.</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | <p>Application for a Replacement Title for Land: Portion 2002; Milinch Ulawun; Fourmil Talasea; West New Britain Province; Owner: Primus Aulai. Statutory Declaration: the title was lost; dated 18 April 2017 Planting Approval Form – Replant dated 16 August 2018. Block No.1952; Area Kabaiya LSS; Owner Primus Aulai; planting stage: Replanting; Area for 2 Ha (240 palms); Total block area: 6 Ha; Proof of Ownership: Yes;</p> <p>050212 Jacob Milale: Sighted Survey Plan for Portion No.205-215 Catalogue No.15/47 dated 25 August 1968 – in the Survey Plan, Portion No.212 allocated 6.53 Ha. Application for a Replacement Title for Land: Portion 212; Milinch Banga; Fourmil Talasea; West New Britain Province; Owner: Jacob Milale. Statutory Declaration: the title was lost; dated 16 February 2018.</p> <p>321160 Teteri Loloma: Sighted Survey Plan for Portion No.1138-1167 Catalogue No.15/669 dated 30 may 1991 – in the Survey Plan, Portion No.1160 allocated 6.5 Ha. Application for a Replacement Title for Land: Portion 1160; Milinch Banga; Fourmil Talasea; West New Britain Province; Owner: Teteri Loloma. Statutory Declaration: the title was lost; dated 16 February 2018.</p> <p>050199 Ieisa Isa: State Lease Volume 27, Folio 226; Registrar of Title 17 November 1966. The Administrator of PNG grants to Esau for 99 years from 29 July 1965 – for Portion 199, Milinch Banga, Fourmil Talasea containing an area of 15 Acres. The Lease dated 2 November 1966. Transmission Application (Death) for Portion 199; Milinch Banga; Fourmil Talasea; West New Britain Province; from (late) Aliwula Esau to Ieisa Isa; dated 25 June 2019.</p> <p>050188 Nerius Suali</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | <p>Contract for Sale and Purchase of Land between Suali Tabisou and Nerius Suali, dated 8 August 2014 for Portion 0188, Milinch Banga, Fourmil Talasea, West New Britain Province. State Lease Volume 28, Folio 18. Land Transfer for Title Volume 28, Folio 18, Portion 0188, Milinch Banga, Fourmil Talasea, West New Britain Province; from Transferor Suali Tabisou to Transferee Nerius Suali, dated 1 September 2014. Sighted Survey Plan for Portion No.187-193 Catalogue No.15/24 dated 26 August 1965 – in the Survey Plan, Portion No.188.</p> <p>050175 Sam Tiaro: State Lease Volume 2, Folio 10; Registrar of Title 25 November 1966. The Administrator of PNG grants to Waisibo for 99 years from 29 July 1965 – for Portion 175, Milinch Banga, Fourmil Talasea containing an area of 15 Acres. The Lease dated 16 November 1966. Sighted Survey Plan for Portion 149-249 Catalogue No.15/45 Transmission Application (Death) for Portion 175; Milinch Banga; Fourmil Talasea; West New Britain Province; from (late) Tialo Waisibo to Sam Tiaro; dated 25 June 2019.</p> <p>050174 Paulias Aliai: State Lease Volume 2, Folio 10; Registrar of Title 25 November 1966. The Administrator of PNG grants to Aliai Ubia for 99 years from 29 July 1965 – for Portion 174, Milinch Banga, Fourmil Talasea containing an area of 33 Acres. The Lease dated 16 November 1966. Statement letter from Department of Provincial & Local Government Affairs to Registrar of Titles Department of Lands and Physical Planning, Boroko dated 12 December 2012 related to Transmission of Deceased Estate-Portion 174, Milinch Megigi, Fourmil Talasea. Please effect transfer of that title to Paulias Aliai, the eldest son as sole proprietor. Transmission Certificate for Title Volume 2, Folio 10, Portion 174, Milinch Banga, Fourmil Talasea – from deceased proprietor Aliai Ubia to Paulias Aliai, dated 12 December 2012.</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| <p>2.2.2 For Company owned or leased land, Legal boundaries shall be clearly demarcated by identifiable markers.</p> <p>- Minor compliance -</p> | <p>In Hargy Estate Boundary pegs No.3, coordinates 9413090 N 287980 E, adjacent to block 15K01; Boundary pegs No.4, coordinates 9413149 N 287911 E, adjacent to block 15K01/K03; Boundary pegs No.5, coordinates 9413209 N 287978 E, adjacent to block 15K03; Boundary pegs No.16, coordinates 9413744 N 288571 E, adjacent to block 15K04; Boundary pegs No.3, coordinates 9413840 N 2888625 E, adjacent to block 15K04;</p> <p>In Navo Estate: Boundary near field 2 block 14M26 at 5°06'51.95"S-151°13'27.62"E; Boundary near field 15 block 01Q25 at 5°06'46.96"S-151°14'24.81"E; Boundary near field 16 block 01Q26 at 5°07'2.77"S-151°15'9.58"E;</p> <p>In Pandi Estate: Boundary 1 next to Elementary School at 5°01'12.73"S-151°24'48.12"E; Boundary 0 next to customary land at 5°01'16.15"S-151°24'44.24"E; Boundary 3 next to block 18C04 at 5°01'53.77"S-151°25'9.50"E;</p> | <p>Yes</p> |
| <p>Associated Smallholder Requirement:</p> <p>For Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries.</p> | <p>311773 Malcolm Gar Avusi: LSS Boundary 1 at 508°12.80"S-15106'57.02"E; 2 at 508°19.61"S-15106'50.72"E; 3 at 508°25.70"S-15107'3.40"E; 4 at 508°19.58"S-15107'3.40"E;</p> <p>311784 George Linge: LSS Boundary 1 at 508°31.54"S-15107'0.93"E; 2 at 508°37.61"S-15107'5.83"E; 3 at 508°43.97"S-15106'58.48"E; 4 at 508°37.94"S-15106'55.36"E;</p> <p>331872 Mathew Rere: Boundary 1 at 507°21.46"S-151010'02.83"E; 2 at 507°16.30"S-15109'57.93"E; 3 at 507°23.74"S-15109'50.90"E;</p> | <p>Yes</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | 331955 Kairen Wapiwan: Boundary 1 at 507°31.23"S-151011'17.83"E; 2 at 507°23.80"S-151011'25.49"E; 3 at 507°27.92"S-151011'30.40"E; 4 at 507°36.10"S-151011'22.89"E; | |
| 2.2.3 | Where there are or have been disputes over the right to use the land or the position of a boundary, for Company land, additional proof of legal acquisition of title and evidence that fair value has been paid to previous owners and/or occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance - | There is no land acquisition by HOPL since the last assessment. | Yes |
| | Associated Smallholders Requirement: For Smallholder land, agreement of resolution of disputes shall be demonstrated by appropriate documentation or by demonstrated agreement of interested parties. | Based on field visit and interview with associated smallholder, no dispute over land. | Yes |
| 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 - | In order to manage any land dispute, the Land Negotiation Procedures was established. Based on interview with stakeholders, audit team noted case of overplanting in Hargy Estate, Kerakera Division III, Area 13 Subject Area has been acquired by HOPL who has Title to Portion 2044 and part of the area was given back to the Urumaili Development Corporation. HOPL is paying a standard Royalty percentage of 10% to all and this includes the UDC. A MOU between HOPL and Urumaili Land Group (UDC) on the 17 April 2012. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | |
|-----------------------|---|--|-----------------|------|--------------------|-----------------|----------------|----|---------|-----------------|----------------|----|---------|-----------------|----------------|----------------|--------------------|-----------------|--|
| | | <p>Hargy Oil Palms Limited has been in constant negotiations with executives of Urumaili Incorporated Land Group with regard to compensation in terms of FFB royalty and land rental. The initial compensation sum of K6,760.93 has been increased to PGK15,212.00, which is in line with the national government's standard valuation rates as contrary to the sum of PGK208,330.00 claimed by Urumaili Incorporated Land Group.</p> <p>The monies were supposed to have been paid out back in 2009, however due to several reason, caused the long delay in settling this matter. At this stage, the Urumaili ILG is not registered and fully recognised at law to claim ownership over this disputed land area, therefore situation remains unresolved until such time they are comply with the law by ensuring the ILG is registered and complies with the law.</p> <p>In addition, the reas identified as overplanting has been rezoned, documented in map and excluded from the company lease. Palms in overplanted areas will be poisoned and area left to bush. Survey boundary checking and reconfirmation exercise will continue and any area identified as overplanting will be resolved in the same manner.</p> <p>Area 13 overplanting 8.10 Ha in total overplanted into customary land, area already mapped and excluded from company lease area. No upkeep and maintenance of overplanted area since overplanting was identified and rezoned.</p> <p>Area 11 overplanting All palms along the survey boundary during the replant phase but outside the company lease will be poisoned. Audit team have verified the continuous action plan:</p> <table border="1"> <thead> <tr> <th>Task</th> <th>Area</th> <th>Person Responsible</th> <th>Completion date</th> </tr> </thead> <tbody> <tr> <td>Palm poisoning</td> <td>11</td> <td>Kuburom</td> <td>30 October 2019</td> </tr> <tr> <td>Palm poisoning</td> <td>13</td> <td>Kuburom</td> <td>30 October 2019</td> </tr> <tr> <td>Palm poisoning</td> <td>Other (if any)</td> <td>Plantation Manager</td> <td>30 October 2019</td> </tr> </tbody> </table> | Task | Area | Person Responsible | Completion date | Palm poisoning | 11 | Kuburom | 30 October 2019 | Palm poisoning | 13 | Kuburom | 30 October 2019 | Palm poisoning | Other (if any) | Plantation Manager | 30 October 2019 | |
| Task | Area | Person Responsible | Completion date | | | | | | | | | | | | | | | | |
| Palm poisoning | 11 | Kuburom | 30 October 2019 | | | | | | | | | | | | | | | | |
| Palm poisoning | 13 | Kuburom | 30 October 2019 | | | | | | | | | | | | | | | | |
| Palm poisoning | Other (if any) | Plantation Manager | 30 October 2019 | | | | | | | | | | | | | | | | |
| 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 | <p>Samples of grievance in the HOPL Grievance Database was verified. There was not significant land conflict reported between land owners and HOPL. Interview with clan leaders confirmed a case:</p> | Yes | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|------------|
| <p>with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p> | <p>Subject Area has been acquired by HOPL who has Title to Portion 2044 and part of the area was given back to the Urumaili Development Corporation. HOPL is paying a standard Royalty percentage of 10% to all and this includes the UDC. A MOU between HOPL and Urumaili Land Group (UDC) on the 17 April 2012.</p> <p>Hargy Oil Palms Limited has been in constant negotiations with executives of Urumaili Incorporated Land Group with regard to compensation in terms of FFB royalty and land rental. The initial compensation sum of K6,760.93 has been increased to PGK15,212.00, which is in line with the national government's standard valuation rates as contrary to the sum of K208,330.00 claimed by Urumaili Incorporated Land Group.</p> <p>The monies were supposed to have been paid out back in 2009, however due to several reason, caused the long delay in settling this matter. At this stage, the Urumaili ILG is not registered and fully recognised at law to claim ownership over this disputed land area, therefore situation remains unresolved until such time they are comply with the law by ensuring the ILG is registered and complies with the law.</p> <p>Hargy Oil Palms Limited had overplanted into customary land in Area 11 and Area 13 during initial planting program and overplanting identified during company survey boundary confirmation checks in preparation for replanting. Areas identified as overplanting has been rezoned, documented in map and excluded from the company lease. Palms in overplanted areas will be poisoned and area left to bush. Survey boundary checking and reconfirmation exercise will continue and any area identified as overplanting will be resolved in the same manner.</p> <p>Area 13 overplanting 8.10 Ha in total overplanted into customary land, area already mapped and excluded from company lease area. No upkeep and maintenance of overplanted area since overplanting was identified and rezoned.</p> <p>Area 11 overplanting All palms along the survey boundary during the replant phase but outside the company lease will be poisoned.</p> | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance |
|---|--|---|----------------|--------------------|-----------------|------------|
| | | Task | Area | Person Responsible | Completion date | |
| | | Palm poisoning | 11 | Kuburom | 30 October 2019 | |
| | | Palm poisoning | 13 | Kuburom | 30 October 2019 | |
| | | Palm poisoning | Other (if any) | Plantation Manager | 30 October 2019 | |
| 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 - | Stakeholders were interviewed to confirmed that there is no such evidence that HOPL has instigated violence in maintaining peace. | | | | Yes |
| | Associated Smallholder Requirement: 2.2.4, 2.2.5 and 2.2.6 – These indicators apply to Smallholders. | Based on field visit and interview with stakeholders; there is no such evidence that associated smallholder instigated violence to resolve conflict. | | | | Yes |
| Criterion 2.3: | | | | | | |
| Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | | | | | | |
| 2.3.1 | Maps of an appropriate scale showing the extent of recognised 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 - | HOPL is maintaining maps of the Customary lands that are being lease leased back from the clan owners for Plantations (Sena, Vamakuma and Remailing). The overall map covering the entire Lands that are leased by HOPL with scale of 1:88,000 (which includes the Plantations Lands) is available and HOPL maintained its' own GIS team to managed the mapping. The assessment team had verified the availability of the maps. HOPL has identify a Continuous Improvement Plan to include all the Village Oil Palm location into the HOPL GIS system with geo-coordinates. | | | | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| <p>2.3.2</p> <p>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:</p> <p>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;</p> <p>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;</p> <p>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.</p> <p>- Minor compliance -</p> | <p>HOPL has fully developed the leasehold land transferred from predecessors or through purchase and transfer of title. There will be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)). The LLBs are land belongs to the clan. Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>Samples of records reviewed:</p> <p>Abunava ILG – The letter of interest and consent to HOPL from Abunava Clan to HOPL was dated 20 January 2008. Series of negotiation on the terms and conditions on the leasing is available (e.g. Lease Leased Back awareness conducted on 2 December 2008) prior signing the MoU on 11 April 2013. The Sub-leasing agreement is still in progress due to pending of land title from the PNG government. Map of the area surveyed by PNG General Surveyor dated July 2012 is available.</p> <p>Alaba Development Corporation – The letter of interest and consent to HOPL from Alaba was dated 17 July 2008. Series of negotiation on the terms and conditions on the leasing is available (e.g. Lease Leased Back awareness conducted on 30 September 2008; meeting minutes dated 13 January 2010 on the sub-leasing agreement) prior signing the MoU on 08 March 2010. The Sub-leasing agreement was dated 5 September 2011. Map of the area surveyed by PNG General Surveyor dated 10 March 2010 is available.</p> <p>In smallholder 031952 Primus Aulai: Sighted Survey Plan for Portion No.1948-1959 Catalogue No.15/629 dated 7 November 1990 – in the Survey Plan, Portion No.1952 sets 6.53 Ha.</p> | <p>Yes</p> |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <p>Application for a Replacement Title for Land: Portion 2002; Milinch Ulawun; Fourmil Talasea; West New Britain Province; Owner: Primus Aulai. Statutory Declaration: the title was lost; dated 18 April 2017</p> <p>Pre-planting Activity Checklist for Block No.1952; Area Kabaiya; Owner Primus Aulai; planting stage: Replanting; Area for 2 Ha (240 palms); use of fire: Nil – review done by Moale Henad and Chris Tondiwi dated 4 October 2018.</p> <p>Planting Approval Form – Replant dated 16 August 2018. Block No.1952; Area Kabaiya LSS; Owner Primus Aulai; planting stage: Replanting; Area for 2 Ha (240 palms); Total block area: 6 Ha; Proof of Ownership: Yes; Vegetation OK; Buffer Zone OK; Topograpghy Prequalification: Sloping 5-10⁰; Threatened species NO; Wildlife management area NO; Peat soil present NO; – review done by Paul Asei.</p> <p>380115 Rudolf Meli: Clan Land Use Agreement No.380115 for Rudolf Meli, to use the land known as Alui and which allocated 2 Ha as the VOP Block No.380115 of Tianepou VOP area; dated 3 November 2016 and period 20 years. Clan Leader Nagoa 1: Chris Lagisa; Clan Leader 2: Ebarth Taumosi; Clan Leader 3: James Solomale; OPIC: Reuben Taukaro; Chris Tondiwi</p> <p>390016 Martin Tevang: - Licence No.007/2017 IR for Gamupa Oil Palm Development Limited licenced for a period of 12 months started from 24 July 2017 to enter upon and occupy the land described in the schedule for Oil Palm Expansion Project: Portion 5, Milinch Ulawun, Fourmil Talasea, East New Britain Province containing a total land area of 186.2 Ha on Survey Plan Catalogue No.15/946; Land File Reference 18366/05, dated 21 July 2017. - Memorandum of Agreement between Gamupa Oil Palm Development Ltd and Martin Tevang, block No.390016. Gamupa Oil Palm Development Ltd has indefeasible title over Agricultural State Lease Title described as Volume 25, Folio 184, Portion 5, Milinch of Ulawun, Fourmil of Talasea. Gamupa Oil Palm Development Ltd consent to release 2 Ha of its oil palm estate land to Martin Tevang for purpose of harvesting and supplying its</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|------------|
| | | FFB to Hargy Oil Palms Ltd, for the duration of Memorandum. Signed by Lawrence Wana on 20 July 2018. The agreement valid for 10 years until 30 July 2028. | |
| 2.3.3 | All relevant information shall be available in appropriate forms and the English language including assessments of impacts, proposed benefit sharing, and legal arrangements. Where understanding of the English language is limited, translations or summaries in the Tok Pisin language must be provided. - Minor compliance - | All previous records are still kept and maintained in the Land Departments/Community Affairs Department. There are no new LLBs and incorporation of ILGs since last assessment. | Yes |
| 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 - | ILGs are represented by the appointed clan leaders. In reviewing the previous MoU sample (Urumaili ILG), the signatory of the MoU are by the clan leaders. Interview with Urumaili ILG, Ewasse Land Owner Association, Apupul Committee confirmed that they understood the schedule arrangement and confirmed that they are free to select their representative. | Yes |
| Principle 3: Commitment to long-term economic and financial viability | | | |
| Criterion 3.1 | | | |
| There is an implemented management plan that aims to achieve long-term economic and financial viability. | | | |
| 3.1.1 | A business or management plan (minimum three years) shall be documented that includes, where appropriate, the projected production contribution from associated Smallholders | HOPL had a ten years business plan initiated, compiled and distributed from The CEO's office. The document details among others the following data: Annual crop from plantation estates and the smallholders. Age profile, year planted & YPH (ranges from 17.59 – 30.06) The distribution of crop to the 3 mills to ensure optimum capacity. | Yes |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------------|--|-----------------------|---------------------|------------------------|--------------------|-----------|-------|---------|-----------|-------|-------|-----------|--------|------|--------|-----------------------|---------|------------------------|------------|-------|---------|------|--------|-----------|-------|---------|---|---|-------------|-------|---------|------|--------|-------|-------|-----------|------|---------|--|
| <p>- Major compliance -</p> | <p>Targeted extraction ratios CPO Hargy Mill 23.96%; Navo Mill 24.50%; Barema Mill 25.00%; average 24.53%; and CPKO Hargy Mill 2.16%; Barema Mill 2.08%. Production cost of both estates and mills. Projected Profit/Loss statement.</p> <p>The projected crop for a duration of 2019 - 2028 was sighted and summarised below:</p> <table border="1" data-bbox="1115 663 1675 799"> <thead> <tr> <th>Source of FFB</th> <th>Total FFB 2019-2029</th> <th>% contribution</th> </tr> </thead> <tbody> <tr> <td>Company Plantation</td> <td>3,924,222</td> <td>61.42</td> </tr> <tr> <td>Growers</td> <td>2,464,588</td> <td>38.58</td> </tr> <tr> <td>Total</td> <td>6,388,811</td> <td>100.00</td> </tr> </tbody> </table> <table border="1" data-bbox="1115 831 1899 994"> <thead> <tr> <th>Mill</th> <th>CPO-ER</th> <th>Total CPO 2019 - 2029</th> <th>CPKO-ER</th> <th>Total CPKO 2019 - 2029</th> </tr> </thead> <tbody> <tr> <td>Hargy Mill</td> <td>23.96</td> <td>453,468</td> <td>2.16</td> <td>40,937</td> </tr> <tr> <td>Navo Mill</td> <td>24.50</td> <td>628,675</td> <td>-</td> <td>-</td> </tr> <tr> <td>Barema Mill</td> <td>25.00</td> <td>482,554</td> <td>2.08</td> <td>93,506</td> </tr> <tr> <td>Total</td> <td>24.49</td> <td>1,564,697</td> <td>2.10</td> <td>134,443</td> </tr> </tbody> </table> <p>The breakdown of crop for the mill processing as shown above budgeted at 61.42% for plantation FFBS and 38.58% for Smallholder FFBS. The cost of relating to RSPO is reflected under item environment, whilst safety is absorbed under item health. PPE is taken into item staff welfare. All other related figures in details are available in soft copy and maintained in The CEO's Office. It is treated with full confidentiality released on discretion of the management. In conclusion the financial plan for the organisation has been prepared in comprehensive and adequate to address the direction of the business for the next 10 years. This is also made available as summarised below similar to the one prepared for the estates. The smallholders data is prepared through assistance given by OPIC and also the HOPL smallholders department.</p> | Source of FFB | Total FFB 2019-2029 | % contribution | Company Plantation | 3,924,222 | 61.42 | Growers | 2,464,588 | 38.58 | Total | 6,388,811 | 100.00 | Mill | CPO-ER | Total CPO 2019 - 2029 | CPKO-ER | Total CPKO 2019 - 2029 | Hargy Mill | 23.96 | 453,468 | 2.16 | 40,937 | Navo Mill | 24.50 | 628,675 | - | - | Barema Mill | 25.00 | 482,554 | 2.08 | 93,506 | Total | 24.49 | 1,564,697 | 2.10 | 134,443 | |
| Source of FFB | Total FFB 2019-2029 | % contribution | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Company Plantation | 3,924,222 | 61.42 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Hargy Mill | 23.96 | 453,468 | 2.16 | 40,937 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Navo Mill | 24.50 | 628,675 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Barema Mill | 25.00 | 482,554 | 2.08 | 93,506 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|---|--------------------|-------------------------|--------|--------|------|------|------|-------|--------|------|--------|------|--------|------|-----------|--------|----|--------|--------|-----|----|------------|-----|---------|-----|-----|--------|--------|-------|--------|----|----------|--------|--------|--------|-----|---|---|---|--------------------|---|---|---|---|-----|---|---|-----|
| | | These are subjects discussed among others during the monthly extension meeting between the management and the smallholders. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.1.2 | <p>An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.</p> <p>- Minor compliance -</p> | <p>This information of annual replanting program for the entire estates in the Hargy Palm Oil Limited (HOPL) is available. Due to eruption of Mount Ulawun, replanting program is revised following nursery is covered by ashes from the mountain. Below are the latest revision of replanting program, issued by CEO of HOPL on 24 September 2019. Contents of which were sighted and shown below; figures in hectares otherwise stated.</p> <p>Replanting</p> <table border="1"> <thead> <tr> <th>Estate/ Plantation</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Hargy</td> <td>246.74</td> <td>-</td> <td>458.34</td> <td>-</td> <td>236.12</td> <td>-</td> </tr> <tr> <td>Navo/Kiba</td> <td>-</td> <td>-</td> <td>447.11</td> <td>771.12</td> <td>-</td> <td>-</td> </tr> <tr> <td>Navo/Ibana</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>545.96</td> <td>839.15</td> </tr> <tr> <td>Total</td> <td>246.74</td> <td>-</td> <td>905.45</td> <td>771.12</td> <td>782.08</td> <td>839.15</td> </tr> </tbody> </table> | Estate/ Plantation | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | Hargy | 246.74 | - | 458.34 | - | 236.12 | - | Navo/Kiba | - | - | 447.11 | 771.12 | - | - | Navo/Ibana | - | - | - | - | 545.96 | 839.15 | Total | 246.74 | - | 905.45 | 771.12 | 782.08 | 839.15 | Yes | | | | | | | | | | | | |
| Estate/ Plantation | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hargy | 246.74 | - | 458.34 | - | 236.12 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Navo/Kiba | - | - | 447.11 | 771.12 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Navo/Ibana | - | - | - | - | 545.96 | 839.15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 246.74 | - | 905.45 | 771.12 | 782.08 | 839.15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <p>Associated Smallholder Requirement:</p> <p>3.1.2 OPIC to provide replanting program for Associated Smallholders.</p> | <p>Replanting Program for smallholder is remain the same with previous assessment. Oil Palm Industry Corporation (OPIC) of Papua New Guinea has provided replanting program for HOPL Associated Smallholders, called Bialla Oil Palm Project Eight Year Replanting Work Plan 2018-2025, prepared by Otto Pukam dated 25 September 2017. Below are replanting program of HOPL Associated Smallholder for period 2019-2025:</p> <table border="1"> <thead> <tr> <th rowspan="2">Area</th> <th colspan="7">Replanting Program (Ha)</th> </tr> <tr> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Cenaka</td> <td>16</td> <td>8</td> <td>141</td> <td>100</td> <td>70</td> <td>72</td> <td>129</td> </tr> <tr> <td>Maututu</td> <td>159</td> <td>108</td> <td>249</td> <td>210</td> <td>147</td> <td>88</td> <td>98</td> </tr> <tr> <td>Meramera</td> <td>-</td> <td>6</td> <td>2</td> <td>11</td> <td>2</td> <td>1</td> <td>4</td> </tr> <tr> <td>Independent Estate</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>178</td> <td>-</td> <td>-</td> </tr> </tbody> </table> | Area | Replanting Program (Ha) | | | | | | | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | Cenaka | 16 | 8 | 141 | 100 | 70 | 72 | 129 | Maututu | 159 | 108 | 249 | 210 | 147 | 88 | 98 | Meramera | - | 6 | 2 | 11 | 2 | 1 | 4 | Independent Estate | - | - | - | - | 178 | - | - | Yes |
| Area | Replanting Program (Ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cenaka | 16 | 8 | 141 | 100 | 70 | 72 | 129 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Maututu | 159 | 108 | 249 | 210 | 147 | 88 | 98 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Meramera | - | 6 | 2 | 11 | 2 | 1 | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Independent Estate | - | - | - | - | 178 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|------------------|-------------------------------|--------------------------|---------|-----|------------------|--------------|-----|---------------|---------|-----|------------------|--------------|-----|---------------|--------------|----|---------------|--------------|----|---------------|--------------|-----|---------------|---------|-----|------------------|--------------|-----|-----------------|--------------|-----|-----------------|--------------|----|-----------------|--------------|-----|-----------------|---------|-----|------------------|---------|-----|------------------|-------|-------|------------|--|
| | | <p>Below are numbers of seedling dispatched to smallholders for replanting in August 2019:</p> <table border="1"> <thead> <tr> <th>Contractor/Truck</th> <th>Number of Seedling dispatched</th> <th>CCID/Block dispatched to</th> </tr> </thead> <tbody> <tr><td>Ess Phy</td><td>120</td><td>Barema (03-1321)</td></tr> <tr><td>Rocken Trans</td><td>165</td><td>SOI (31-1698)</td></tr> <tr><td>Ess Phy</td><td>120</td><td>Barema (03-1321)</td></tr> <tr><td>Rocken Trans</td><td>160</td><td>SOI (31-1707)</td></tr> <tr><td>Rocken Trans</td><td>95</td><td>SOI (31-1707)</td></tr> <tr><td>Rocken Trans</td><td>85</td><td>SOI (31-1720)</td></tr> <tr><td>Rocken Trans</td><td>155</td><td>SOI (31-1720)</td></tr> <tr><td>Ess Phy</td><td>160</td><td>Barema (03-1270)</td></tr> <tr><td>Rocken Trans</td><td>175</td><td>Gigipu (06-005)</td></tr> <tr><td>Rocken Trans</td><td>100</td><td>Gigipu (06-005)</td></tr> <tr><td>Rocken Trans</td><td>70</td><td>Gigipu (06-012)</td></tr> <tr><td>Rocken Trans</td><td>170</td><td>Gigipu (06-012)</td></tr> <tr><td>Ess Phy</td><td>126</td><td>Barema (03-1270)</td></tr> <tr><td>Ess Phy</td><td>120</td><td>Barema (03-1270)</td></tr> <tr><td>Total</td><td>1,821</td><td>(15.18 ha)</td></tr> </tbody> </table> | Contractor/Truck | Number of Seedling dispatched | CCID/Block dispatched to | Ess Phy | 120 | Barema (03-1321) | Rocken Trans | 165 | SOI (31-1698) | Ess Phy | 120 | Barema (03-1321) | Rocken Trans | 160 | SOI (31-1707) | Rocken Trans | 95 | SOI (31-1707) | Rocken Trans | 85 | SOI (31-1720) | Rocken Trans | 155 | SOI (31-1720) | Ess Phy | 160 | Barema (03-1270) | Rocken Trans | 175 | Gigipu (06-005) | Rocken Trans | 100 | Gigipu (06-005) | Rocken Trans | 70 | Gigipu (06-012) | Rocken Trans | 170 | Gigipu (06-012) | Ess Phy | 126 | Barema (03-1270) | Ess Phy | 120 | Barema (03-1270) | Total | 1,821 | (15.18 ha) | |
| Contractor/Truck | Number of Seedling dispatched | CCID/Block dispatched to | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ess Phy | 120 | Barema (03-1321) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 165 | SOI (31-1698) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ess Phy | 120 | Barema (03-1321) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 160 | SOI (31-1707) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 95 | SOI (31-1707) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 85 | SOI (31-1720) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 155 | SOI (31-1720) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ess Phy | 160 | Barema (03-1270) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 175 | Gigipu (06-005) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 100 | Gigipu (06-005) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 70 | Gigipu (06-012) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rocken Trans | 170 | Gigipu (06-012) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ess Phy | 126 | Barema (03-1270) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ess Phy | 120 | Barema (03-1270) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 1,821 | (15.18 ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 | <p>Standard Operating Procedures (SOPs) for estates and mills shall be documented.</p> <p>- Major compliance -</p> | <p>HOPL had a documented standard operating procedure (SOP) are indexed according for the subjects and scope covered. Copies are available in the estates and mill audited. Therein is shown issue no and date of revision. All SOPs are issued by the Environmental & Sustainability Manager. Format of SOP is standard through all the estates and mills. e.g.</p> <table border="1"> <tr> <td>PRO</td> <td>ESD</td> <td>GEN</td> <td>001</td> <td>09</td> <td>New Development</td> </tr> </table> <p>SOP for Mill Operation:</p> | PRO | ESD | GEN | 001 | 09 | New Development | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PRO | ESD | GEN | 001 | 09 | New Development | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | <p>PRO-ESD-GEN-011-10 dated 10 February 2016, for Palm Oli Mill Effluent (POME) Management. PRO-ESD-GEN-007-11 dated 10 February 2016, for Palm Kernel Oil Milling. PRO-ESD-GEN-006-11 dated 10 February 2016, for Palm Oil Milling. PRO-ESD-GEN-010-10 dated 5 February 2018, for Hydrocarbons Management. PRO-ESD-GEN-012-13 dated 21 July 2018, for Shipping Management. PRO-ESD-GEN-014-10 dated 5 April 2018, for Compound Management. PRO-ESD-GEN-013-10 dated 16 April 2018, for Transport Management.</p> <p>SOP for Estate Operation: PRO-ESD-SUS-001-05 dated 28 April 2017, for Integrated Pest Management Plan. PRO-ESD-GEN-003-09 dated 10 February 2016, for Upkeep. PRO-ESD-GEN-004-011 dated 16 April 2018, for Pesticides Management. PRO-ESD-GEN-002-09 dated 10 February 2016, for Harvesting. PRO-ESD-GEN-005-09 dated 10 February 2016, for Nursery. PRO-ESD-GEN-001-10 dated 15 April 2018, for New Development. Standard Operating Procedure for Soil Sampling in HOPL Plantations. Standard Operating Procedure for Inorganic Fertilizer in HOPL Plantations.</p> <p>All procedures are in English and in certain specific areas being translated in Tok Pisin. During interview with workers and staff, it is confirmed that they understood the procedures, e.g. in Hargy Estate, Kerakera Plantation Block 97J04 (Spraying); Block 15K06 (Fertiliser application), Block 01L01 (Harvesting). Hargy Mill (Weighbridge Operator, Boiler Operator). Navo Estate – Atata Plantation Block 00O21 (Harvesting), Block 01Q24 (Spraying), Nursery; Navo Mill (Weighbridge, Workshop, Loading Ramp, Boiler). Pandi Estate – Bakada Plantation Block 11C02 (Spraying), Block 11B02 (Landfill attendant).</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | | <p>The Biogas procedure is prepared by "KIS Group" in "Standard Operating Manual for Biogas System" - Procedure "BPOM Biogas Reactor Temperature Control", dated 3 October 2015.</p> <p>Smallholders The management of the procedure for the Smallholders is guided using a hand book titled "Gutpela rot bilong lukautim wel pam na kamap gutpela smolholda fama". Copies of which have been distributed to all new growers beginning 2011. This book contains content on guidelines/procedures among others: Sustainability, Harvesting standard, Fertilizer application, Block upkeep, health and safety, RSPO Compliances. Also other social issues e.g HIV/AIDS, malaria, family violence. HOPL smallholder department maintain production records and field day attendance records as avenues and evidences of discussion relating to performance and for improvement.</p> | |
| 4.1.2 | <p>A mechanism to check consistent implementation of procedures shall be in place.</p> <p>- Minor compliance -</p> | <p>Mechanism to check consistent implementation of procedures is in place from the lowest level of supervisory to the highest level like by The General Manager and external parties. On the Head office level the following among others are made:</p> <ul style="list-style-type: none"> - Regular evaluation of all procedures will be made annually 2 times/year audit by the Environment & Sustainability Department Workplace inspection by RSPO representative on monthly basis. - Chief Engineer visits to the mills. - Head of Plantation field inspection. - General Manager or Consultant Inspection. <p>Palm Oil Mill The Mill Manager inspects the mill on a daily basis. The Engineers, Supervisors monitors the entire production performance and product quality. This is made through the mill rounds and supervisions. The checklist forms sighted during the visit are sterilizer safety operation checklist, press station checklist. The product/lab data sheet is checked hourly by shift superintendent to ensure conformity to quality standard of</p> | Yes |

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| | <p>all process parameters. Monthly figures are analyzed/recommended for improved performance. Chief Engineer does regular visits to all the 3 mills and with a report being established. For example in Hargy Mill:</p> <ol style="list-style-type: none"> 1) Engineering Directors Visit Report (Geofrey Logan), visit date 10 April 2019. Result: (1) The pipe from the COT to the CST distribution tank is not centered in the distribution tank, so more crude oil is flowing to CST No. 1; (2) All the gauge glasses on the CST's are dirty and you can't see how much oil is in the tank. The gauge glasses need to be cleaned and light fitted behind the glass, so its easier to see the oil level. 2) Chief Engineer visit on 4 August 2019, related (1) Loose fruit spilled road from weighbridge toward ramp, ensure nil loose fruit and smashed from mill gate to ramp hopper. (2) Sterilizer door safety latches not properly engage with bleeding valve. Workers can open the door without opening bleeding valve to release residue pressure in the sterilizer, it can caused accident. <p>Barema Mill:</p> <ol style="list-style-type: none"> 1) Director of Engineering Visit Report, dated 24 April 2019; Inclined FFB Conveyor station; The FFB comng into the incline FFB conveyor to the sterilizer is falling on top of the conveyor chain, so the bottom plate should be extended at leas 200mm, so the FFB falls past the conveyor chain. Recommendation: Will be done by May 2019. Status: Done. 2) Director of Engineering Visit Report, dated 24 April 2019; Power House station; the genset room is being cleaned by water hose, which means water can get into the cable trench. Recommendation: the operator should do dry cleaning only or use a wet mop, but no use of water hose to clean the floor of the genset room. Status: Closed. 3) Mill EHS Monthly Inspection Visit, dated 25 August 2019; conducted by Thomas Tade. 4) Chief Engineer Visit, recorded by email dated 21 August 2019, by Gunasilan Nagarajoo. Result: BPOM roofing need to be clean up; sterilizer leakages need to rectifies as soonest; Sterilizer pivot, bearing | |

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|-----------------------|--|--|------------|
| | | <p>and cyinder not greased. Status: Done, reported by Mill Manager Email dated 23 August 2019.</p> <p>Navo Mill:</p> <ol style="list-style-type: none"> 1) Director of Engineering visit report dated 20 September 2018. Result: there are two electric motors in the store which have been bought as spares. The mill manager should consider to return one motor to central stores. 2) EHS Inspection report conducted on 30 September 2019. Mentioned that emergency evacuation body splint/Maintenance Workshop are in full operational condition; Emergency diesel fire fighting generator/Demin Plant are run in full operational condition. <p>Plantation:</p> <p>General Manager Plantation visited estates for the field inspection. A standard report is made to the management of the operating units. The report was being checked and discussed. Estates provide remedial plan/action taken. The report contains:</p> <ul style="list-style-type: none"> - Sections inspected immature, mature, new development. - Action points to be taken before next visit and completion date. - Harvesters productivity / standards - Upkeep standard / Pest & Diseases - RSPO related requirement - Documentation compliance. <p>There are several visit related estate performance conducted to the plantation in 2019, such as:</p> <ol style="list-style-type: none"> 1) Report No.5 from Palm Oil Consulting LTD, date of visit 23-29 June 2019. The report covers yield taking, yield making, Immature/replant and Nursery. In some areas on the lower slopes the lining, palm spacing and countur terrace, path are incorrectly set out, with incorrect gap and and incorrect spacing. 2) Internal Audit Observation report, visit conducted by Internal Audit | |

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| | | <p>Department. Kerakera Division dated 9 August 2019, blocks visited 15K04 and 01L04. Result: FFB stalks are shortened; bunches display is per standard and easy to count; loose fruit collected and bagged.</p> <p>3) Internal Audit Observation report, visit conducted by Internal Audit Department. Kerakera Division dated 10 July 2019, field visited 14 Block 2. Result: FFB lined displayed per standard; block upkeep well maintained, Ibana assisted in pruning; no difference noted on bunch count.</p> <p>4) William Griffith’s Visit to Bakada Plantation on 16 January 2019. Result: there were several Improvement noted, such as 100% access to all palms; amalgamation of spraying and fertilizer gangs; tools and chemical availability improvement noted.</p> <p>5) RSPO P&C 2018 Internal Audit Report of Bakada Plantation, by Martin D., Carol A. and Florence J., dated 3 June 2019.</p> <p>6) Audit Spot Check of Field Standard in Alangily Division, dated visited 21 March 2019, Location Field 2 Block 11C03 and 11C02. Result: Recorders physically confirmed/count FFB at the market place and record; FFB lined up in the market place very well and it’s so easy to confirm; segregation of rooten and good bunches at the market place very well maintained.</p> <p>7) RSPO Pre-Audit Review, provide summary of finding of a review conducted in June 2019 by Murray Feddersen. Result: at Navo Landfill / Medical Waste Incenerator, a significant concern here was the newly excavated scrap metal pit which is within the buffer zone area at the top of the bank of a stream. This must be filled in and a new pit established in an acceptable location. It should be recorded as a nonconformance and corrective action must be include refresher training for all concerned on the importance of maintaining buffer zone. Otherwise, the landfill operation was in good condition as usual.</p> <p>8) Brief Internal Audit Report, audit spot checks on plantation for the month of September 2019 for Navo Estate - Atata Division 1. Visited date 25 September 2019, Block 12J29. Good practice observed: FFB stalks are shorten; buches display is per standard and easy to count;</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>loose fruit collected and bagged.</p> <p>9) William Griffith's Visit to Kiba Plantation, Navo Estate in 18 January 2019. Issue raised: EFB management. Corrective Action: EFB to be dumped in appropriate location following a proper pattern. Application to be uniform in the field and within 3 days after mill processing to increase K intakes. Availability of EFB machines to be improved.</p> <p>10) Fertilisation Visit Report – March 2019. Main observation in the plantation: improve harvesting standards and organize "Zero Tolerance Days" for black bunch harvest; Complete pruning for the palms most affected by wind damage, giving clear work instruction; Sanitize circle to improve loose fruit collection & crop quality; Establish harvesting maps in each plantation and ensure 14 days harvesting round.</p> | |
| | <p>Associated Smallholder Requirement: OPIC and Companies to maintain production records and field day attendance records as evidence of improved performance.</p> | <p>OPIC and HOPL maintain the production record. Field day attendance records were available. This forum is adequate to discuss and train the smallholders organized by the organization. RSPO Pre-Audit Review, provide summary of finding of a review conducted in June 2019 by Murray Feddersen. Result: there have been some changes in Replanting process to better recognise and protect boundaries and buffer zone. The Replanting SOP has not yet been updated to reflect the new process. Recommendation: update and re-issue the Replanting SOP, ensure all required people have it. Provide some training to key people to ensure that there is awareness for the updates. ...</p> | Yes |
| 4.1.3 | <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate</p> <p>- Minor compliance -</p> | <p>All issues highlighted during visits are being monitored by the respective Superior. These are evidenced during the review of reports mainly as shown and sighted in 4.1.1 & 4.1.2 above. Each Mill uses Daily Production Figure for daily monitoring record, it described FFB receiving (todate, month todate and year todate); CPO, PK and PKO produced; Throughput, OER, KER, despatch); CPO & CPKO stock and production quality. Hargy POM Daily Production Figure 30 Sept 2019, as reported on 1 October 2019: FFB IP stock before 3,017.60 tons; FFB received 116.40 tons; FFB</p> | Yes |

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| | <p>processed 339.195 tons; stock carry forward 84.80 tons; processing hour 7.62 hours; mill throughput 44.51 tons/hour; OER 21.23%; CPO produced 72.02 tons; KER 5.23%; PK produced 17.75 tons. CPO stocks before 1,850.98 tons; CPO dispatched 0; CPO stock carry forward 2,175.62 tons; PK stock before 95.19 tons; PK dispatched 0; PK crushed 22.10 tons; PK stock carry forward 90.84 tons.</p> <p>Navo POM Daily Production Figure 27 Sept 2019, as reported on 28 Sepembert 2019: FFB IP stock before 127.35 tons; FFB received 622.46 tons; FFB processed 624.85 tons; stock carry forward 124.97 tons; processing hour 12.45 hours; mill throughput 50.19 tons/hour; OER 23.03%; CPO produced 143.92 tons; KER 4.80%; PK produced 29.99 tons. CPO stocks before 461.88 tons; CPO dispatched 188.70 tons; CPO stock carry forward 417.10 tons; PK stock before 98.13 tons; PK dispatched 41.74 tons; PK stock carry forward 86.38 tons.</p> <p>Independent Consumer Competition Commission (ICCC) has calibrated Hargy Oil Palm Limited weighbridge. For Hargy POM under certificate number ICCC 1701; model JAC 320 NUWEIGH; capacity 60 tonnes; S/N E26209-0212; valid until 21 Jul 2020. For Barema POM weighbridge calibrated based on certificate number ICCC 1702 dated 20 July 2019; model: R 420 RINSTRUM; Capacity: 60 tonnes; S/N 3356199; Graduation interval 0.02 T; Next inspection: 20 July 2020. All measuring equipment such as Electronic Balance, Std Weight, Drying Oven, Incubator, DS Meter, pH Meter, Ultrameter II and Colorimeter have been calibrated based on certificate number BA/NB/19F001 to 19F017 dated 9 June 2019 by UCAL TECH'S (M) SDN BHD. Calibration result all Pass. Certificate number ICCC 1703 for Navo Mill weighbridge model E1110, 60 tons capacity, serial number 114850293. Next inspection on 20 July 2020.</p> <p>Hargy POM Action Plan from Chief's visit: (1) Arrange FFB graders to frequently collect all loose fruits daily from ramp to weighbridge gate to ramp hopper. (2) Arrange workers to inspect and repair defectife door safety latch on the inlet and outlet steriliser door. Hargy POM Action Plan</p> | |

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| | <p>from Director’s visit: (1) relocate outlet of recovery discharge pipe to centre of the distribution tank; (2) will repair with new glass.</p> <p>FFB harvest/pick up schedules vs Harvest/pick up report for Hargy POM area; FFB receipt in Hargy POM: FFB IP Collection Docket No.201596 from Hargy Estate, Urumaili Division, Block 99G02 (53 bunches) and Block 99G03 (150 bunches); dated 2 October 2019. HOPL-Hargy POM weighbridge ticket No.FFB19010548W dated 2 October 2019; lorry No.VH03; Product Fresh Fruit Bunch IP; FFB from Hargy Division 2 Urumaili, Block 99G02 (53 bunches) and Block 99G03 (150 bunches); YOP 1999; nett weight 5.88 tons. FFB IP Collection Docket No.213800 from Hargy Estate, Kerakerai Division, Block 15K02 (908 bunches); dated 02/10/2019. HOPL-Hargy POM weighbridge ticket No.FFB19010549W dated 2 October 2019; lorry No.VH05; Product Fresh Fruit Bunch IP; from Hargy Division 3 Kerakera, Block 15K02 (908 bunches); YOP 2015; nett weight 7.96 tons. HOPL-Hargy POM weighbridge ticket No.FFB19008725W dated 7 August 2019; lorry No.VC17; from Cenaka Division (Farm Gate); Product Fresh Fruit Bunch IP; YOP 2000; nett weight 15.44 tons. HOPL-Hargy POM weighbridge ticket No.FFB19008728W dated 7 August 2019; lorry No.VC07; from Maututu Division (Farm Gate); Product Fresh Fruit Bunch IP; YOP 2000; nett weight 14.18 tons.</p> <p>Barema POM Action Plan from Director’s visit: (1) the bottom plate of FFB conveyor should be extended at leas 200mm, so the FFB falls past the conveyor chain; (2) the operator should do dry cleaning only or use a wet mop, but no use of water hose to clean the floor of the genset room. Action Plan from Chief of Engineering visit: (1) BPOM roofing need to be clean up; (2) sterilizer leakages need to rectifies as soonest; (3) Sterilizer pivot, bearing and cyinder shall be greased.</p> | |

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| | <p>Processing capacity of Barema Mill is 45 tons FFB per hour. There are 4 storage tanks in Barema Mill, 2 for CPO and 2 for CPKO; total tank capacity for CPO is 4,000 MT (@ 2,000 MT) and for CPKO is 1,000 MT (@ 500 MT). Samples of FFB receiving document in Barema POM observed: FFB Receiving Slip #FFBIP19008479W, dated 2 September 2019, origin: Hargy Division Barema 1, Lorry VH12, Product: Fresh Fruit Bunche IP, DO 224396, Remarks S049/F14, Block 07E16; YOP 2007; ABW 18 kg: amount 387 bunches; nett weight 6.70 tons. FFB Receiving Slip #FFBIP19003724W, dated 3 May 2019, origin: Navo Division Kiba 2, Lorry VH23, Product: Fresh Fruit Bunche IP, DO 177876, Remarks SK124/F12, Block 99E14; YOP 1999; ABW 30 kg: amount 540 bunches; nett weight 16.06 tons. FFB Receiving Slip #FFBIP19005212W, dated 2 June 2019, origin: Maututu Division (Farm Gate), Lorry VC16, Product: Fresh Fruit Bunche IP, Trip No.4752, DO 046696-046699, Block Kabaiya; YOP 2000; ABW 30 kg: nett weight 14.88 tons.</p> <p>Sample of CPO despatch document in Barema POM observed: Despatch Slip #CPOIP19000837W, dated 2 October 2019, origin: Barema POM; Receiver: Hargy POM; Lorry VP06; Product Crude Palm Oil IP, DO number BPOMHPOMCPOIP01; nett weight 33.46 tons. Despatch Slip #CPOIP19000840, dated 2 October 2019, origin: Barema POM; Receiver: Hargy POM; Lorry VP06; Product Crude Palm Oil IP, DO number BPOMHPOMCPOIP01; nett weight 33.24 tons.</p> <p>Processing capacity of Navo Mill is 45 tons FFB per hour. There are 3 storage tanks for CPO in Navo Mill, two tank capacities is 2,850 tons each, and other one tank capacity is 500 tons. The Mill has two silo bins for palm kernel with capacity 49 tons each, whilst the hopper capacity is 47 tons. Weighbridge calibrated based on Certificate of Inspection, issued by Independent Consumer Competition Commission dated 20 July 2019. Certificate number ICCC 1703 for Navo Mill weighbridge model E1110, 60 tons capacity, serial number 114850293. Next inspection on 20 July 2020.</p> | |

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| | <p>Samples of FFB receiving document in Navo POM observed: FFB Receiving Slip #FFBIP19013247, dated 2 September 2019, origin: Navo Division Atata 2, Lorry VH06, Product: Fresh Fruit Bunch IP, DO 205290, Remarks fld4/av21-so67, Block 12L21; YOP 2012; ABW 13 kg: amount 808 bunches; nett weight 7.70 tons. FFB Receiving Slip #FFBIP19013230W, dated 31 August 2019, origin: Pandi Division Alaba, Lorry VH30, Product: Fresh Fruit Bunch IP, DO 218771, Remarks fld5/av2-sk117, Block 11B02; YOP 2011; ABW 13 kg: amount 1132 bunches; nett weight 14.62 tons. FFB Receiving Slip #FFBIP19013235W, dated 31 August 2019, origin: Meramera Division (Farm Gate), Lorry VC09, Product: Fresh Fruit Bunch IP, Trip No.4691, DO 3887-38864, Block Meramera; YOP 2000; ABW 27 kg: nett weight 13.60 tons.</p> <p>Sample of CPO and PK despatch document in Navo POM observed: Despach Slip #CPOIP19000934W, dated 31 August 2019, origin: Navo POM; Receiver: Hargy POM; Lorry VP06; Product Crude Palm Oil IP, DO number NPOMHPOMCPOIP; nett weight 33.26 tons. Despach Slip #PKIP19000366W, dated 31 August 2019, origin: Navo POM; Receiver: Barema POM; Lorry VH25; Product Palm Kernel IP, DO number NPOMBPOMPKIP01; nett weight 16.68 tons.</p> <p>Estate operation reported monthly per Division in Agronomic dashboard. The report contains Estate areas (mature, immature); Planting and Replanting; Production (Yield, Harvesting); Nutrient Management (Fertilizer application, Crop residue application); Climatic data; Harvester productivity; Yield Statistic by field; Fertilizer applied; and Pesticides applied.</p> <p>Smallholders: Records of monitoring of any action taken were available under Field Day Record and Block Inspection Report. Production records are maintained under Actual Production (tons) per Weekly Payroll All Division.</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| 4.1.4 | The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance - | Hargy Oil Palms Limited has RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01 dated 28 August 2019, which stated – The entire supply base of the Hargy Oil Palms Limited’s palm oil mills including the independent estates and all smallholders is RSPO-certified. There are no other palm oil mills in the vicinity of the HOPL estates, independent estates and smallholder blocks, to which FFB/LF could be delivered or growers from who FFB could be sourced. In line with the RSPO Supply Chain Certification Standard for CPO mills audit, it has been verified that Hargy POM, Barema POM and Navo POM only received FFB from certified supply base, part of the certification scope. | Yes |
| Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. | | | |
| 4.2.1 | 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 - | HOPL has established and implemented procedures for good agriculture practices in maintaining the soil fertility. The procedures comprises of manual and mechanical inorganic fertilizer application. The procedures are Standard Operating Procedure for Soil Sampling in HOPL Plantations and Standard Operating Procedure for Inorganic Fertilizer in HOPL Plantations. Inclusive is the organic fertilizer through Empty Fruit Bunches (EFB) application and estates whereby the land application is in practice. HOPL use fertilizer recommendation issued by OPRA as guidance to maintain soil fertility. Samples of recommendation observed are: - Barema 1 Plantation: Field 14; YOP 2007; Dose Urea-1 0.6 kg/palm; Urea-2 0.6 kg/palm; Urea-3 0.6 kg/palm; Kieserite 0.5 kg/palm. - Hargy 3 Plantation: Field 14; YOP 2009; Dose Urea-1 0.5 kg/palm; Urea-2 0.5 kg/palm; Urea-3 0.5 kg/palm; DAP-1 1.0 kg/palm; DAP-2 1.0 kg/palm; Kieserite 0.5 kg/palm. - Karla 1 Plantation: Field 2; YOP 2014; Dose Urea-1 0.7 kg/palm; Urea-2 0.7 kg/palm; Urea-3 0.7 kg/palm;. - Ibana 1 Plantation: Field 17; Replant 2022; YOP 2001; Dose Urea-1 0.6 kg/palm; Urea-2 0.6 kg/palm; Urea-3 0.6 kg/palm; DAP 0.8 kg/palm; MOP 1.5 kg/palm. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | | <ul style="list-style-type: none"> - Alaba Plantation: Field 5; A Blocks; YOP 2011; Dose Urea-1 0.6 kg/palm; Urea-2 0.6 kg/palm; Urea-3 0.6 kg/palm; Kieserite 0.5 kg/palm. - Abulmosi Plantation: Field 1; YOP 2013; Dose Urea-1 0.5 kg/palm; Urea-2 0.5 kg/palm; Urea-3 0.5 kg/palm; DAP 0.5 kg/palm; DAP 1.0 kg/palm; MOP 0.5 kg/palm. - Alangili Plantation: Field 1; YOP 2011; Dose Urea-1 0.6 kg/palm; Urea-2 0.6 kg/palm; Urea-3 0.6 kg/palm. - Gamupa Plantation: Field 1,2,3,4; YOP 2014; Dose Urea-1 0.6 kg/palm; Urea-2 0.6 kg/palm; Urea-3 0.6 kg/palm. - Vamakuma Plantation: Field 1,2,3; YOP 2013; Dose Urea-1 0.5 kg/palm; Urea-2 0.5 kg/palm; Urea-3 0.5 kg/palm; DAP 0.5 kg/palm. <p>Based on OMP Report August 2019, fertilizer recommendation in Alangili Division (295.7 ha) todate August 2019 are 7 tons of DAP; 25 tons of Kieserite and 43 tons of Urea. In Alaba Division (928 ha) todate August 2019 are 63 tons of DAP; 2 tons of Fertibor 25 kg; 15 tons of Kieserite; 62 tons of MOP and 129 tons of Urea.</p> | |
| | <p>Associated Smallholder Requirement:</p> <p>Associated Smallholders to implement good agriculture practices as communicated through extension services delivered by OPIC and Company Smallholder departments.</p> | <p>During the smallholder field assessment, the assessment team had observed that the smallholders are implementing good agriculture practices in maintaining soil fertility. Fronds from the palm are being stacked as thought by OPIC and HOPL. The fertilizer application are being done as thought by OPIC and HOPL.</p> <p>The fertiliser program for the smallholders are also available however not as in the same parameter as practiced in the estate plantation. Mainly fertilizers are applied once/year for 4 years old palms and above. The commonly type of fertilizers applied in Smallholders are Urea. Fertilizer rates are determined by field trials assisted by OPRA (Oil Palm Research Association). Briefing on the method of application is explained during the extension meeting or during field day.</p> | Yes |
| 4.2.2 | Records of fertiliser inputs shall be maintained. | Records for fertilizer application are available and maintained under Fertilizer Booklet and OMP (Oil Palm Management Practice) Report. During the audit the following fertilizer application was captured on random basis. | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|------------|
| <p>- Minor compliance -</p> | <p>Sample observed in Hargy Estate, Division 3 (Kerakera Plantation) application month in August 2019: Type DAP rate 0.25 kg/palm, 27 ton; Fertibor 25 kg at 0.02 kg/palm, 2 ton; Kieserite at 0.62 kg/palm, 67 ton; MOP at 0.35 kg/palm, 38 ton; Urea at 0.81 kg/palm, 88 ton. EFB at 768 ton manual and 185 ton mechanic. It was also available fertiliser audit – spot check form and mature palm fertiliser placement. Agronomist spot check form site information, application, method, dosage, calibration, PPE, comments.</p> <p>In Navo Estate; Based on OMP Report August 2019, fertilizer applied in Atata 2 Division (1,274.5 ha) todate August 2019 are 8 tons of DAP (mechanic); 53 tons of DAP (man); 24 tons of NP blend; 155 tons of Urea. Fertilizer applied in Atata 1 Division todate August 2019 are 28 tons of DAP; 64 tons of Kieserite; 55 tons of Urea.</p> <p>In Pandi Estate; Based on OMP Report August 2019, fertilizer applied in Alangily Division (295.7 ha) todate August 2019 are 14 ton of DAP; 12 ton of Kieserite; 22 ton of Urea and 30 ton of EFB. In Alaba Division (928 ha) todate August 2019 are 58 tons of DAP; 2 tons of Fertibor 25 kg; 17 tons of Kieserite; 58 tons of MOP and 78 tons of Urea.</p> <p>During the audit, visit to fertilizer activity were conducted to Hargy Estate-Kerakera Plantation, Area 11, Block 15K06. All workers can demonstrate good practice in fertilizing activity according to correct time, type, dosage and object. PPE were used, e.g. gum boots, apron, hand gloves and dust mask. It shows that all worker are well trained.</p> | |
| <p>Associated Smallholder Requirement: OPIC and/or Company Smallholder Departments to maintain records of fertiliser distribution.</p> | <p>For smallholders; the fertilizer distribution database is kept by Communities Affair office. Records of fertilizer applied in the smallholders as maintained by HOPL recorded by the Agronomist.</p> <p>Examples of Fertilizer Urea Delivery Sheet</p> | <p>Yes</p> |

| Criterion / Indicator | | Assessment Findings | | | | | | Compliance |
|-----------------------|--|---|---------------|--------------|----------------|------------|------------|------------|
| | | Date | Name | Block Number | Invoice Number | No of Bags | Total Cost | |
| | | 18/09/2019 | Andrew Kepu | 390101 | 34863 | 4 | K240.00 | |
| | | 20/09/2019 | Martin Tevang | 390016 | 37464 | 8 | K480.00 | |
| | | 14/08/2019 | Flesian Yumbu | 031364 | 24435 | 16 | K960.00 | |
| | | 03/09/2019 | Eric Wau | 11344 | 32453 | 12 | K720.00 | |
| 4.2.3 | <p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.</p> <p>- Minor compliance -</p> | <p>HOPL practices periodic tissue and soil analysis. The periodic tissue and soil sampling carried out by Applied Agricultural Resources Sdn. Bhd. Tissue sampling is taken on annual basis prior to the manuring program being established. Guidelines are available in the "GUIDELINE FOR OIL PALM TISSUE SAMPLING IN HOPL PLANTATIONS". Therein is shown:</p> <p>Introduction/Background; Identifying a frond to sample/identifying each leaf; Leaf sampling/sampling methodology/leaf sampling density; Leaf sample processing; Frequency & timing; Deficiency symptoms.</p> <p>A report on the leaf analysis results 2019 was sighted. Results of analysis for APPLIED AGRICULTURAL RESEARCH SDN BHD. Dami research station. Elements traced are ash, N, P, K, Mg, Ca and B. These results will be further used for the development of fertilizer recommendations. Observed evident dated Foliar Analysis Result dated 15 August 2019, e.g. Lab reference PC19/PNGHOPL 3; sample reference HAR F14 LSU2 0519; major element results 14.83% Ash; 2.43% N; 0.146% P; 0.69% K; 0.18% Mg; 1.00% Ca; minor element results 18.0 ppm B; 0.39% Cl.</p> <p>Observed evident Foliar Analysis Result dated 21 August 2019, e.g. Lab reference PC19/PNGHOPL 34; sample reference ATA 2 F03 0319; major element results 13.83% Ash; 2.63% N; 0.154% P; 0.61% K; 0.27% Mg; 1.01% Ca; minor element results 13.3 ppm B; and 0.41% Cl.</p> <p>The company demonstrated Certificate of Analysis for soil samples issued by Hill Laboratories, New Zealand. Example seen: Lab. No. 2196835 dated 4 July 2019; sample name: HarF07 FP 20-40; sample type: Soil Oil Palm</p> | | | | | | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | (S73). Analysis result: pH 6.4; Olsen Phosphorus 4 mg/L; Anion Storage Capacity 97%; Potassium 0.10me/100g; Calcium 4.4 me/100g; Magnesium 0.40 me/100g; Sodium 0.10me/100g; CEC 12 me/100g; total base saturation 44%; volume weight 0.85g/mL; Organic matter 7.0%; total carbon 4.1%; total Nitrogen 0.42% C/N ration 9.6; total phosphorus 464mg/kg. | |
| | <p>Associated Smallholder Requirement:</p> <p>Oil Palm Research Association (OPRA) to take tissue samples from representative Associated Smallholders annually.</p> | <p>Smallholder: PNG Oil Palm Research Association (OPRA) annually conducted Tissue sample analysis. Samples taken from representative associated smallholders. Record of last year tissue sample analysis was evident based on email from PNG OPRA to Cellia Goethals on 25 May 2018. Sample taken was 64 units.</p> <p>Below are samples of analysis result: Analytical code BIA-SH-WIL-1188-0518L; Sub Division Wilelo; Scheme LSS; Block 021188; result: ash; 1.98% N; 0.12% P; 0.71% K; 0.25% Mg; 0.9% Ca; 18.6 mg/kg B; 0.3% Cl. Analytical code BIA-SH-MAT-1743-0518L; Sub Division Matililiu; Scheme VOP; 171743; result: ash; 2.16% N; 0.13% P; 0.78% K; 0.21% Mg; 1.0% Ca; 20.6 mg/kg B; 0.2% Cl.</p> | Yes |
| 4.2.4 | <p>A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.</p> <p>- Minor compliance -</p> | <p>There are records of EFB and expeller application being applied in the fields for the respective estates. Monitoring is being made for the actual quantity applied vs the budget and also the cost incurred on monthly & yearly basis both absolute and unit cost/MT FFB and unit cost /Ha. The rate of EFB application is 35 - 40 MT/Ha. Sighted EFB application at Hargy Estate - Kerakera Plantation. Long distant estate e.g Pandi do not have EFB application due to the distance factor coupled with the non-availability of machine i.e EFB spreader.</p> <p>EFB application was recorded in Crop Residue Application and Monthly Agronomic Dashboard. Records of EFB application in 2019 was sighted. For example in Hargy Estate, Kerakera Plantation, in August 2019, number of application is EFB at 768 ton manual and 185 ton mechanic. In Pandi</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|------------|-----------|----------------|----------|----|---|----------|-------|-----|----------|-------|---|--------|-----|---|---------|-------|-------|---------|-------|---|---------|-----|---|--------|-------|---|--|
| | | <p>Estate, Bakada Plantation, Alangily Division applied 30 ton of EFB for todate August 2019.</p> <p>Based on Fertilizer applied in OMP Report: Agronomic Dashboard, EFB applied in HOPL Plantation for 2019 todate August are as follows:</p> <table border="1"> <thead> <tr> <th>Division</th> <th>EFB (ton)</th> <th>Expeller (ton)</th> </tr> </thead> <tbody> <tr> <td>Alangily</td> <td>30</td> <td>-</td> </tr> <tr> <td>Barema 1</td> <td>6,771</td> <td>616</td> </tr> <tr> <td>Barema 2</td> <td>1,036</td> <td>-</td> </tr> <tr> <td>Gamupa</td> <td>105</td> <td>-</td> </tr> <tr> <td>Hargy 1</td> <td>8,024</td> <td>2,544</td> </tr> <tr> <td>Hargy 2</td> <td>7,953</td> <td>-</td> </tr> <tr> <td>Hargy 3</td> <td>953</td> <td>-</td> </tr> <tr> <td>Kiba 1</td> <td>9,470</td> <td>-</td> </tr> </tbody> </table> <p>For smallholders, there is no EFB and POME applied in smallholder area. Smallholders uses palm residue after replanting and stacked palm fronds (frond stacking) as additional source of nutrient. This is a common practice in the oil palm industry.</p> | Division | EFB (ton) | Expeller (ton) | Alangily | 30 | - | Barema 1 | 6,771 | 616 | Barema 2 | 1,036 | - | Gamupa | 105 | - | Hargy 1 | 8,024 | 2,544 | Hargy 2 | 7,953 | - | Hargy 3 | 953 | - | Kiba 1 | 9,470 | - | |
| Division | EFB (ton) | Expeller (ton) | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Alangily | 30 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Barema 1 | 6,771 | 616 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Barema 2 | 1,036 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gamupa | 105 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hargy 1 | 8,024 | 2,544 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hargy 2 | 7,953 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hargy 3 | 953 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kiba 1 | 9,470 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Criterion 4.3 Practices minimise and control erosion and degradation of soils.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.3.1 | <p>Maps of any fragile soils shall be available.</p> <p>- Major compliance -</p> | <p>Topography map of Bialla Project 2017, scale 1:115,000, dated June 2017. The map consist of Hargy Plantation, Barema Plantation, Karla Plantation, Ibana Plantation, Bakada Plantation, all smallholders and all Mills.</p> <p>Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, Hargy Pit 1 Soil description was as follows: Parent material: Volcanic alluvial materials; Landform: Alluvial plain on foot slope; Slope: Flat; Previous land use: Logged forest;</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <p>Vegetation: Logged secondary forest; Surface features: Thick litter layer and no outcrops, deep water trench common feature; Groud cover: good ground cover with forest under growth; Soil drainage: well drained; Comments: there were no stones and gravel found throughout the profile, there were orange inclusions at 150-200 cm depth; Description: Brown (10YR 4/3); sandy clay loam; friable; weakly developed fine-medium sub angular blocky structure; slightly sticky; plastic; many fine pores; rapid porosity; many fine and medium and few coarse roots, diffuse boundary to.</p> <p>Below are detail of soil type in HOPL: Yanaswali Plantation – Vamakuma Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:16,950. ± 90% is Sandy clay loam; 10 % is River gravel. Yanaswali Plantation – Sena Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:17,200. 100 % is loamy sand/gravel. Bakada Plantation – Magalona Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:20,230. ± 65% is loamy sand/gravel; ± 35 % is loamy sand. Karla Plantation Soils. Scale 1:40,200. Surface soil texture: ± 70% is sand to loamy sand, ± 20% is loam to sandy loam, 10% is heavy loam to sand clay loam. Ibana Plantation Soils, Scale 1:37,440. Surface soil texture: 100% is sand to loamy sand. Hargy Plantation Soils. Surface soil texture: sand to loamy sand (15%), heavy loam to sand clay loam (68%), clay loam to silty clay loam (5%), No data (10%), organic loam to sandy clay loam (2%). Barema Plantation Soils. Surface soil texture: silty clay (70%), organic loam to sand clay loam (15%), clay loam to silty clay loam (15%). Bakada Plantation - Alangily Soils, scale 1:26,590. Surface soil texture: sandy loam (90%), loamy sand (10%).</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | <p>Bakada Plantation – Alaba Soils, scale 1:31,110. Surface soil texture: loamy sand/gravel (80%), loamy sand (20%).</p> <p>Bakada Plantation – Abulmosi soils, scale 1:25,290. Surface soil texture: loamy sand/gravel (90%), loamy sand (10%).</p> | |
| 4.3.2 | <p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).</p> <p>- Minor compliance -</p> | <p>The practices adopted by the management; Frond stacking along the frond path to be arranged in neat and organised manner; Sustainability of ground covers/soft grasses to minimise soil erosion and surface run off; During field visit at Hargy Estate – Kerakera plantation and Pandi Estate – Bakada Plantation, the visited area are flat.</p> <p>Based on the Slope map of Hargy Estate, Navo Estate and Pandi Estate scale 1:41,000, the slope class is dominated < 5 degrees slope. Average slope area in Kerakera plantation is < 5 degrees (dominated); 5-10 degrees (spreads in southern side); 10-15 degrees (particular area in Souther side). Average slope area in Bakada plantation is < 5 degrees (dominated); 5-10 degrees (spreads in Western side); 10-15 degrees (particular area in Western side). Average slope area in Atata plantation is < 5 degrees (dominated); 5-10 degrees (spreads in Eastern side); 10-15 degrees (particular area in Eastern side).</p> <p>During field visit at Kerakera plantation in Block 97J04 and 15K06; Bakada Plantation Block 11C02 and 11B02; Atata Plantation Block Q24 and 00O21 verified in flat area (< 5 degrees), whilst in Kerakera Plantation Block 01L01 is verified on small slope area border with buffer zone (10-15 degrees slope). The palm trees of Block 01L01 were planted in 2001; the strategy to prevent run-off and soil erosion is by implement frond stacking and maintain the cover crops. Soil condition in this area is volcanic soil which fragile. Based on field observation in Kerakera plantation in Block 15K06; Bakada Plantation Block 11C02 and 11B02 the oil palms are very well covered with legume cover crops (Pureira javanica and Calopogonium mucunoides). The plantation management implement terracing in Block 12B09 Div. 1 (Alaba) to avoid soil erosion and maintain the cover crops as well.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | <p>Associated Smallholder Requirement:</p> <p>Associated Smallholders not to plant on unsuitable slopes. OPIC and Companies to advise on slope suitability after consideration of gradient, soil type, harvesting safety and other relevant issues.</p> | <ul style="list-style-type: none"> - No.021088 – Sira Doang: flat area, frond stacking maintained; weeds controlled by slashing and spraying; - No.021066 – Mitiro Salabung: flat area, frond stacking maintained; weeds controlled by slashing; buffer zone with forest maintained; - No.021107 – Naunigi Tugute: flat area; in block have seasonal creek, buffer zone with creek maintained; - No.021188 – Max Buson: the area with slope, implement frond stacking and ground cover; - No.021474 – Ronny Walakawi: buffer zone with forest maintained; - No.040680 – Mike Lopese: in block have seasonal creek named Wala, boundary are maintained; - No.350060 – Dimon Luma: buffer zone with forest maintained; weeds control: 100% slashing; - No.171729 – Elias Toluba: buffer zone with forest maintained; weeds control: 100% slashing; - No.171743 – Toruga Dale: buffer zone with forest maintained; weeds control: 100% slashing; - No.171783 – Matilda M. Palik: the area with slope, implement frond stacking and ground cover; - No.040402 – Joe Suka: flat area; weeds controlled by slashing; frond stacking maintained; - No.040415 – Jacob Movuta: flat area; weeds controlled by slashing; frond stacking maintained; - No.040409 – Vitolo Mera: flat area; weeds controlled by slashing; frond stacking maintained; - No.040415 – Jacob Movuta: flat area; weeds were well controlled by slashing; frond stacking maintained; - No.040748 – Susan Daipo: flat area; weeds controlled by slashing; frond stacking maintained; buffer zone with forest maintained; | Yes |
| 4.3.3 | A road maintenance programme shall be in place. | HOPL has established “Hargy Road Fleet Services 2019” completed with maps as road maintenance program. Activities consist of: | Yes |

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| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|------------|-------------|------------|---------|----------------------|-------|---------|----------------------|------|---------|------------------|-------|---------|-----------------|------|---------|----------------|------|---------|----------------|-------|---------|----------------|------|---------|-----------------|-------|--|
| <p>- Minor compliance -</p> | <p>Road Patrol Grading & Spot Graveling (Grader, Roller & Water Truck); New Road – Forming & Surfacing/Graveling; Potholes Patching – pot holes patching on sealed and unsealed roads; Darinage & Culverts – culverts installation/repairs and waterway (river training); Other works: include emergencies repair works, bridges, building/ structures, RSPO, Topsoil/seedling cartages.</p> <p>Record seen: "Vehicle Allocation Road Fleet – August Vehicle Recovery Journal 2019". Detail vehicle uses for road maintenance are as follows:</p> <table border="1" data-bbox="1115 722 1733 970"> <thead> <tr> <th>Fleet Reg.</th> <th>Description</th> <th>Hours used</th> </tr> </thead> <tbody> <tr> <td>KAI 645</td> <td>L127 Sino Dump Truck</td> <td>103.5</td> </tr> <tr> <td>KAI 640</td> <td>L128 Sino Dump Truck</td> <td>93.0</td> </tr> <tr> <td>KAF 016</td> <td>CL01 Isuzu Truck</td> <td>119.5</td> </tr> <tr> <td>KAE 401</td> <td>L80 Water Truck</td> <td>29.5</td> </tr> <tr> <td>BEE 159</td> <td>E75 CAT Grader</td> <td>30.5</td> </tr> <tr> <td>BDF 628</td> <td>E61 CAT Grader</td> <td>126.5</td> </tr> <tr> <td>BDI 952</td> <td>E65 CAT Roller</td> <td>76.0</td> </tr> <tr> <td>BEO 806</td> <td>E83 CAT Backhoe</td> <td>168.5</td> </tr> </tbody> </table> <p>For road repair, Construction and Fleet Department works based on Integrated Stock and Works Requisition. Example: requisition from Hargy Plantation No.737133 dated 2 August 2019, for use of Backhoe in Hargy Division 2 Urumaili. Requisition No.740717 from Hargy Plantation Division 1 Makakiwa dated 29/08/2019 for Load of Gravel (River) CCID #17A07R, quantity: 25 m3.</p> <p>Some works performed by external contractor, such as Excavator rent. Evident seen: Purchase Order No.HOPL035914 dated 15 January 2019, to Timduka Ldoim Limited. Item description: Hire of excavator to load gravel onto dump trucks; Account No.64149020; total item 2,000 m3.</p> | Fleet Reg. | Description | Hours used | KAI 645 | L127 Sino Dump Truck | 103.5 | KAI 640 | L128 Sino Dump Truck | 93.0 | KAF 016 | CL01 Isuzu Truck | 119.5 | KAE 401 | L80 Water Truck | 29.5 | BEE 159 | E75 CAT Grader | 30.5 | BDF 628 | E61 CAT Grader | 126.5 | BDI 952 | E65 CAT Roller | 76.0 | BEO 806 | E83 CAT Backhoe | 168.5 | |
| Fleet Reg. | Description | Hours used | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KAI 645 | L127 Sino Dump Truck | 103.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KAI 640 | L128 Sino Dump Truck | 93.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KAF 016 | CL01 Isuzu Truck | 119.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KAE 401 | L80 Water Truck | 29.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BEE 159 | E75 CAT Grader | 30.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BDF 628 | E61 CAT Grader | 126.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BDI 952 | E65 CAT Roller | 76.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BEO 806 | E83 CAT Backhoe | 168.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Associated Smallholder Requirement:</p> | <p>Road maintenance program for Smallholder's area is made together with the company schedule. Hargy Oil Palms Ltd. 2019 Road Maintenance &</p> | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | OPIC and/or Company Smallholder Departments to maintain records of road maintenance. | Construction Plan. For road repair, Construction and Fleet Department works based on Integrated Stock and Works Requisition. Example: requisition from Hargy Plantation No.737133 dated 2 August 2019, for use of Backhoe in Hargy Division 2 Urumaili. Requisition No.740717 from Hargy Plantation Division 1 Makakiwa dated 29 August 2019 for Load of Gravel (River) CCID #17A07R, quantity: 25 m3. | |
| 4.3.4 | Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Major compliance - | During field visit in Kerakera plantation, it is clearly that no peat soils for the entire area. During field visit in Ibana and Bakada plantation, there is no peat soil found. The entire soil in this area is volcanic soil and it's fragile. Based on field visit and interview with associated smallholder, there is no oil palm planted on peat soil. All associated smallholder planted on volcanic and mineral soil. | Yes |
| 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 - | During field visit in Kerakera, Ibana and Bakada plantation, it is clearly that no peat soils for the entire area. In Ibana and Bakada the soil in this area is volcanic soil. Based on field visit and interview with associated smallholder, there is no oil palm planted on peat soil. All associated smallholder planted on volcanic and mineral soil. | Yes |
| 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 - | The certificate holder has had management strategy for fragile and problem soils and it is stated in the SOP for New Development No.PRO-ESD-GEN-001-10, issue No.10, dated 15 April 2018. It is mentioned on page 3: Consideration for New Planting Procedures Soil Surveys & Topographic Information Extensive planting on steep terrain, and/or on marginal soils, is avoided. The requirements are: Where limited planting on fragile and marginal soils is proposed, plans (including maps) shall be developed and implemented to protect soils thus minimising adverse environmental and social impacts. Avoid planting on slope in excess of 25° slope. Avoid planting on contiguous areas of peat soils > 3m deep and > 150 ha in extent. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| | | <p>Soil surveys and topography information are used for site planning the establishment of new plantings, and the results are incorporated into plans and operations. Requirements are:</p> <p>Soil suitability map or soil surveys adequate to established the long-term suitability of land for oil palm cultivation should be available.</p> <p>Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure should be available.</p> <p>During field observation at Bakada and Atata plantation, the entire estate area is flat (0 – 5 degrees) and small sloping (5 – 10 degrees). The strategy to maintain the soil that been conducted by the plantation is mulching by EFB. Based on field visit at Kerakera Plantation Block 01L01 and Atata Plantation Block 00O21, the frond stacking and EFB mulching are applied on the field.</p> <p>EFB application recorded in Hargy Estate, Division 3 (Kerakera Plantation) application in August 2019 are 768 ton manual and 185 ton mechanic. In Pandi Estate Alangily Division (295.7 ha) todate August 2019 are 30 ton of EFB.</p> | |
| <p>Criterion 4.4 Practices maintain the quality and availability of surface and ground water.</p> | | | |
| <p>4.4.1</p> | <p>An implemented water management plan shall be in place. - Minor compliance -</p> | <p>HOPL had a detailed Water Management Plan with latest issue No.8 dated on 7 February 2019 approved by The General Manager. The Water Management Plan guide the company's:</p> <ul style="list-style-type: none"> Water supply, use and discharge; Mitigation against negative impacts; Prevention and mitigation of pollutan incidents; While proactively conserving water in all its activities. <p>The purposes of water management plan are to ensure:</p> <ul style="list-style-type: none"> a) all water complies with legal requirement; b) water is used efficiently; | <p>Yes</p> |

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| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|-----------------|-----------------------|--------------------|-------------|--------------------|-------------|---------------------------|-----------------|-----------------|----------------|-------------|---------------------|-----------------|----------------|----------------|------------|-------------------------|-----------------|------------------|-----------------|--|
| | <p>c) water quality of surface and ground water is maintained.</p> <p>The water management plan includes the use for mill processes, workshop, pesticide mixing and use, domestic use and compound use. Therein is also indicated the water discharged is monitored for BOD and COD. All POME are treated within legal limit as per PNG Code of Practice for POM. HOPL main source of water extraction is from 2 sources i.e surface water and ground water. The surface extraction is from the river systems within the company estates i.e. Sabalbala River, Ibane River, Area 7 and Vamakuma. The underground water is pumped using bore pumps extracted at locations of Hargy mill & compound, Makakiwa Division 1, Barema Estate & Mill and Urumaili Division 2.</p> <p>Permit for such extraction is obtained to comply with Section 65 of the Environment Act 2000.</p> <table border="1" data-bbox="1115 866 1904 1129"> <thead> <tr> <th>Permit No</th> <th>Site & Grid Reference</th> <th>Issue date</th> <th>Expiry date</th> <th>Quantity Specified</th> </tr> </thead> <tbody> <tr> <td>WE-L2B(166)</td> <td>Mengen/Bakada Portion 733</td> <td>9 November 2009</td> <td>9 December 2034</td> <td>34,560 m3/year</td> </tr> <tr> <td>WE-2LB(209)</td> <td>Barema Portion 2038</td> <td>9 December 2010</td> <td>7 January 2035</td> <td>34,476 m3/year</td> </tr> <tr> <td>WE-2LB(80)</td> <td>Ibane river Portion 624</td> <td>11 January 2001</td> <td>31 December 2053</td> <td>227,520 m3/year</td> </tr> </tbody> </table> <p>Usage: Domestic use at compound; Domestic use at compound and Mill use; Domestic use at compound and Nursery Irrigation.</p> <p>According to environmental permit and PNG Environmental Code of Practice 2013, there is parameters required to measuring/testing on TSS parameter from effluent discharge, as follows:</p> | Permit No | Site & Grid Reference | Issue date | Expiry date | Quantity Specified | WE-L2B(166) | Mengen/Bakada Portion 733 | 9 November 2009 | 9 December 2034 | 34,560 m3/year | WE-2LB(209) | Barema Portion 2038 | 9 December 2010 | 7 January 2035 | 34,476 m3/year | WE-2LB(80) | Ibane river Portion 624 | 11 January 2001 | 31 December 2053 | 227,520 m3/year | |
| Permit No | Site & Grid Reference | Issue date | Expiry date | Quantity Specified | | | | | | | | | | | | | | | | | | |
| WE-L2B(166) | Mengen/Bakada Portion 733 | 9 November 2009 | 9 December 2034 | 34,560 m3/year | | | | | | | | | | | | | | | | | | |
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| Criterion / Indicator | | Assessment Findings | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|---|-----------|------------------|----------------------------|----|-----|-----|-----|-----------|----------|-----|---|---|--------------|-----------|-----------|------------------|------|-----|----------------|---------|---------|---------------------|-------------|----------|----------------|-------------|----------|--|--|
| | | <table border="1"> <thead> <tr> <th>Parameter</th> <th>Land Application</th> <th>Discharge to Surface Water</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>5-9</td> <td>5-9</td> </tr> <tr> <td>BOD</td> <td>4000 mg/L</td> <td>100 mg/L</td> </tr> <tr> <td>COD</td> <td>-</td> <td>-</td> </tr> <tr> <td>Total Solids</td> <td>3000 mg/L</td> <td>1500 mg/L</td> </tr> <tr> <td>Suspended Solids</td> <td>1000</td> <td>500</td> </tr> <tr> <td>Oil and Grease</td> <td>50 mg/L</td> <td>50 mg/L</td> </tr> <tr> <td>Ammoniacal Nitrogen</td> <td>Not defined</td> <td>150 mg/L</td> </tr> <tr> <td>Total Nitrogen</td> <td>Not defined</td> <td>200 mg/L</td> </tr> </tbody> </table> <p>The Certificate Holder maintain the quality of mill wastewater/effluent discharge to natural watercourse by sending sample to accredited laboratory to be analyse. BOD and COD is the parameters that strictly to be monitor by the Mills, prior to discharge.</p> <p>TSS result from all mills (Hargy, Barema and Navo) prior to discharge is under required threshold (< 500 mg/L). During field observation on Kimbe bay (Hargy Mill), Ibane river (Barema Mill) and Pandi river (Navo Mill), water quality on ocean/rivers are very clean. Because soil type in this area is mostly volcanic soil, there is no clay/sandy soil therefore TSS level is low.</p> | Parameter | Land Application | Discharge to Surface Water | pH | 5-9 | 5-9 | BOD | 4000 mg/L | 100 mg/L | COD | - | - | Total Solids | 3000 mg/L | 1500 mg/L | Suspended Solids | 1000 | 500 | Oil and Grease | 50 mg/L | 50 mg/L | Ammoniacal Nitrogen | Not defined | 150 mg/L | Total Nitrogen | Not defined | 200 mg/L | | |
| Parameter | Land Application | Discharge to Surface Water | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| pH | 5-9 | 5-9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BOD | 4000 mg/L | 100 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COD | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Solids | 3000 mg/L | 1500 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Suspended Solids | 1000 | 500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oil and Grease | 50 mg/L | 50 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ammoniacal Nitrogen | Not defined | 150 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Nitrogen | Not defined | 200 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.2 | <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to PNG Conservation and Environment Protection Authority (CEPA) requirements and other applicable guidelines) shall be demonstrated. For Smallholders, the status quo shall be maintained where it can be demonstrated that environmental damage is not being caused.</p> <p>- Major compliance -</p> | <p>Refer to C.5.3 related water result discharge to ocean/watercourse for Hargy Mill. Based on field observation at Hargy Mill, the wastewater from effluent pond is discharge straight to the Bismarck ocean/Kimbe bay. The GPS coordinate for discharge point is located at Lat: 5° 18' 42.55" S; Lon: 151° 0' 30.63" E. This coordinate is appropriate with the coordinate given under Environment Act 2000 (No: WD-L2 (56), dated 13 October 1993, validity: 25 years, expiry 31 December 2028).</p> <p>Protection of watercourse (ocean) related POME from Hargy Mill is by monitoring of final wastewater quality that tested by Analysis Laboratory Unitech Development & Consultancy Pty Ltd, PNG (registered under PNGLAS) in monthly basis. Based on field observation on several conservation area, the buffer zone has a long distance from plantation area (around 150 m).</p> | | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|------------|
| | <p>The management has own procedure to protect the watercourse, and it is well implemented. Using the water for Mill and Plantation sourced from Ibane river. The management has a permit of water usage (Permit No. WE-2LB(80) issued on 11 January 2001, valid until 31 December 2053), Quantity specified (227,520 m3/year). Domestic usage at compounds and Nursery irrigation; Source: underground spring water. The Certificate Holder has s procedure to protect the conservation area which including protect the watercourse. Conservation Areas SOP (PRO-ESD-GEN-018, issued 30 June 2018).</p> <p>There is one river (Pandi river) were located in the eastern of the plantation (Div. 2 – Alangily). This river flows from south (Mount Ulawun) to north (Bismarck sea). Conservation area has delineated as riparian zone to protect the watercourse, including stream that cross the plantation area. The condition of buffer/riparian zone is well managed.</p> | |
| <p>Associated Smallholder Requirement: Smallholders must protect water courses and wetlands by not polluting with rubbish or other waste.</p> | <p>Associated smallholder maintain boundary to seasonal creek and area with slope: No.021088 – Sira Doang: flat area, frond stacking maintained; weeds controlled by slashing and spraying; No.021066 – Mitiro Salabung: flat area, frond stacking maintained; weeds controlled by slashing; buffer zone with forest maintained; No.021107 – Naunigi Tugute: flat area; in block have seasonal creek, buffer zone with creek maintained; No.021188 – Max Buson: the area with slope, implement frond stacking and ground cover; No.021474 – Ronny Walakawi: buffer zone with forest maintained; No.040680 – Mike Lopese: in block have seasonal creek named Wala, boundary are maintained; No.350060 – Dimon Lume: buffer zone with forest maintained; weeds control: 100% slashing; No.171729 – Elias Toluba: buffer zone with forest maintained; weeds control: 100% slashing; No.171743 – Toruga Dale: buffer zone with forest maintained; weeds control: 100% slashing;</p> | <p>Yes</p> |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | |
|-----------------------|--|--|------------|----------|----------|----------|----------|--|--|--|--|--|-----|
| | | <p>No.171783 – Matilda M. Palik: the area with slope, implement frond stacking and ground cover; No.040402 – Joe Suka: flat area; weeds controlled by slashing; frond stacking maintained; No.040415 – Jacob Movuta: flat area; weeds controlled by slashing; frond stacking maintained; No.040767 – Andrew Lalou: flat area; weeds were not controlled; frond stacking not maintained; No.040409 – Vitolo Mera: flat area; weeds controlled by slashing; frond stacking maintained; No.040415 – Jacob Movuta: flat area; weeds were well controlled by slashing; frond stacking maintained; No.040748 – Susan Daipo: flat area; weeds controlled by slashing; frond stacking maintained; buffer zone with forest maintained; No.040610 – John Tabari: flat area; weeds were not controlled; buffer zone with forest maintained;</p> <p>Based on interview with smallholders, they all have been disseminated during field visit, they all understood about water course protection. No rubbish or other waste can be disposed to water course.</p> | | | | | | | | | | | |
| 4.4.3 | <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).</p> <p>- Minor compliance -</p> | <p>Hargy POM have POME treatment ponds, using anaerobic treatment, before final discharge to sea. The capacity of the POME ponds: Pond 1: 30 x 17.5 x 1.8 m = 945 m3 (cooling) Pond 2: 30 x 16.5 x 1.2 m = 594 m3 (cooling) Anaerobic Pond 3: 124.5 x 29 x 4 m = 14,442 m3 (retention 13 days) Anaerobic Pond 4: 3 x (102.2 x 20 x 4 m) = 24,528 m3 (retention 22 days) Anaerobic Pond 5: 2 x (102.2 x 20 x 4 m) = 16,352 m3 (retention 15 days) Anaerobic Pond 6: 136 x 32.5 x 4 m = 17,680 m3 (retention 16 days)</p> <p>The POME quality was monitored on monthly basis from National Analytical & Testing Services Ltd., Lae, Morobe Province in PNG. Hargy Mill's POME quality from final discharge</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Feb 2019</th> <th>Mar 2019</th> <th>Apr 2019</th> <th>May 2019</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | Parameter | Feb 2019 | Mar 2019 | Apr 2019 | May 2019 | | | | | | Yes |
| Parameter | Feb 2019 | Mar 2019 | Apr 2019 | May 2019 | | | | | | | | | |
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|-----------------------|---|-----------------------|------------|------------|------------|-----------|--------------|----------|----------|----------|-----------|--------------|----------|-----------|----------|----------|-----------------|----------|----------|----------|----------|-----------------|---------|----------|---------|----------|---|---------|----------|---------|---------|-----------|----------|------------|------------|----------|--------------|----------|----------|----------|-----------|-----------------------|----------|----------|----------|----------|--|----------|----------|----------|---------|-----------------|----------|------------|------------|----------|---------|---------|---------|---------|----------|--------------|----------|----------|----------|----------|-----|-----------|-----------|------------|-----------|-----------------|----------|----------|----------|----------|----------|----------|----------|-----------|----------|----------------|----------|---------|----------|---------|----|-----|-----|-----|-----|--------------|-----------|-----------|------------|-----------|-----------------------|-----------|-----------|----------|-----------|--|
| | <table border="1"> <tr><td>Ammonia</td><td>0.26 mg/L</td><td>13 mg/L</td><td>0.008 mg/L</td><td>19 mg/L</td></tr> <tr><td>BOD (5 days)</td><td>177 mg/L</td><td>60 mg/L</td><td>29 mg/L</td><td>26 mg/L</td></tr> <tr><td>COD</td><td>310 mg/L</td><td>9300 mg/L</td><td>40 mg/L</td><td>280 mg/L</td></tr> <tr><td>Dissolve oxygen</td><td>0.9 mg/L</td><td>2.2 mg/L</td><td>1.5 mg/L</td><td>1.1 mg/L</td></tr> <tr><td>Nitrogen</td><td>82 mg/L</td><td>11 mg/L</td><td>16 mg/L</td><td>33 mg/L</td></tr> <tr><td>Oil and grease</td><td>14 mg/L</td><td>3.0 mg/L</td><td>50 mg/L</td><td>40 mg/L</td></tr> <tr><td>pH</td><td>7.0</td><td>6.9</td><td>7.6</td><td>8.7</td></tr> <tr><td>Total solids</td><td>980 mg/L</td><td>730 mg/L</td><td>610 mg/L</td><td>940 mg/L</td></tr> <tr><td>Total suspended solid</td><td>210 mg/L</td><td>120 mg/L</td><td>120 mg/L</td><td>120 mg/L</td></tr> </table> | Ammonia | 0.26 mg/L | 13 mg/L | 0.008 mg/L | 19 mg/L | BOD (5 days) | 177 mg/L | 60 mg/L | 29 mg/L | 26 mg/L | COD | 310 mg/L | 9300 mg/L | 40 mg/L | 280 mg/L | Dissolve oxygen | 0.9 mg/L | 2.2 mg/L | 1.5 mg/L | 1.1 mg/L | Nitrogen | 82 mg/L | 11 mg/L | 16 mg/L | 33 mg/L | Oil and grease | 14 mg/L | 3.0 mg/L | 50 mg/L | 40 mg/L | pH | 7.0 | 6.9 | 7.6 | 8.7 | Total solids | 980 mg/L | 730 mg/L | 610 mg/L | 940 mg/L | Total suspended solid | 210 mg/L | 120 mg/L | 120 mg/L | 120 mg/L | <p>Navo Mill's POME quality from final discharge</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Feb 2019</th> <th>March 2019</th> <th>April 2019</th> <th>May 2019</th> </tr> </thead> <tbody> <tr><td>Ammonia</td><td>98 mg/L</td><td>86 mg/L</td><td>16 mg/L</td><td>128 mg/L</td></tr> <tr><td>BOD (5 days)</td><td>216 mg/L</td><td>566 mg/L</td><td>256 mg/L</td><td>682 mg/L</td></tr> <tr><td>COD</td><td>4300 mg/L</td><td>2100 mg/L</td><td>35000 mg/L</td><td>2600 mg/L</td></tr> <tr><td>Dissolve oxygen</td><td>0.9 mg/L</td><td>0.9 mg/L</td><td>1.7 mg/L</td><td>0.8 mg/L</td></tr> <tr><td>Nitrogen</td><td>280 mg/L</td><td>230 mg/L</td><td>1100 mg/L</td><td>330 mg/L</td></tr> <tr><td>Oil and grease</td><td>6.0 mg/L</td><td>11 mg/L</td><td>710 mg/L</td><td>46 mg/L</td></tr> <tr><td>pH</td><td>6.0</td><td>7.0</td><td>7.5</td><td>7.4</td></tr> <tr><td>Total solids</td><td>5040 mg/L</td><td>3180 mg/L</td><td>16900 mg/L</td><td>5820 mg/L</td></tr> <tr><td>Total suspended solid</td><td>1700 mg/L</td><td>1700 mg/L</td><td>440 mg/L</td><td>1300 mg/L</td></tr> </tbody> </table> | | | | | Parameter | Feb 2019 | March 2019 | April 2019 | May 2019 | Ammonia | 98 mg/L | 86 mg/L | 16 mg/L | 128 mg/L | BOD (5 days) | 216 mg/L | 566 mg/L | 256 mg/L | 682 mg/L | COD | 4300 mg/L | 2100 mg/L | 35000 mg/L | 2600 mg/L | Dissolve oxygen | 0.9 mg/L | 0.9 mg/L | 1.7 mg/L | 0.8 mg/L | Nitrogen | 280 mg/L | 230 mg/L | 1100 mg/L | 330 mg/L | Oil and grease | 6.0 mg/L | 11 mg/L | 710 mg/L | 46 mg/L | pH | 6.0 | 7.0 | 7.5 | 7.4 | Total solids | 5040 mg/L | 3180 mg/L | 16900 mg/L | 5820 mg/L | Total suspended solid | 1700 mg/L | 1700 mg/L | 440 mg/L | 1300 mg/L | |
| | | Ammonia | 0.26 mg/L | 13 mg/L | 0.008 mg/L | 19 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | BOD (5 days) | 177 mg/L | 60 mg/L | 29 mg/L | 26 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | COD | 310 mg/L | 9300 mg/L | 40 mg/L | 280 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Dissolve oxygen | 0.9 mg/L | 2.2 mg/L | 1.5 mg/L | 1.1 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Nitrogen | 82 mg/L | 11 mg/L | 16 mg/L | 33 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Oil and grease | 14 mg/L | 3.0 mg/L | 50 mg/L | 40 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | pH | 7.0 | 6.9 | 7.6 | 8.7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Total solids | 980 mg/L | 730 mg/L | 610 mg/L | 940 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Total suspended solid | 210 mg/L | 120 mg/L | 120 mg/L | 120 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Parameter | Feb 2019 | March 2019 | April 2019 | May 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Ammonia | 98 mg/L | 86 mg/L | 16 mg/L | 128 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | BOD (5 days) | 216 mg/L | 566 mg/L | 256 mg/L | 682 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | COD | 4300 mg/L | 2100 mg/L | 35000 mg/L | 2600 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Dissolve oxygen | 0.9 mg/L | 0.9 mg/L | 1.7 mg/L | 0.8 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Nitrogen | 280 mg/L | 230 mg/L | 1100 mg/L | 330 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Oil and grease | 6.0 mg/L | 11 mg/L | 710 mg/L | 46 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | pH | 6.0 | 7.0 | 7.5 | 7.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Total solids | 5040 mg/L | 3180 mg/L | 16900 mg/L | 5820 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Total suspended solid | 1700 mg/L | 1700 mg/L | 440 mg/L | 1300 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <table border="1"> <thead> <tr> <th>Parameter</th> <th>Feb 2019</th> <th>March 2019</th> <th>April 2019</th> <th>May 2019</th> </tr> </thead> <tbody> <tr><td>Ammonia</td><td>7.2 mg/L</td><td>1.2 mg/L</td><td>9.8 mg/L</td><td>0.13 mg/L</td></tr> <tr><td>BOD (5 days)</td><td>118 mg/L</td><td>258 mg/L</td><td>169 mg/L</td><td>17 mg/L</td></tr> <tr><td>COD</td><td>290 mg/L</td><td>380 mg/L</td><td>240 mg/L</td><td>50 mg/L</td></tr> <tr><td>Dissolve oxygen</td><td>1 mg/L</td><td>1.1 mg/L</td><td>1 mg/L</td><td>3.2 mg/L</td></tr> </tbody> </table> | Parameter | Feb 2019 | March 2019 | April 2019 | May 2019 | Ammonia | 7.2 mg/L | 1.2 mg/L | 9.8 mg/L | 0.13 mg/L | BOD (5 days) | 118 mg/L | 258 mg/L | 169 mg/L | 17 mg/L | COD | 290 mg/L | 380 mg/L | 240 mg/L | 50 mg/L | Dissolve oxygen | 1 mg/L | 1.1 mg/L | 1 mg/L | 3.2 mg/L | <p>Barema Mill's POME quality</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Feb 2019</th> <th>March 2019</th> <th>April 2019</th> <th>May 2019</th> </tr> </thead> <tbody> <tr><td>Ammonia</td><td>7.2 mg/L</td><td>1.2 mg/L</td><td>9.8 mg/L</td><td>0.13 mg/L</td></tr> <tr><td>BOD (5 days)</td><td>118 mg/L</td><td>258 mg/L</td><td>169 mg/L</td><td>17 mg/L</td></tr> <tr><td>COD</td><td>290 mg/L</td><td>380 mg/L</td><td>240 mg/L</td><td>50 mg/L</td></tr> <tr><td>Dissolve oxygen</td><td>1 mg/L</td><td>1.1 mg/L</td><td>1 mg/L</td><td>3.2 mg/L</td></tr> </tbody> </table> | | | | | Parameter | Feb 2019 | March 2019 | April 2019 | May 2019 | Ammonia | 7.2 mg/L | 1.2 mg/L | 9.8 mg/L | 0.13 mg/L | BOD (5 days) | 118 mg/L | 258 mg/L | 169 mg/L | 17 mg/L | COD | 290 mg/L | 380 mg/L | 240 mg/L | 50 mg/L | Dissolve oxygen | 1 mg/L | 1.1 mg/L | 1 mg/L | 3.2 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Parameter | Feb 2019 | March 2019 | April 2019 | May 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Ammonia | 7.2 mg/L | 1.2 mg/L | 9.8 mg/L | 0.13 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | BOD (5 days) | 118 mg/L | 258 mg/L | 169 mg/L | 17 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | COD | 290 mg/L | 380 mg/L | 240 mg/L | 50 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Dissolve oxygen | 1 mg/L | 1.1 mg/L | 1 mg/L | 3.2 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Parameter | Feb 2019 | March 2019 | April 2019 | May 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Ammonia | 7.2 mg/L | 1.2 mg/L | 9.8 mg/L | 0.13 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | BOD (5 days) | 118 mg/L | 258 mg/L | 169 mg/L | 17 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | COD | 290 mg/L | 380 mg/L | 240 mg/L | 50 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Dissolve oxygen | 1 mg/L | 1.1 mg/L | 1 mg/L | 3.2 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 9 (Nov /2019)

| Criterion / Indicator | | Assessment Findings | | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------|--|---|--------------------|------------|-------------------|---------------------|------------|------|------|------|------|------|---------------|-----------|-----------|------------|------------|----------|-----------|---------|---------|---------|------------|--------|-----------------|---------|---------|---------|--------|--------|--------------|--------|--------|--------|--------|--------|----------------|--------|--------|--------|--------|--------|-------------------------|------|------|------|------|------|-------------------------------|------|------|------|------|------|----------------------------|------|-----|------|------|------|------------------------------|------|------|------|------|------|--|------|--|--|------|--|--|-----------|-------------------|--------------------|-----------|-------------------|---------------------|--|--|--|--|--|--|--|-----|
| | | Nitrogen | 17 mg/L | 160 mg/L | <10 mg/L | <10 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Oil and grease | 15 mg/L | 1.5 mg/L | 132 mg/L | 100 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | pH | 6.3 | 5.6 | 6.8 | 7.7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Total solids | 680 mg/L | 530 mg/L | 440 mg/L | 230 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Total suspended solid | 60 mg/L | 220 mg/L | 200 mg/L | 6 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.4 | Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored and recorded with information presented to permit identification of trends. - Minor compliance - | Hargy POM: <table border="1"> <thead> <tr> <th></th> <th>2015</th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>FFB Processed</td> <td>162740.61</td> <td>172,635.8</td> <td>171,839.46</td> <td>145,051.70</td> <td>78,866.2</td> </tr> <tr> <td>Raw water</td> <td>200,273</td> <td>237,534</td> <td>202,212</td> <td>126,243.75</td> <td>90,580</td> </tr> <tr> <td>Processed water</td> <td>113,234</td> <td>147,360</td> <td>139,507</td> <td>42,539</td> <td>32,600</td> </tr> <tr> <td>Boiler water</td> <td>58,369</td> <td>52,646</td> <td>44,915</td> <td>54,931</td> <td>38,852</td> </tr> <tr> <td>Domestic water</td> <td>28,670</td> <td>43,348</td> <td>22,556</td> <td>55,505</td> <td>11,654</td> </tr> <tr> <td>Raw water per tonne FFB</td> <td>1.23</td> <td>0.38</td> <td>1.18</td> <td>0.87</td> <td>1.15</td> </tr> <tr> <td>Processed water per tonne FFB</td> <td>0.70</td> <td>0.85</td> <td>0.18</td> <td>0.29</td> <td>0.41</td> </tr> <tr> <td>Boiler water per tonne FFB</td> <td>0.36</td> <td>0.3</td> <td>0.26</td> <td>0.83</td> <td>0.49</td> </tr> <tr> <td>Domestic water per tonne FFB</td> <td>0.18</td> <td>0.25</td> <td>0.13</td> <td>0.83</td> <td>0.15</td> </tr> </tbody> </table> Barema POM: <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">2018</th> <th colspan="3">2019</th> </tr> <tr> <th>Water use</th> <th>Ton FFB Processed</th> <th>Water/FB processed</th> <th>Water use</th> <th>Ton FFB Processed</th> <th>Water/FFB processed</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | | | | | 2015 | 2016 | 2017 | 2018 | 2019 | FFB Processed | 162740.61 | 172,635.8 | 171,839.46 | 145,051.70 | 78,866.2 | Raw water | 200,273 | 237,534 | 202,212 | 126,243.75 | 90,580 | Processed water | 113,234 | 147,360 | 139,507 | 42,539 | 32,600 | Boiler water | 58,369 | 52,646 | 44,915 | 54,931 | 38,852 | Domestic water | 28,670 | 43,348 | 22,556 | 55,505 | 11,654 | Raw water per tonne FFB | 1.23 | 0.38 | 1.18 | 0.87 | 1.15 | Processed water per tonne FFB | 0.70 | 0.85 | 0.18 | 0.29 | 0.41 | Boiler water per tonne FFB | 0.36 | 0.3 | 0.26 | 0.83 | 0.49 | Domestic water per tonne FFB | 0.18 | 0.25 | 0.13 | 0.83 | 0.15 | | 2018 | | | 2019 | | | Water use | Ton FFB Processed | Water/FB processed | Water use | Ton FFB Processed | Water/FFB processed | | | | | | | | Yes |
| | 2015 | 2016 | 2017 | 2018 | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB Processed | 162740.61 | 172,635.8 | 171,839.46 | 145,051.70 | 78,866.2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Raw water | 200,273 | 237,534 | 202,212 | 126,243.75 | 90,580 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Processed water | 113,234 | 147,360 | 139,507 | 42,539 | 32,600 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Boiler water | 58,369 | 52,646 | 44,915 | 54,931 | 38,852 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Domestic water | 28,670 | 43,348 | 22,556 | 55,505 | 11,654 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Raw water per tonne FFB | 1.23 | 0.38 | 1.18 | 0.87 | 1.15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Processed water per tonne FFB | 0.70 | 0.85 | 0.18 | 0.29 | 0.41 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Boiler water per tonne FFB | 0.36 | 0.3 | 0.26 | 0.83 | 0.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Domestic water per tonne FFB | 0.18 | 0.25 | 0.13 | 0.83 | 0.15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 2018 | | | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Water use | Ton FFB Processed | Water/FB processed | Water use | Ton FFB Processed | Water/FFB processed | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|-----------------------|-----------|--|---------------------|--|------|--------|-----------|------------|------|--|------|--|--|-----------|-------------------|---------------------|-----|--------|--------|------|-----|--------|--------|------|-----|--------|--------|------|-----|--------|--------|------|-----|--------|--------|------|-----|--------|--------|------|-----|-------|-------|------|-----|-------|-------|------|-----|--------|
| | | Jan | 27,246 | 13,310.02 | 2.08 | 20,858 | 12,919.06 | 1.61 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Feb | 20,926 | 11,099.62 | 1.96 | 12,143 | 6,414.16 | 1.89 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Mar | 26,516 | 15,784.14 | 1.75 | 19,111 | 11,951.28 | 1.60 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Apr | 25,797 | 15,516.62 | 1.68 | 21,909 | 13,394.06 | 1.64 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | May | 26,464 | 18,106.86 | 1.53 | 29,569 | 19,211.98 | 1.54 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Jun | 27,552 | 19,556.62 | 1.54 | 22,798 | 14,141.82 | 1.61 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Jul | 33,575 | 16,190.84 | 2.01 | 20,191 | 12,108.56 | 1.67 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Aug | 25,614 | 16,146.68 | 1.59 | 20,393 | 12,454.62 | 1.64 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Sep | 22,984 | 13,162.10 | 1.75 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Oct | 30,304 | 19,801.14 | 1.53 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Nov | 26,835 | 17,518.02 | 1.53 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Dec | 27,445 | 16,369.06 | 1.68 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | 166,972 | 102,595.50 | 1.63 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | Navo POM: <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">2019</th> </tr> <tr> <th>Water use</th> <th>Ton FFB Processed</th> <th>Water/FFB processed</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>20,746</td> <td>21,254</td> <td>0.97</td> </tr> <tr> <td>Feb</td> <td>12,339</td> <td>13,979</td> <td>0.88</td> </tr> <tr> <td>Mar</td> <td>19,238</td> <td>22,804</td> <td>0.84</td> </tr> <tr> <td>Apr</td> <td>18,910</td> <td>20,591</td> <td>0.91</td> </tr> <tr> <td>May</td> <td>16,161</td> <td>22,310</td> <td>0.72</td> </tr> <tr> <td>Jun</td> <td>14,899</td> <td>14,277</td> <td>1.04</td> </tr> <tr> <td>Jul</td> <td>4,193</td> <td>1,979</td> <td>2.11</td> </tr> <tr> <td>Aug</td> <td>4,214</td> <td>4,242</td> <td>0.99</td> </tr> <tr> <td>Sep</td> <td>11,361</td> <td>11,196</td> <td>1.01</td> </tr> </tbody> </table> | | | | | | | 2019 | | | Water use | Ton FFB Processed | Water/FFB processed | Jan | 20,746 | 21,254 | 0.97 | Feb | 12,339 | 13,979 | 0.88 | Mar | 19,238 | 22,804 | 0.84 | Apr | 18,910 | 20,591 | 0.91 | May | 16,161 | 22,310 | 0.72 | Jun | 14,899 | 14,277 | 1.04 | Jul | 4,193 | 1,979 | 2.11 | Aug | 4,214 | 4,242 | 0.99 | Sep | 11,361 |
| | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Water use | Ton FFB Processed | Water/FFB processed | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan | 20,746 | 21,254 | 0.97 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb | 12,339 | 13,979 | 0.88 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar | 19,238 | 22,804 | 0.84 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr | 18,910 | 20,591 | 0.91 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 16,161 | 22,310 | 0.72 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun | 14,899 | 14,277 | 1.04 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul | 4,193 | 1,979 | 2.11 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug | 4,214 | 4,242 | 0.99 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep | 11,361 | 11,196 | 1.01 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

*) The water use in July increase due to Mount Ulawun eruption in June, July, September 2019. Water was used for cleaning Navo POM before running.

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| <p>4.5.1</p> <p>Implementation of Integrated Pest Management (IPM) plans shall be monitored.</p> <p>- Major compliance -</p> | <p>SOP Available in document No.PLN-ESD-SUS-001-05 dated 28 April 2017, therein includes: Protocol for monitoring and managing oil palm pests and pesticides usage aimed to ensure that handling, collection, storage, application and disposal of pesticides at plantation levels is in compliance with both the environmental, health, safety policies and applicable national & international legislations. Example are:</p> <ol style="list-style-type: none"> 1. Pest survey & monitoring 2. Safety and effective use of pesticides 3. Insect control 4. Weed control 5. Disease control <p>Methods of reducing pesticides usage: More prudent use of pesticides, Judicious use of pesticides, HOPL uses only chemical approved under national regulation and the environmentally compatible chemical are chosen for use in the plantation.</p> <p>Officer/Staff who detect pest report to Entomology (PNG-OPRA), record seen under "Pest Infestation Request (PestReq)" No.1119 dated 30 January 2019. Reported by: Elsie Riris; dated visit 6 February 2019; visited by S. Nyaure. For Plantation: Kiba; Division 1 & 2; species present: Saxava defoliaria; estimated damage: Severe. Recommendation: Targetted Trunk Injection (TTI) using Dimehypo is recommended for 228.8 Ha covering the blocks indicated; completed the attached TTI DR once the treatment is completed and return to PNGOPRA. PesRec TTI using Dimehypo also available dated 18 March 2019 for Kiba Plantation Division 2;</p> <p>PesRec No.4219; estimated damage Severe; 238 Ha;</p> <p>PesRec No.4919, dated 18 April 2019 for Hargy Plantation Division 3; estimated damage Moderate;</p> <p>PesRec No.5519, dated 9 April 2019 for Vamakuma Plantation Division 2; estimated damage Severe.</p> <p>Sample seen: Dimehypo Application Record to August 2019. In liters/Ha: 2 to 2.6 liters/Ha (11 blocks); 1.6 to 2 liters/Ha (1 block); 1.2 to 1.6 liters/Ha (3 blocks); 0.8 to 1.2 liters/Ha (1 block); 0.4 to 0.8 liters/Ha (2);</p> | <p>Yes</p> |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|---|---------------------------------|----------|---------------------|-------------|------------------|------|--------|------|------------------|------|---------------|------|------------------|------|---------------|------|-----------|------|---------------|------|--------------|------|---------------|------|--------|-------|---------------|------|------------|------|--------|---------------------------------|----------|---|------------|----------------------|-------------|---|------------|----------------------|-----------|-------|--|--|-----|
| | | <p>0 to 0.4 liters/Ha (15 blocks). Implementation of Integrated Pest Management plan is monitored monthly in Estate Report: Agronomic Dashboard and Pesticides Applied.</p> <p>The company held IPM meeting in quarterly basis. Latest IPM meeting held on 18 September 2019. Meeting attended by Entomology Supervisor-PNGOPRA-Bialla, Crop Protection Supervisor, Navo Group Plantation Manager, Manager Agriculture Advisory, Assistant Agronomy, General Manager Community Affairs, Plantation Manager-Barema, OPIC Officer, Head of Department Community Affairs, SSR/Agronomic OIC-Bialla, Company Agronomist, Plantation Manager Hargy Plantation, General Plantation Manager HOPL. Meeting discussed about safety, training, awareness, overall pest and disease situation, matter arise from meeting, pest survey and monitoring, update on monitoring and treatment/control and new report, material and equipment stock, productivity, previous monitoring reporting, and action plan.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <p>Associated Smallholder Requirement: Companies to manage IPM program for Associated Smallholders.</p> | <p>Based on minutes of IPM meeting dated 18 September 2019, the company assisted by PNG-OPRA, managed IPM program for Associated Smallholders. The document described sexava control in smallholders 2019 to update on 2018 outstanding Pest Rec, as follows:</p> <table border="1"> <thead> <tr> <th>Pest Request Received</th> <th>Hectares</th> <th>Pest Request Issued</th> <th>TTI Remarks</th> </tr> </thead> <tbody> <tr> <td>Aupupul/Baekakea</td> <td>34.0</td> <td>Issued</td> <td>Done</td> </tr> <tr> <td>Barema Section 3</td> <td>33.5</td> <td>Issued (4019)</td> <td>Done</td> </tr> <tr> <td>Kabaya Section 6</td> <td>46.3</td> <td>Issued (4019)</td> <td>Done</td> </tr> <tr> <td>Kiava VOP</td> <td>21.6</td> <td>Issued (4019)</td> <td>Done</td> </tr> <tr> <td>Malasi 2 VOP</td> <td>88.9</td> <td>Issued (4719)</td> <td>Done</td> </tr> <tr> <td>Wilelo</td> <td>114.5</td> <td>Issued (5119)</td> <td>Done</td> </tr> <tr> <td>Bageta VOP</td> <td>29.2</td> <td>Issued</td> <td>Delayed due to volcano eruption</td> </tr> <tr> <td>Noau VOP</td> <td>-</td> <td>Not Issued</td> <td>Awaiting updated map</td> </tr> <tr> <td>Gilo Estate</td> <td>-</td> <td>Not Issued</td> <td>Rehabilitation issue</td> </tr> <tr> <td>Total Sum</td> <td>334.2</td> <td></td> <td></td> </tr> </tbody> </table> <p>Disease: no disease palm recorded so far.</p> | Pest Request Received | Hectares | Pest Request Issued | TTI Remarks | Aupupul/Baekakea | 34.0 | Issued | Done | Barema Section 3 | 33.5 | Issued (4019) | Done | Kabaya Section 6 | 46.3 | Issued (4019) | Done | Kiava VOP | 21.6 | Issued (4019) | Done | Malasi 2 VOP | 88.9 | Issued (4719) | Done | Wilelo | 114.5 | Issued (5119) | Done | Bageta VOP | 29.2 | Issued | Delayed due to volcano eruption | Noau VOP | - | Not Issued | Awaiting updated map | Gilo Estate | - | Not Issued | Rehabilitation issue | Total Sum | 334.2 | | | Yes |
| Pest Request Received | Hectares | Pest Request Issued | TTI Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aupupul/Baekakea | 34.0 | Issued | Done | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Barema Section 3 | 33.5 | Issued (4019) | Done | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kabaya Section 6 | 46.3 | Issued (4019) | Done | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kiava VOP | 21.6 | Issued (4019) | Done | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Malasi 2 VOP | 88.9 | Issued (4719) | Done | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Wilelo | 114.5 | Issued (5119) | Done | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bageta VOP | 29.2 | Issued | Delayed due to volcano eruption | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Noau VOP | - | Not Issued | Awaiting updated map | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gilo Estate | - | Not Issued | Rehabilitation issue | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Sum | 334.2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|--|----------------|--|--|------------|----------------|---------|---------|-------------------|----------------------|----------|----------------|-----------------|--------------------|-----------------------|--------------|----------------|-----------------------------|-------|-------------|----------------|------------|-------|-------------|---------------|---------------------------------|-----------------------|------|--------------|-----------------|-------|--------------|-------------|-------------------------|-------|--------------|---------------|-------------------------|-------|--------------|---------------|-------------------|-------|--------------|------------------|-------------------------|-------|--------------|------------------|---------------------|-------|--------------|-----|
| | | Below are records of smallholders area treated by Dimehypo: <table border="1"> <thead> <tr> <th colspan="2">2018</th> <th colspan="2">2019</th> </tr> <tr> <th>Total Ha</th> <th>Dimehypo (ltr)</th> <th>Total Ha</th> <th>Dimehypo (ltr)</th> </tr> </thead> <tbody> <tr> <td>2,077.42</td> <td>4,913.74</td> <td>487.69</td> <td>585.1</td> </tr> </tbody> </table> | | | | 2018 | | 2019 | | Total Ha | Dimehypo (ltr) | Total Ha | Dimehypo (ltr) | 2,077.42 | 4,913.74 | 487.69 | 585.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2018 | | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Ha | Dimehypo (ltr) | Total Ha | Dimehypo (ltr) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2,077.42 | 4,913.74 | 487.69 | 585.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.2 | Training of those involved in IPM implementation shall be demonstrated. - Minor compliance - | Hargy Oil Palms Limited provides training for the workers involved in IPM. Training attendance list and material were evident. TTI Team attended training every year by PNG-OPRA Entomologist, latest is on 19-20 March 2019. Health and safety precaution is observed and understood by the team including handling, storage, disposal and the usage of pesticides is clearly demonstrated. There were mini field days conducted and awareness monitoring and reporting guideline is delivered out during field days by Seno and Jude. Evidence seen: Training Attendance Register dated 19 March 2019, venue: Area 8 Training Room. Attended by 26 participants, among others Davidson Senny (Navo), Ala Gatnada (Makakiwa), Steven Kairen (Navo), Lazarus Alois (Makakiwa), Johnes Turi (Makakiwa), Issaih Menox (Makakiwa), Cedrick Philip (Navo), Nick Tolon (Navo). <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>26 September 2019</td> <td>Spraying SOP and PPE</td> <td>Staff</td> <td>Hargy Estate</td> </tr> <tr> <td>17-19 June 2019</td> <td>First Aid Training</td> <td>PNG Red Cross Society</td> <td>Hargy Estate</td> </tr> <tr> <td>12 August 2019</td> <td>Spraying standard refresher</td> <td>Staff</td> <td>Navo Estate</td> </tr> <tr> <td>29 August 2019</td> <td>Fertilizer</td> <td>Staff</td> <td>Navo Estate</td> </tr> <tr> <td>20 March 2019</td> <td>Targetted Trunk Injection (TTI)</td> <td>PNG-OPRA Entomologist</td> <td>HOPL</td> </tr> <tr> <td>28 July 2018</td> <td>MSDS, First Aid</td> <td>Staff</td> <td>Pandi Estate</td> </tr> <tr> <td>26 May 2018</td> <td>Spraying SOP and Safety</td> <td>Staff</td> <td>Pandi Estate</td> </tr> <tr> <td>28 April 2018</td> <td>Chemical Spray Standard</td> <td>Staff</td> <td>Pandi Estate</td> </tr> <tr> <td>20 March 2018</td> <td>Chemical Spillage</td> <td>Staff</td> <td>Pandi Estate</td> </tr> <tr> <td>20 February 2018</td> <td>Spraying SOP and Safety</td> <td>Staff</td> <td>Pandi Estate</td> </tr> <tr> <td>11 November 2018</td> <td>Pesticides Handling</td> <td>Staff</td> <td>Pandi Estate</td> </tr> </tbody> </table> | | | | Date | Training Topic | Trainer | Remarks | 26 September 2019 | Spraying SOP and PPE | Staff | Hargy Estate | 17-19 June 2019 | First Aid Training | PNG Red Cross Society | Hargy Estate | 12 August 2019 | Spraying standard refresher | Staff | Navo Estate | 29 August 2019 | Fertilizer | Staff | Navo Estate | 20 March 2019 | Targetted Trunk Injection (TTI) | PNG-OPRA Entomologist | HOPL | 28 July 2018 | MSDS, First Aid | Staff | Pandi Estate | 26 May 2018 | Spraying SOP and Safety | Staff | Pandi Estate | 28 April 2018 | Chemical Spray Standard | Staff | Pandi Estate | 20 March 2018 | Chemical Spillage | Staff | Pandi Estate | 20 February 2018 | Spraying SOP and Safety | Staff | Pandi Estate | 11 November 2018 | Pesticides Handling | Staff | Pandi Estate | Yes |
| Date | Training Topic | Trainer | Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26 September 2019 | Spraying SOP and PPE | Staff | Hargy Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17-19 June 2019 | First Aid Training | PNG Red Cross Society | Hargy Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 August 2019 | Spraying standard refresher | Staff | Navo Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 29 August 2019 | Fertilizer | Staff | Navo Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20 March 2019 | Targetted Trunk Injection (TTI) | PNG-OPRA Entomologist | HOPL | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 28 July 2018 | MSDS, First Aid | Staff | Pandi Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26 May 2018 | Spraying SOP and Safety | Staff | Pandi Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 28 April 2018 | Chemical Spray Standard | Staff | Pandi Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20 March 2018 | Chemical Spillage | Staff | Pandi Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20 February 2018 | Spraying SOP and Safety | Staff | Pandi Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 November 2018 | Pesticides Handling | Staff | Pandi Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| | <p>Associated Smallholder Requirement: Companies to manage IPM for Associated Smallholders.</p> | <p>The smallholders are being educated through the Field Days conducted by HOPL and PNG OPRA. TTI Team attended training every year by PNG-OPRA Entimologist, latest is on 19-20 March 2019. Health and safety precaution is observed and understood by the team including handling, storage, disposal and the usage of pesticides is clearly demonstrated. There were mini field days conducted and awareness monitoring and reporting guideline is delivered out during field days by Seno and Jude. Evidence seen: Training Attendance Register dated 19 March 2019, venue: Area 8 Training Room. Attended by 26 participants, among others Davidson Senny (Navo), Ala Gatnada (Makakiwa), Steven Kairen (Navo), Lazarus Alois (Makakiwa), Johnes Turi (Makakiwa), Issaih menox (Makakiwa), Cedrick Philip (Navo), Nick Tolon (Navo).</p> <p>It is conformed through interview and document review, that smallholders have attended training of Agricultural Safety and Crop Spraying, e.g. Certificate of Matilda M. Palik (Matililiu VOP Block No.171783) on 30 August 2017; Certificate of Michael Lopese (Malassi LSS Block No.040680) on 4 October 2018; Certificate of John Tabari (Malassi LSS Block No.040610) on 30 August 2017; Certificate of Vitolo Mera (Malassi LSS Block No.040409) on 4 October 2018.</p> | Yes |
| <p>Criterion 4.6 Pesticides are used in ways that do not endanger health or the environment</p> | | | |
| 4.6.1 | <p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -</p> | <p>Documented justification of all agrochemical use is available under Approved Product List for use in industrial and agricultural application, informing the product name, type of pesticide, active ingredients, LD50, approved agricultural use. The guidelines were used for company-owned plantation and smallholder blocks. Justification came from the government agency as well named "Environment Permit" issued by Conservation and Environment Protection Authority. Environment Permit is issued based on Section 65 of the</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|--------------------------------------|------------------------|-------------------|--------------------------------------|--|-----|-------|------|--|-----|-------|------|---|-------|-------|------|---|-------|-------|------|---------------------------------------|-------|-------|------|---------------------------------|------|-------|------|-----------------------------------|------|-------|------|-----------------------------|------|-------|------|--------------------------------|------|-------|------|-----|
| | | <p>Environment Act 2000. Sample evident for Dimehypo (Bisultap) under permit number P-144, dated of issue 4 July 2016, valid until 3 July 2021.</p> <p>Smallholders: No pesticide was issued to the smallholders. The smallholders would only use herbicide. In case of chemical control of pest such as Saxava, it was done by HOPL – under supervision of PNG OPRA.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.2 | <p>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.</p> <p>- Major compliance -</p> | <p>Hargy Oil Palms maintained the record of pesticide use, active ingredient, and hectare of area treated – for each estate. Daily spraying works are recorded in Herbicide Spray Cost Book, e.g. Hargy Estate, Division 1, period January to August 2019.</p> <p>Below are record of pesticide use in whole HOPL area for 2019 (to-date August) based on OMP Report. Hargy Estate – Kerakera Plantation:</p> <table border="1"> <thead> <tr> <th>Active Ingredients</th> <th>Applied (kg or litres)</th> <th>Sprayed Area (Ha)</th> <th>Pesticides applied (kg or litres/Ha)</th> </tr> </thead> <tbody> <tr> <td>Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path)</td> <td>5.6</td> <td>395.6</td> <td>0.01</td> </tr> <tr> <td>Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Selective weeding)</td> <td>5.8</td> <td>358.9</td> <td>0.01</td> </tr> <tr> <td>Asulox – Asulam 400g/liter (Program: Circle and Path)</td> <td>100.7</td> <td>181.1</td> <td>0.56</td> </tr> <tr> <td>Asulox – Asulam 400g/liter (Program: Selective)</td> <td>195.7</td> <td>187.1</td> <td>1.05</td> </tr> <tr> <td>Glyphosate (Program: Circle and Path)</td> <td>206.7</td> <td>337.2</td> <td>0.61</td> </tr> <tr> <td>Glyphosate (Program: Selective)</td> <td>77.2</td> <td>332.4</td> <td>0.23</td> </tr> <tr> <td>Li-700 (Program: Circle and Path)</td> <td>37.2</td> <td>395.6</td> <td>0.09</td> </tr> <tr> <td>Li-700 (Program: Selective)</td> <td>22.3</td> <td>358.9</td> <td>0.06</td> </tr> <tr> <td>Tri-Ester (Program: Selective)</td> <td>13.5</td> <td>276.5</td> <td>0.05</td> </tr> </tbody> </table> <p>Pandi Estate:</p> | Active Ingredients | Applied (kg or litres) | Sprayed Area (Ha) | Pesticides applied (kg or litres/Ha) | Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path) | 5.6 | 395.6 | 0.01 | Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Selective weeding) | 5.8 | 358.9 | 0.01 | Asulox – Asulam 400g/liter (Program: Circle and Path) | 100.7 | 181.1 | 0.56 | Asulox – Asulam 400g/liter (Program: Selective) | 195.7 | 187.1 | 1.05 | Glyphosate (Program: Circle and Path) | 206.7 | 337.2 | 0.61 | Glyphosate (Program: Selective) | 77.2 | 332.4 | 0.23 | Li-700 (Program: Circle and Path) | 37.2 | 395.6 | 0.09 | Li-700 (Program: Selective) | 22.3 | 358.9 | 0.06 | Tri-Ester (Program: Selective) | 13.5 | 276.5 | 0.05 | Yes |
| Active Ingredients | Applied (kg or litres) | Sprayed Area (Ha) | Pesticides applied (kg or litres/Ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path) | 5.6 | 395.6 | 0.01 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Selective weeding) | 5.8 | 358.9 | 0.01 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Asulox – Asulam 400g/liter (Program: Circle and Path) | 100.7 | 181.1 | 0.56 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Asulox – Asulam 400g/liter (Program: Selective) | 195.7 | 187.1 | 1.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Glyphosate (Program: Circle and Path) | 206.7 | 337.2 | 0.61 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Glyphosate (Program: Selective) | 77.2 | 332.4 | 0.23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Li-700 (Program: Circle and Path) | 37.2 | 395.6 | 0.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Li-700 (Program: Selective) | 22.3 | 358.9 | 0.06 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tri-Ester (Program: Selective) | 13.5 | 276.5 | 0.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 9 (Nov /2019)

| Criterion / Indicator | | Assessment Findings | | | | Compliance | |
|-----------------------|--|--|------------------------|----|-------------------|------------|--|
| | | Bakada Plantation – Alangily Division | | | | | |
| | | Active Ingredients | Applied (kg or litres) | or | Sprayed Area (Ha) | | Pesticides applied (kg or litres / Ha) |
| | | Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path) | 7.5 | | 295.7 | | 0.03 |
| | | Glyphosate (Program: Circle and Path) | 226.2 | | 295.7 | | 0.76 |
| | | Li-700 (Program: Circle and Path) | 45.3 | | 295.7 | | 0.15 |
| | | Tri-Ester (Program: Selective) | 21.2 | | 191.0 | | 0.11 |
| | | Pandi Estate: | | | | | |
| | | Bakada Plantation – Alaba Division | | | | | |
| | | Active Ingredients | Applied (kg or litres) | or | Sprayed Area (Ha) | | Pesticides applied (kg or litres/Ha) |
| | | Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path) | 14.9 | | 928.0 | | 0.02 |
| | | Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Selective weeding) | 0.9 | | 137.8 | | 0.01 |
| | | Glyphosate (Program: Circle and Path) | 587.5 | | 928.0 | | 0.63 |
| | | Glyphosate (Program: Selective) | 20.9 | | 107.4 | | 0.19 |
| | | Li-700 (Program: Circle and Path) | 121.2 | | 928.0 | | 0.13 |
| | | Li-700 (Program: Selective) | 8.2 | | 137.8 | | 0.06 |
| | | Tri-Ester (Program: Circle and Path) | 35.5 | | 356.2 | | 0.10 |
| | | Tri-Ester (Program: Selective) | 6.1 | | 30.4 | | 0.20 |
| | | Navo Estate: | | | | | |
| | | Atata 1 Plantation – Remailing Division | | | | | |
| | | Active Ingredients | Applied (kg or litres) | or | Sprayed Area (Ha) | | Pesticides applied (kg or litres/Ha) |

RSPO Public Summary Report
Revision 9 (Nov /2019)

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|------|---|-----------------|----------|-----------------|--------------------|----------|--------------------|-----------------|----------|-----------------|-------------|---------------|---------------------------------------|------|------|------|------|---|------------------------------------|----|------|------|------|------|-------------------------|----|------|--------|------|------|-------------------------|----|------|-------|------|------|-------------------------------|----|------|------|------|------|---------------------|----|-----|------|-------|------|--|
| | | Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path) | 10.3 | 583.7 | 0.02 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Selective weeding) | 28.2 | 583.7 | 0.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Glyphosate (Program: Circle and Path) | 337.1 | 583.7 | 0.58 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Glyphosate (Program: Selective) | 130.3 | 549.6 | 0.24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Li-700 (Program: Circle and Path) | 73.9 | 583.7 | 0.13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Li-700 (Program: Selective) | 27.8 | 552.0 | 0.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Below are toxicity analysis over all HOPL plantation 2019 (todate August 2019): | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | <table border="1"> <thead> <tr> <th>Active Ingredients</th> <th>AI %</th> <th>LD50</th> <th>AI Applied (kg)</th> <th>Tox./ Ha</th> <th>Tox./t on FFB</th> </tr> </thead> <tbody> <tr> <td>Ally 20DF – Metyl Metsulfuron 200g/kg</td> <td>20</td> <td>5000</td> <td>4.19</td> <td>0.03</td> <td>-</td> </tr> <tr> <td>Asulox – Alkylethersulfate, sodium</td> <td>20</td> <td>5000</td> <td>2.73</td> <td>0.65</td> <td>0.38</td> </tr> <tr> <td>Glyphosate – Glyphosate</td> <td>45</td> <td>5000</td> <td>140.97</td> <td>0.91</td> <td>0.13</td> </tr> <tr> <td>Li-700 – Propionic Acid</td> <td>40</td> <td>5000</td> <td>29.40</td> <td>0.19</td> <td>0.03</td> </tr> <tr> <td>Tri-Ester – Triclopyr-butotyl</td> <td>32</td> <td>2000</td> <td>2.94</td> <td>0.45</td> <td>0.03</td> </tr> <tr> <td>Dimehypo – Bisultap</td> <td>25</td> <td>480</td> <td>9.12</td> <td>32.38</td> <td>1.49</td> </tr> </tbody> </table> | | | | | | Active Ingredients | AI % | LD50 | AI Applied (kg) | Tox./ Ha | Tox./t on FFB | Ally 20DF – Metyl Metsulfuron 200g/kg | 20 | 5000 | 4.19 | 0.03 | - | Asulox – Alkylethersulfate, sodium | 20 | 5000 | 2.73 | 0.65 | 0.38 | Glyphosate – Glyphosate | 45 | 5000 | 140.97 | 0.91 | 0.13 | Li-700 – Propionic Acid | 40 | 5000 | 29.40 | 0.19 | 0.03 | Tri-Ester – Triclopyr-butotyl | 32 | 2000 | 2.94 | 0.45 | 0.03 | Dimehypo – Bisultap | 25 | 480 | 9.12 | 32.38 | 1.49 | |
| | | Active Ingredients | AI % | LD50 | AI Applied (kg) | | Tox./ Ha | Tox./t on FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Ally 20DF – Metyl Metsulfuron 200g/kg | 20 | 5000 | 4.19 | | 0.03 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Asulox – Alkylethersulfate, sodium | 20 | 5000 | 2.73 | | 0.65 | 0.38 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Glyphosate – Glyphosate | 45 | 5000 | 140.97 | | 0.91 | 0.13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Li-700 – Propionic Acid | 40 | 5000 | 29.40 | | 0.19 | 0.03 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Tri-Ester – Triclopyr-butotyl | 32 | 2000 | 2.94 | | 0.45 | 0.03 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dimehypo – Bisultap | 25 | 480 | 9.12 | 32.38 | 1.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Below are toxicity analysis over all HOPL plantation 2018: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <thead> <tr> <th>Active Ingredients</th> <th>AI %</th> <th>LD50</th> <th>AI Applied (kg)</th> <th>Tox./ Ha</th> <th>Tox./ ton FFB</th> </tr> </thead> <tbody> <tr> <td>Ally 20DF –</td> <td>20</td> <td>5000</td> <td>4.79</td> <td>0.02</td> <td>-</td> </tr> </tbody> </table> | | | | | | Active Ingredients | AI % | LD50 | AI Applied (kg) | Tox./ Ha | Tox./ ton FFB | Ally 20DF – | 20 | 5000 | 4.79 | 0.02 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Active Ingredients | AI % | LD50 | AI Applied (kg) | Tox./ Ha | Tox./ ton FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ally 20DF – | 20 | 5000 | 4.79 | 0.02 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|--|----------|-------------------|--------|-------|------------|------|--|------|--|----------|-------------------|----------|-------------------|---|-------|----------|-------|----------|---|--------|--------|---|---|------|-------|--------|----------|--------|----------|------|-----------|-----------------|----------|-----------|--------|--------|-----|------|-------|--------|--------|-----|------|-------|--------|--------|-----|------|-------|--------|--------|-----|------|-------|--------|---------|-----|------|-------|-----|---------|-----|------|-------|-----|---------|-----|------|-------|----------|--------|-----|------|-------|----------|-------|-----|------|-------|-----|
| | | Metyl Metsulfuron 200g/kg | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Asulox – Alkylethersulfate, sodium | 20 | 5000 | 3.88 | 0.49 | 0.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Glyphosate – Glyphosate | 45 | 5000 | 263.01 | 0.85 | 0.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Li-700 – Propionic Acid | 40 | 5000 | 42.29 | 0.15 | 0.02 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Tri-Ester – Triclopyr-butotyl | 32 | 2000 | 1.35 | 0.71 | 0.03 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Dimehypo – Bisultap | 25 | 480 | 14.75 | 18.69 | 0.81 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Associated Smallholder Requirement: Company to maintain records of herbicide issue to Associated Smallholders. | <p>Smallholders: In case of chemical control of pest such as Sexava, it was done by HOPL – under supervision of PNG OPRA. Recod of Dimehypo uses for saxava control based on “Smallholders Blocks – Palm Poisoning” are as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Dvision</th> <th colspan="2">2018</th> <th colspan="2">2019</th> </tr> <tr> <th>Total Ha</th> <th>Volume used (ltr)</th> <th>Total Ha</th> <th>Volume used (ltr)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>39.73</td> <td rowspan="3">2,811.42</td> <td>48.12</td> <td rowspan="3">2,005.47</td> </tr> <tr> <td>2</td> <td>198.87</td> <td>118.57</td> </tr> <tr> <td>3</td> <td>0</td> <td>3.85</td> </tr> <tr> <td>Total</td> <td>238.60</td> <td>2,811.42</td> <td>170.54</td> <td>2,005.47</td> </tr> </tbody> </table> <p>Listed below are sample of numbers of palms poisoned in August 2019:</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Block No.</th> <th>Number of Palms</th> <th>Hectares</th> <th>Total ltr</th> </tr> </thead> <tbody> <tr> <td>Tiauru</td> <td>01-223</td> <td>241</td> <td>2.01</td> <td>21.69</td> </tr> <tr> <td>Tiauru</td> <td>01-289</td> <td>251</td> <td>2.09</td> <td>22.59</td> </tr> <tr> <td>Tiauru</td> <td>01-242</td> <td>240</td> <td>2.00</td> <td>21.60</td> </tr> <tr> <td>Wilelo</td> <td>02-752</td> <td>274</td> <td>2.28</td> <td>24.66</td> </tr> <tr> <td>Wilelo</td> <td>02-1120</td> <td>244</td> <td>2.03</td> <td>21.96</td> </tr> <tr> <td>Soi</td> <td>31-1536</td> <td>242</td> <td>2.02</td> <td>21.78</td> </tr> <tr> <td>Soi</td> <td>31-1744</td> <td>231</td> <td>1.93</td> <td>2-.79</td> </tr> <tr> <td>Matilliu</td> <td>17-101</td> <td>185</td> <td>1.54</td> <td>16.65</td> </tr> <tr> <td>Matilliu</td> <td>17-29</td> <td>248</td> <td>2.07</td> <td>22.32</td> </tr> </tbody> </table> | | | | | Dvision | 2018 | | 2019 | | Total Ha | Volume used (ltr) | Total Ha | Volume used (ltr) | 1 | 39.73 | 2,811.42 | 48.12 | 2,005.47 | 2 | 198.87 | 118.57 | 3 | 0 | 3.85 | Total | 238.60 | 2,811.42 | 170.54 | 2,005.47 | Area | Block No. | Number of Palms | Hectares | Total ltr | Tiauru | 01-223 | 241 | 2.01 | 21.69 | Tiauru | 01-289 | 251 | 2.09 | 22.59 | Tiauru | 01-242 | 240 | 2.00 | 21.60 | Wilelo | 02-752 | 274 | 2.28 | 24.66 | Wilelo | 02-1120 | 244 | 2.03 | 21.96 | Soi | 31-1536 | 242 | 2.02 | 21.78 | Soi | 31-1744 | 231 | 1.93 | 2-.79 | Matilliu | 17-101 | 185 | 1.54 | 16.65 | Matilliu | 17-29 | 248 | 2.07 | 22.32 | Yes |
| Dvision | 2018 | | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Total Ha | Volume used (ltr) | Total Ha | Volume used (ltr) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 39.73 | 2,811.42 | 48.12 | 2,005.47 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 198.87 | | 118.57 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 0 | | 3.85 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 238.60 | 2,811.42 | 170.54 | 2,005.47 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Area | Block No. | Number of Palms | Hectares | Total ltr | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tiauru | 01-223 | 241 | 2.01 | 21.69 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tiauru | 01-289 | 251 | 2.09 | 22.59 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tiauru | 01-242 | 240 | 2.00 | 21.60 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Wilelo | 02-752 | 274 | 2.28 | 24.66 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Wilelo | 02-1120 | 244 | 2.03 | 21.96 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Soi | 31-1536 | 242 | 2.02 | 21.78 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Soi | 31-1744 | 231 | 1.93 | 2-.79 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Matilliu | 17-101 | 185 | 1.54 | 16.65 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Matilliu | 17-29 | 248 | 2.07 | 22.32 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|---|----------------|--|------|--|----------|----------------|----------|----------------|----------|----------|--------|-------|----------|------------------|--|------|------|---|-----|-----|---|-------|-----|---|-----|----|-------|-------|-------|--|
| | | <p>Below are records of smallholders area treated by Dimehypo:</p> <table border="1"> <thead> <tr> <th colspan="2">2018</th> <th colspan="2">2019</th> </tr> <tr> <th>Total Ha</th> <th>Dimehypo (ltr)</th> <th>Total Ha</th> <th>Dimehypo (ltr)</th> </tr> </thead> <tbody> <tr> <td>2,077.42</td> <td>4,913.74</td> <td>487.69</td> <td>585.1</td> </tr> </tbody> </table> <p>Below are records of Glyphosate issued in smallholders area:</p> <table border="1"> <thead> <tr> <th rowspan="2">Division</th> <th colspan="2">Glyphosate (ltr)</th> </tr> <tr> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>865</td> <td>285</td> </tr> <tr> <td>2</td> <td>2,050</td> <td>790</td> </tr> <tr> <td>3</td> <td>120</td> <td>95</td> </tr> <tr> <td>Total</td> <td>3,035</td> <td>1,170</td> </tr> </tbody> </table> | 2018 | | 2019 | | Total Ha | Dimehypo (ltr) | Total Ha | Dimehypo (ltr) | 2,077.42 | 4,913.74 | 487.69 | 585.1 | Division | Glyphosate (ltr) | | 2018 | 2019 | 1 | 865 | 285 | 2 | 2,050 | 790 | 3 | 120 | 95 | Total | 3,035 | 1,170 | |
| 2018 | | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Ha | Dimehypo (ltr) | Total Ha | Dimehypo (ltr) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2,077.42 | 4,913.74 | 487.69 | 585.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Division | Glyphosate (ltr) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 2018 | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 865 | 285 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 2,050 | 790 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 120 | 95 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 3,035 | 1,170 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.3 | <p>Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. The routine prophylactic use of pesticides is prohibited unless there is a legal requirement to do so.</p> <p>- Major compliance -</p> | <p>The use of pesticide minimized as part of Continuous Improvement Plan (See criterion 8.1). There is no prophylactic use of pesticide in HOPL.</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <p>Associated Smallholder Requirement: Company to manage IPM for Associated Smallholders.</p> | <p>OPIC provide herbicide to smallholder who want to do spraying circle and path. Education has been provided to smallholders regarding IPM. Record seen: Certificate of Agricultural Safety and Crop Spraying on behalf Matilda M. Palik (VOP Block No.171783), Michael Lopese (LSS Block No.040680), John Tabari (LSS Block No.040610), Vitolo Mera (LSS Block No.040409). At the OPIC office, it was observed that poster is available to educate the smallholders regarding IPM.</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.4 | <p>The use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, shall be minimized and eliminated as part of a plan, and shall</p> | <p>Hargy Oil Palm Limited: The Plantation is no longer use paraquat. Interview, record verification and field check to chemical store, found no paraquat stored.</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | only be used in exceptional circumstances (see Specific Guidance). - Minor compliance - | | |
| | Associated Smallholder Requirement: Applies to associated Smallholders. | Smallholders: The usage of pesticide is being controlled by HOPL. The distribution of the pesticide is only through those smallholders that have undergone the Agriculture Safety and Crop Spraying conducted by OPIC and HOPL. There is no paraquat being distributed to smallholders. | Yes |
| 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 - | All agrochemical operators had been given training on the handling and application of the material. HOPL maintains a set of record for sprayer training for herbicide mixer, herbicide sprayers and smallholders. Training records were observed for date 26 September 2019 for workers of Hargy Estate, attended by 11 participants; on 27 March 2019 attended by 6 participants; and on 18 September 2019 attended by 13 participants; in Navo Estate on 29 August 2019; attended by 16 participants, on 12 August 2019; attended by 7 participants. All safety and application equipment had been provided and used by the operators. All precautions attached to the products had been observed, applied and understood by the workers. MSDS for each agrochemical used/stored in HOPL chemical shed has been made available, e.g. Glyphosate 450 g/l and Spalding Surfactant LI 700 (Propionic Acid 350 g/L + Soyal Phospholipids 350 g/L + 10-30% Surfactans). PPE has been provided for the agrochemical store keeper (i.e. face shield, apron, hand gloves, overall) and sprayer: apron, hand gloves, overall and gumboots have been used consistently. MSDS of chemical used in Hargy, Navo and Pandi Estate were available during visit. Based on interview and record verification, spraying workers at Hargy, Navo and Pandi Estate have been trained with Pesticides application and handling. | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | <p>Associated Smallholder Requirement:</p> <p>Associated Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements.</p> | Yes |
| <p>4.6.6</p> | <p>Storage of all pesticides shall be according to Safety Data Sheet requirements and recognised best practices. Used herbicide containers may, after triple rinsing, be used for transporting pre-mixed herbicide to spraying operations in the plantation. At the end of their useful lives, they shall be properly disposed of and not used for other purposes see Criterion 5.3).</p> <p>- Major compliance -</p> | Yes |
| | <p>Associated Smallholder Requirement:</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | Applies to associated Smallholders. | smallholder – issued with certificate. HOPL and OPIC conducted special training for Agricultural Safety and Crop Spraying. Certificate of Training Attendance were available, e.g. Matilda M. Palik (Matiliu VOP Block No.171783) on 30 August 2017; Michael Lopese (Malassi LSS Block No.040680) on 4 October 2018; John Tabari (Malassi LSS Block No.040610) on 30 August 2017; Vitolo Mera (Malassi LSS Block No.040409) on 4 October 2018. | |
| 4.6.7 | Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance - | <p>Hargy Oil Palm is able to demonstrate that pesticides had been applied in line with management guideline; that minimize risk and impacts. Sprayers are trained, training records were evident. Training records were observed for date 26 September 2019 for workers of Hargy Estate, attended by 11 participants; on 27 March 2019 attended by 6 participants; and 18 September 2019 attended by 13 participants; in Navo Estate on 29 August 2019; attended by 16 participants, on 12 August 2019; attended by 7 participants. The pesticide operators found to understand the use of the right nozzle, spray drift, spray quality and run-off.</p> <p>MSDS for each agrochemical used/stored in HOPL chemical shed has been made available, e.g. Glyphosate 450 g/l and Spalding Surfactant LI 700 (Propionic Acid 350 g/L + Soyal Phospholipids 350 g/L + 10-30% Surfactants). PPE has been provided for the agrochemical store keeper (i.e. face shield, apron, hand gloves, overall) and sprayer: apron, hand gloves, overall and gumboots have been used consistently.</p> <p>Pandi Estate: Chemical storekeeper, Eron Kamai has been provided with training "Chemical Applicatoin for Sprayer and Overseer, dated 19 March 2019. The training was attended by 20 sprayers, chemical storekeeper, and overseer. Titus Joseph and Dolang Mulbong (interviewed sprayers) confirmed they have attended the training. Titus Joseph and Dolang Mulbong (interviewed sprayers) have been trained for "Chemical weeding – infield path and circle spray application" dated 18 June 2019; attended by 16 sprayers.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | Associated Smallholder Requirement: Applies to associated Smallholders. | Smallholder generally performs slashing to control weeds. However, for associated smallholder who performed spraying, done by trained smallholder – issued with certificate. HOPL and OPIC conducted special training for Agriculatural Safety and Crop Spraying. Certificate of Training Attendance were available, e.g. Matilda M. Palik (Matililiu VOP Block No.171783) on 30 August 2017; Michael Lopese (Malassi LSS Block No.040680) on 4 October 2018; John Tabari (Malassi LSS Block No.040610) on 30 August 2017; Vitolo Mera (Malassi LSS Block No.040409) on 4 October 2018. | Yes |
| 4.6.8 | There shall be no aerial application of pesticides - Major compliance - | There is no aerial application of pesticides in whole Hargy Oil Palm plantation area. | Yes |
| | Associated Smallholder Requirement: Applies to associated Smallholders. | There is no aerial application of pesticides in smallholder area. | Yes |
| 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 - | All agrochemical operators had been given training on the handling and application of the pesticides. HOPL maintains a set of record for sprayer training for herbicide mixer, herbicide sprayers and smallholders. Refreshment training has been conducted regularly. Training records were observed for date 26 September 2019 for workers of Hargy Esate, attended by 11 participants; on 27 March 2019 attended by 6 participants; and on 18 September 2019 attended by 13 participants; in Navo Estate on 29 August 2019; attended by 16 participants, on 12 August 2019; attended by 7 participants. All safety and application equipment had been provided and used by the operators. All precautions attached to the products had been observed, applied and understood by the workers. | Yes |
| | Associated Smallholder Requirement: Applies to associated Smallholders. | Smallholder generally performs slashing to control weeds. However, for associated smallholder who performed spraying, done by trained smallholder – issued with certificate. HOPL and OPIC conducted special training for Agriculatural Safety and Crop Spraying. Certificate of Training Attendance were available, e.g. Matilda M. Palik (Matililiu VOP Block | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | No.171783) on 30 August 2017; Michael Lopese (Malassi LSS Block No.040680) on 4 October 2018; John Tabari (Malassi LSS Block No.040610) on 30 August 2017; Vitolo Mera (Malassi LSS Block No.040409) on 4 October 2018. | |
| 4.6.10 | <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).</p> <p>- Minor compliance -</p> | <p>During interview with sample employees at each estate compound/ Workers housing complex, they fully understand for waste management (including domestic waste). The complex condition is clean and well organized. While, during visiting the landfill in Hargy Estate and Pandi Estate, sighted the waste are disposed with separated hole. There are 5 holes which consist of Plastic Pit (fertilizer inner bag, cement bag and bit of chemical containers); Hydrocarbon pit (used tyres, some kind of pipes from mill); Metal pit (poles fibre, zinc roof, plastic rubbish container and several metals); Domestic Waste and Septic Waste. If one of pit is full loaded, then it will be dump and buried properly.</p> <p>In Hargy Estate, the Record of Triple Rinsing of Pesticide Container, dated December 2018: indicated 1 x 20 liter Glyphosate, 1x20 liters Asulox, 1x20 liters LI700 – kept for recycle.</p> <p>Hargy Estate maintains landfill record: On 28 August 2019, vehicle L76 disposed off rubbish from mill into hydrocarbon pit; On 28 August 2019, vehicle LBO538 disposed off rubbish from Baubata into scrap metal pit; on 20 September 2019, vehicle L138 disposed off store pipia plastic in Area 7 into Domestic pit. on 20 September 2019, vehicle LBO538 disposed off used chemical plastic from Urumaili Plantation into Domestic pit.</p> <p>Pandi Estate: Rubbish/Waste Disposal Register: 14 January 2019 Pandi Estate disposed off 1 loads of chemical/plastic waste – by Theo; 28 February 2019 Pandi Estate disposed off 1 loads of chemical/plastic waste – by George; 24 June 2019 Pandi Estate disposed off 1 loads of chemical/plastic waste – by Steven; all into Gamupa landfill.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | Associated Smallholder Requirement: Applies to associated Smallholders. | During field observation in smallholder’s land with two type of smallholder’s management Village Oil Palm (VOP’s) and Land State Settlement (LSS), auditor found that smallholder’s has implement waste management properly. In example: 171783 - Matilda M. Palik (VOP), 040680 – Michael Lopese (LSS); 040610 – John Tabari (LSS). The farmer disposed their wastes in rubbish/waste pit within their land, and it has separated from the housing. | Yes |
| 4.6.11 | Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance - | Specific annual medical surveillance for pesticides operator has been done by HOPL, and it was carried out on regular basis. Record regarding health condition of the pesticides operators are under “Baseline Surveillance for Sprayers”, that contains demographic data, occupational history, medical history, basic examination (eyes, nose, throat, respiratory, skin, rash, bones) to prepare conclusion on status to working with agrochemical. Records were sight for interviewed sprayer, e.g. Gideon Russel and Raymond Duatna, fitness classification are fit. Annual Medical surveillance in Navo Estate – Atata Plantation were evident for interviewed sprayer Lenni Zanza and Benson Potape, based on check on 31 July 2019 both are good for conducting chemical spraying. in Hargy Estate – Kerakera Plantation were evident for interviewed sprayer Raymond Buatna and Gideon Russel, based on check on 30 September 2019 both are good for conducting chemical spraying. Medical surveillance for Saxava team has been done on 10 October 2019 for example Eugene Kao (test result U/L 293), Davidson Sonny (U/L 294), Tidal Morgan (U/L 267), comments are satisfactory to continue sexava control activity. The medical surveillance includes trunk injector for smallholder area. For example: Willie Kos, Kevin Jocky and Colin Michael, based on check on 22 July 2019 all are good for conducting chemical works. | Yes |
| 4.6.12 | No work with pesticides shall be undertaken by pregnant or breastfeeding women. - Major compliance - | All herbicide sprayer and trunk injector are male workers. However, based on interview during field visit these male workers understood company policy regarding no work with pesticide shall be undertaken by pregnant or breastfeeding women. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| | | At the smallholder blocks, pesticide are only applied by those that have attend the Agriculture Safety and Crop Spraying conducted by OPIC and HOPL. There was no evidence observed that spraying was conducted by other parties, such as women or children. | |
| Criterion 4.7 | | | |
| An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following: | | | |
| 4.7.1 | <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>As subsidiary of SIPEF, the company recognized that a safe and healthy workplace is the most important. The Policy on Occupational Health and Safety was established which was signed by General Manager of Hargy Oil Palms Limited, issue No.4, dated 16 December 2015.</p> <p>The OHS Plan was established. The latest review was carried out on 17 June 2019 (issue No.09) prepared by the Environment & Sustainability Manager. The OHS plan was include the Hazard and risk assessment register, safety training and PPE records, OSH committee meeting, emergency procedure, medical care & accident insurance, incident/accident investigation and lost time accidents.</p> <p>The EHS inspection was conducted accordingly as seen below: Hargy Palm Oil Mill, carried out on 23 September 2019; Hargy Estate, Makakiwa Plantation (Division 1), carried out on 15 June 2019; Hargy Estate, Urumaili Plantation (Division 2), carried out on 22 June 2019; Hargy Estate, Kerakera Plantation (Division 3), carried out on 8 May 2019; Atata Plantation, Division 1 & 2, carried out on 10 September 2019; Navo Palm Oil Mill, carried out on 30 September 2019; conducted Samson Chee Barema Palm Oil Mill, carried out on 25 August 2019; conducted by Thomas Tade. Pandi Estate, Bakada Plantation, carried out on 30 August 2019.</p> <p>The latest OHS committees meeting was conducted as follow:</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>Hargy Palm Oil Mill – 28 September 2019; discussed agenda related fire extinguisher observed on floor and evidence of oil spill on ground; Hargy Estate – 26 September 2019; discussed agenda (1) drain clean up in the compound, (2) Emergency evacuation routes needs to made aware to workers, (3) Selective & Circle Spraying gangs should have separate Drinking and Washing water. Barema Mill – 25 July 2019; discussed agenda such as review of the previous meeting planned recommendation; EHS inspection checklist (compounds, workshops, stores, firefighting equipment, first aid kits) and previous internal audit non conformances; OHS performance reports; environmental incidents reports; gender related issues; social issues in the workplaces; company policies; new business agenda. Several issues discussed e.g. improper reporting of LTIs from employees after attending to BPOM Clinic; Disposable masks dust currently use by KCP maintenance personnel in workshop smouldering area apparently very ineffective. Navo Estate – Atata Plantation conducted OHS meeting on 10 September 2019. OHS performance report mentioned that First Aid certificate will be distributed; Fire extinguisher training needs to be done onsite. Navo Mill – conducted OHS meeting on 30 September 2019. Substandard condition: Safety chain block for use in confine space and lifting duties inside the mill to be inspected and approved for use by the Safety Supervisor before use by the employees. Pandi Estate – Bakada Plantation conducted OHS meeting on 30 September 2019. OHS performance report noted that there was 6 incidents this month; 25 incidents for month todate; cause: careless and ignorance to safety procedures; Corrective action: monthly administration action; Improvement opportunity: more training, wareness and monitoring; preventive measures: continuous awareness.</p> <p>Navo POM: OHS policy dissemination dated 15 February 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>Smallholders: The management of the procedure for the Smallholders is guided using a hand book titled "Gutpela rot bilong lukautim wel pam na kamap gutpela smolholda fama". Copies of which have been distributed to all new growers beginning 2011. This book contains guidelines/procedures among others: Sustainability, Harvesting standard, Fertilizer application, Block upkeep, health and safety, RSPO Compliances, and other social issues e.g HIV/AIDS, malaria, family violence. HOPL smallholder department maintain production records and field day attendance records as evidences of discussion relating to health and safety performance and for improvement.</p> | |
| 4.7.2 | <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p> | <p>The OHS risk assessment was established based on the risk assessment matrix stated in the OHS plan. The HOPL OHS Risk Assessment Register No.REG-ESD-OHS-001-10 by the Environment & Sustainability Manager, last update on 19 June 2019. The register was include the activities in the mill and estates such as laboratory, effluents ponds, treatment plant, nursery and new development area, vehicle workshop, harvesting, construction, chemical handling, stores, dispatch bay, mixing area, replanting, driving tractors, process station at mill, welding, sterilizers, reception area, boiler station and biogas plant.</p> <p>Sample in Hargy POM, the confined space entry permit was issued on 27 May 2019 for cut old tubes out and replace with new tubes at boiler station. The rescue and emergency procedures has been issued and understood by the standby and rescue persons.</p> <p>Sample in Barema POM; Elevated work permit (FOR-ENG-GEN-003-02), issued on 27 September 2019, building area: Threshing Sattion, Description of task: Cleaning up roof top, estimated height 30 meters. Job Safety & Environment Analysis No.HOPL-FOR-OHS-004-01, issued on 27 September 2019, job description: carry out roofing cleaning at thresher station building. Confined Space entry permit, issued on 25 August 2019; location: Crude oil/Underflow Tank; number of employee assigned: two;</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>names: Julai K. and Mathew K, Team Leader: Raphael N.; Work description: Removal sand in the tank.</p> <p>Sample in Navo POM, the confined space entry permit was issued on 17 September 2019 for location Treshing Drum #1. Name: Camilus and Alfred. Description of Work: Welding Rod and Flat. The gas test was done before started their work and found safe to enter at 20.8% of oxygen level. Job Safety & Environment Analysis were evident dated 22 August 2019, for Installation of the condensate pit collapse roof – new installation; and dated 21 August 2019, for Installation of the boiler collapse roof – new installation. JSEA developed by OHS Supervisor and Safety Assistant, then approved by Mill Manager. The gas detector was last calibrated on 24 March 2016 based on Instrument Calibration Report issued by MSA the safety company.</p> <p>Monitoring of noise level are done at each palm oil mill. There are some area with noise level above 85 dB, such as at Kernel Station, Boiler Station and Sterilizer Station. It was observed that all workers in that area are wearing earmuff.</p> <p>During site visit, interview with workers shown that they understand and applied accordingly the precautions attached to the chemicals or products and wear PPE.</p> | |
| | <p>The smallholders are being educated on the health and safety through the Field Days conducted by HOPL and OPIC. It is confirmed through interview with smallholders that they have attended the Field Days.</p> <p>Sample of Field Day record: 29 January 2019. Location: Cenaka Division; Urumaili Sub-Division. Officer: Dessie Sapau. Attended by 22 smallholders (15 female, 7 male). Topic of Field day is Circle Weeding Demonstration. The some point to presented during field day is: Market place preparation, Net installation, Circle and Path weeding, Manual weeding, Chemical Weeding, Loose fruit collection, Advantages and Disadvantages between Manual and Chemical Weeding.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>27 March 2019. Location: Meramera Division; Malaso Sub-Division. Officer: Cleophas, Peter Mopa, Christopher and Temah. Attended by 25 smallholders (7 female, 18 male). Topic: BMP, Production, Fertilizer Application and Mama Loose Fruit (MLF). The field day training and demonstration are: Pruning, U-Box Stacking, Harvesting technique; Fertilizer application (partnership with OPRA Officer); The rest was same as above theme/topics.</p> <p>5 September 2019. Location: Tiauru LSS Block 010273. Attended by 34 LSS smallholders (13 female and 21 male). Facilitator: Smallholders Agricultural Assistant S (SHAAS) Team. Training Day topic: Crop Quality, Buffer Zones and Cover Crop.</p> | |
| 4.7.3 | <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Protective equipment as defined in Safety Data Sheets or Standard Operating Procedures shall be available to, and used by, all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation and harvesting.</p> <p>- Major compliance -</p> | <p>All workers involved in the operation have been adequately trained in safe working practices. Training Scheduled for 2019 was established. Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Training of safe working practice has include subject for workers exposed to high noise levels.</p> <p>Record seen: Muster Attendance Record dated 3 March 2019, attended by 18 participants from Engineering Department. Training records were observed for date 26 September 2019 for Spraying workers of Hargy Esate, attended by 11 participants;</p> <p>Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS. The safety data sheets were available at site, e.g.: Glyphosate 450 g/l; Spalding Surfactant LI 700 (Propionic Acid 350 g/L + Soyal Phospholipids 350 g/L + 10-30% Surfactans); and Ally 20DF (Metsulfuron methyl 20DF).</p> <p>Record seen: PPE issuance based on record Integrated Stock and Work Requisition dated 22 September 2019. FF35: Personal Protective Equipment (PPE) Issue & Record Sheet, dated 30 August 2019, item: Gum</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|--|------------|----------------|---------|---------|----------------|---------------------|-------|------------|-----------------|------------------|-------|------------|-----------------|-----------------------------|-------|------------|-------------------|----------------------|-------|-------|-----------------|--------------------|-----------------------|-----------|-----------------|--------------------|-----------------------|----------|------------------|--------------------|-----------------------|----------|-----------------|-----------------------------|-------------|----------|------------------|------------|-------------|----------|--|
| | | <p>Boots for Dorin Jeas (Sanitation); dated 7 May 2019, item: Safety boot for Paul Numba (Truck Driver).</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1 October 2019</td> <td>First Aid awareness</td> <td>Staff</td> <td>Barema POM</td> </tr> <tr> <td>19-20 July 2019</td> <td>Safety Awareness</td> <td>Staff</td> <td>Barema POM</td> </tr> <tr> <td>11 January 2019</td> <td>Volcano Eruption Evacuation</td> <td>Staff</td> <td>Barema POM</td> </tr> <tr> <td>26 September 2019</td> <td>Spraying SOP and PPE</td> <td>Staff</td> <td>Hargy</td> </tr> <tr> <td>17-19 June 2019</td> <td>First Aid Training</td> <td>PNG Red Cross Society</td> <td>Hargy POM</td> </tr> <tr> <td>12-14 June 2019</td> <td>First Aid Training</td> <td>PNG Red Cross Society</td> <td>Navo POM</td> </tr> <tr> <td>21-22 March 2018</td> <td>First Aid Training</td> <td>PNG Red Cross Society</td> <td>Navo POM</td> </tr> <tr> <td>10 January 2019</td> <td>Smoke free workplace policy</td> <td>Samson Chee</td> <td>Navo POM</td> </tr> <tr> <td>15 February 2019</td> <td>OHS Policy</td> <td>Samson Chee</td> <td>Navo POM</td> </tr> </tbody> </table> | Date | Training Topic | Trainer | Remarks | 1 October 2019 | First Aid awareness | Staff | Barema POM | 19-20 July 2019 | Safety Awareness | Staff | Barema POM | 11 January 2019 | Volcano Eruption Evacuation | Staff | Barema POM | 26 September 2019 | Spraying SOP and PPE | Staff | Hargy | 17-19 June 2019 | First Aid Training | PNG Red Cross Society | Hargy POM | 12-14 June 2019 | First Aid Training | PNG Red Cross Society | Navo POM | 21-22 March 2018 | First Aid Training | PNG Red Cross Society | Navo POM | 10 January 2019 | Smoke free workplace policy | Samson Chee | Navo POM | 15 February 2019 | OHS Policy | Samson Chee | Navo POM | |
| Date | Training Topic | Trainer | Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 October 2019 | First Aid awareness | Staff | Barema POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19-20 July 2019 | Safety Awareness | Staff | Barema POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 January 2019 | Volcano Eruption Evacuation | Staff | Barema POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26 September 2019 | Spraying SOP and PPE | Staff | Hargy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17-19 June 2019 | First Aid Training | PNG Red Cross Society | Hargy POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12-14 June 2019 | First Aid Training | PNG Red Cross Society | Navo POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21-22 March 2018 | First Aid Training | PNG Red Cross Society | Navo POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 January 2019 | Smoke free workplace policy | Samson Chee | Navo POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 February 2019 | OHS Policy | Samson Chee | Navo POM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.7.4 | <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p> | <p>The responsible person for health and safety in company's estates and mills is Environment and Sustainability Manager. The latest OHS committees meeting was conducted as follow:</p> <p>Hargy POM – 28 September 2019; discussed agenda related fire extinguisher observed on floor and evidence of oil spill on ground; Hargy Estate – 26 September 2019; discussed agenda (1) drain clean up in the compound, (2) Emergency evacuation routes needs to made aware to workers, (3) Selective & Circle Spraying gangs should have separate Drinking and Washing water;</p> <p>Barema POM – 25 July 2019; discussed agenda such as review of the previous meeting planned recommendation; EHS inspection checklist (compounds, workshops, stores, firefighting equipment, first aid kits) and previous internal audit non conformances; OHS performance reports; environmental incidents reports; gender related issues; social issues in the workplaces; company policies; new business agenda. Several issues</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>discussed e.g. improper reporting of LTIs from employees after attending to BPOM Clinic; Disposable masks dust currently use by KCP maintenance personnel in workshop smouldering area apparently very ineffective.</p> <p>Navo POM – conducted OHS meeting on 30 September 2019. Substandard condition: Safety chain block for use in confine space and lifting duties inside the mill to be inspected and approved for use by the Safety Supervisor before use by the employees.</p> <p>Pandi Estate – Bakada Plantation conducted OHS meeting on 30 September 2019. OHS performance report noted that there was 6 incidents this month; 25 incidents for month todate; Cause: careless and ignorance to safety procedures; Corrective action: monthly administration action; Improvement opportunity: more training, awareness and monitoring; Preventive measures: continuous awareness.</p> | |
| 4.7.5 | <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the English and Tok Pisin languages. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available from Divisional and Mill offices to all teams or groups of workers. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p> | <p>Accident and emergency procedures namely Emergency Response Procedures No.ERP-ESD-GEN-001-08, dated 22 June 2019. Evacuation Response Plan are available for each emergency stations, for examples No.ERP-ESD-GEN-001-09 for Volcano Eruption; No.ERP-ESD-GEN-002-09 for Flooding Rivers; No.ERP-ESD-GEN-003-09 for Mill Factories Fires; No.ERP-ESD-GEN-004-09 for Bialla Tank Farm and Tanker Terminal Fire; No.ERP-ESD-GEN-005-09 Bialla Tangker Terminal Oil Spill; No.ERP-ESD-GEN-008-09 for Motor Vehicle Accident; and No.ERP-ESD-GEN-009-09 for Fire Emergency Response. The plans have been communicated to employees, contractors and visitors. The procedure was available in English and Tok Pisin language. Emergency Response Plan, latest revision on 27 June 2019.</p> <p>Emergency Drill Plans and Scenarios for 2019 was available, covers Tanker Terminal Oil Spill, Fire Drill, Chemical Spill Response, Medical Emergency, CPO Tanker Spill on road, MVA response, volcano eruption evacuation, flooding rivers evacuation response and fuel spill. Records on all accidents kept and summary sent to Head Office.</p> | Yes |

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| | <p>The safety induction was conducted by the management to the auditors before going for field/mill visit. The company has established Emergency Drill Plan 2019, which conducted on February and July, and next one will be conducted in December. Emergency drill, Tanker Terminal Oil Spill was last conducted on 22 February 2019 at Hargy Mill – Oil Dispatch Bay. Emergency Drill Report in Barema was evident, e.g. dated 18 July 2019 for Fire & General Evacuation Response Drill, location: Clarification Station, Drill duration: 30 minutes, attended by 57 employees.</p> <p>Navo POM has the Fire Fighting Equipment Layout, comprise of DCP powder (9kg/4.5kg/4kg), Foam (9kg), CO2 (5kg), Fire Hydrant, Fire Hose Reel and Smoke Alarm.</p> <p>Navo POM Emergency Evacuation from the Mt. Ulawun eruption report was available, prepared by Samson Chee (Navo OHS/RSPO Supervisor).</p> <p>Workers trained in First Aider were present in the mill and field operations. They were trained by Papua New Guinea Red Cross Society. First aider training certificate were sighted, e.g. dated 19 June 2019, Reg. No. PNGRCS-473, valid for three years. It was sighted first aid kits at Hargy POM, Barema POM, Hargy Estate – Kerakera Plantation office. All the items in the first aid kit were found valid.</p> <p>First Aid Certificate for Barema POM were available e.g. Thomas Tade (PNGRCS CFA-151) valid until 24 April 2021; Gideon Walaunia (PNGRCS CFA-477), valid until 19 June 2022; Julai Kubar (PNGRCS CFA-479), valid until 19 June 2022. Training attendance list for First Aid awareness in Barema POM was available dated 1 October 2019, attended by 7 persons.</p> <p>First Aid Certificate for Navo POM were available e.g. Steward Wandu (PNGRCS CFA-462), valid until 14 June 2022; James Lebut (PNGRCS CFA-129), valid until 22 March 2021; Benjamin Ulgu (PNGRCS CFA-129), valid until 22 March 2021.</p> <p>First Aid Certificate for Navo Estate were available e.g. Jim Warigi (PNGRCS CFA-451), valid until 14 June 2022; Bobby Kimat (PNGRCS CFA-475), valid until 19 Jun 2022; Willie Meru Maneke (PNGRCS CFA-485), valid until 19</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>Jun 2022. Training attendance list for First Aid awareness in Barema POM was available dated 1 October 2019, attended by 7 persons.</p> <p>The management review on accident cases on monthly basis during OHS meeting. All Sighted records of accidents and emergency were kept at HQ office. From the records, found that the most injuries (nature of injury) were soft tissue injury (harvesting). First Aid Kit check conducted monthly. The site have Hargy Mill Fire Extinguisher Register, last inspection conducted on 19 September 2019 and next inspection on 30 October 2019. Sighted during site visit, all the fire equipment's were in good condition. Fire Extinguisher service are conducted twice in a year, it was scheduled at February and August each year. The last services conducted on 23-28 September 2019 in all Palm Oil Mill and Estate. Fire extinguisher at all site found valid and in good condition.</p> <p>In Pandi Estate: Michael Silpaga is the trained first aider for plantation, Certificate Papua New Guinea Red Cross Society Reg No.PNGCFA-152 dated 24 April 2018 – valid for 3 years. Solomon Pagaurea is the trained first aider for plantation, Certificate Papua New Guinea Red Cross Society Reg No.PNGRCS-CFA-067, dated 31 January 2017 – valid for 3 years. Linda Keto is the trained first aider in Vehicle Workshop, Certificate Papua New Guinea Red Cross Society Reg No.PNGRCS-CFA-144, dated 24 April 2018 – valid for 3 years.</p> <p>Pandi VWS have first aid kit and trained first aider onsite. The last first aid kit check was on 19 June 2019. The content of first aid kit: kidney dish medium, kidney dish small, scissors, dressing forcep, disposable glove, wooden applicator, eye pad, cotton balls, gauze absorbent, plaster (leukoplast), elastic bandage, triangular bandage, band aid, antiseptic powder, optrex eye solution, emergency blanket, resuscitation face shield, anti-inflammatory cream, antiseptic solution/iodine, basic dressing.</p> | |

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| | | The emergency eye wash in Pandi VWS is working with 2-way and pressurized water supply. | |
| 4.7.6 | All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance - | <p>Medical care is provided to all the employees. Each mills and plantation have clinic for handling health and accident. If unit's clinic cannot handle the incident, then patient will be referred to central clinic at Hargy POM. All the workers are local and they are covered under Workers Compensation Act 1978. There are company doctor in each site, e.g. for Navo POM and Estate, the clinic and the doctor located at Atata Plantation Compound. For Pandi Estate, company clinic located at Bakada Plantation office complex.</p> <p>During the assessment HOPL still have contract of medical, health and worker compensation for staffs with MARSH & McLENNAN COMPANIES as agent. The Insurance Manual for Hargy Oil Palms Limited was sighted at CEO office dated 31 December 2018.</p> <p>Detail of insurance are as follows: Workers Compensation Excluding WETHA Extension; policy number W0015566. Insurer: QBE Insurance (PNG) Ltd – 100%; covering insured's legal liability to workers under the Workers Compensation Act 1978 (as amended). National Managers Medical (Marsh Medicare); policy number HOPL 31121617. Insurer: Capital Life Insurance Company Limited – 100%. Scope (1) Medical & Hospital benefits, covering eligible reimbursement of medical expenses following sickness or hospitalization of nominated employee and his/or declared dependants on application including natural parents. (2) Persona; Accident (Death by Accident), covering loss of life (Death) resulting from accidental causes (as defined) 24 hours, 7 days a week.</p> <p>It was noted email from MARSH, dated 4 October 2019 regarding Insurance update. Stated that medical policy has been renewed for 12 month period with Capital Life; other policies are on a 14 days extension to 4.00 pm on 14 October 2019. The extension is fully supported by all ISR participants.</p> | Yes |

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| | | <p>Eligibility for NASFUND: 3 months working of period (6% Employees; 8.4% for Employers).</p> <p>Medical Insurance not charge to the workers, the company only provide the medical services such as medical treatment, clinic,</p> | |
| 4.7.7 | <p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p> | <p>The company can demonstrated Incident/Accident Report No.FOR-ESD-GEN-002-07. For example:</p> <p>Barema POM: date of incident/accident 15 August 2019; reported by Jerry Tago; recorded by Thomas Tade; location Boiler; person involve in the incident/accident: Joe Lukara; designation Contractor-Welder. Brief description: during the process of cutting the 2" steam pipeline with 4" grinder which had a 4" size cutting disc accidentally had the grinder jumping out from its cutting position and landed right on his lower jaw resulting in an incise causing a soft tissue injury. Cause: the 4" cutting disc currently in use is reported to be slightly thinner (2.5 mills-Oricraft)/weaker than the previously used (2.5 mills-Flex vit) believed to be stronger or appropriate for cutting. Elimination: cease ordering oricraft 2.5 mills. Substitution: only use the flex vit 2.5 mills. Administartion: Injured contractor refered to Barema POM Clinic for medical treatment on soft tissue injury.</p> <p>In Navo POM, sampled date of incident/accident 28 July 2019; reported by Gopi Nathan; recorded by Samson Chee; location GM Production house; person involve in the incident/accident: Tano Arasu; designation Mill Ex-Guard. Equipment: C211. Brief description: Tano was trying to move the vehicle in the garage but accidentally got hit on the rock at the car park and got the car bent on the sides. Cause: He was not competent enough to drive. Administartion: Stop him from driving company C-fleets. Status: Closed on 29 September 2019.</p> <p>In Pandi Estate, sampled date of incident/accident 20 September 2019; reported by Benford Jerry; recorded by Francis Saput; location Alaba Extension CCID 15A09; person involve in the incident/accident: Benford Jerry; designation TJ12 Driver; Equipment used/involved in the</p> | Yes |

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| | | <p>incident/accident: TJ12 Tractor. Brief description: Benford Jerry is a FFB Tractor Driver and has not been approved by trainer to do slashing, without authorization from transport section has been engaged in path slashing from his immediate boss. Cause: inexperience and unauthorized driver capsized TJ12 blaming smooth tyres and loose volcanic soil. Administration: careless driver issue termination on 25 September 2019. Status closed.</p> <p>In Navo Estate, sampled date of incident/accident: 13 September 2019; reported by Mosley David; recorded by Berry Tolak; location Avenue 28, Atatta 2 Field 5; person involve in the incident/accident: Mosley David; designation Tractor Driver; Brief description: Sand and dust particles from the volcano that were deposited in the palm leaves hit his face and went into his right eye. Cause: right eye swollen and painful causing difficulty in vision. Administration: Transport EFB Tractor Driver need to be issued with safety glass. Status closed.</p> <p>Records on Lost Time Accident (LTA) metrics was maintained by company doctor at Hargy Clinic. Record of accident statistic as shown below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>115</td> </tr> <tr> <td>2019</td> <td>442</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p> <p>LTA summary report as of August 2019 mentioned that 173 cases were reported; number of hour lost was 10,688 hours; working day lost per month recorded at 55; incident rate per month recorded 21.625.</p> | Year | LTA | 2018 | 115 | 2019 | 442 | |
| Year | LTA | | | | | | | | |
| 2018 | 115 | | | | | | | | |
| 2019 | 442 | | | | | | | | |
| <p>Criterion 4.8 All staff, workers, smallholders and contract workers are appropriately trained.</p> | | | | | | | | | |
| 4.8.1 | A formal competency based training programme shall be in place that covers all aspects of the RSPO Principles and | HOPL Human Resources Workforce Development has established training Program for 2019. Training program consist of inhouse training and external training. Examples of inhouse training subject in plantation | Yes | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>Criteria, and that includes regular assessments of training needs and documentation of the programme.</p> <p>- Major compliance -</p> | <p>department: circle weeding, herbicide training, nursery culling, fertilizer, harvesting standard and transport standard, Black Bunch Count (BBC). Examples of inhouse training subject in Mill and Vehicle Workshop Department: Environment, measurement & conversions, John Deere 5075E service training, Caron Operator training, Volvo training, working on height & heavy training, Boiler and Turbine Operators license renewal training.</p> <p>Based on Atata Plantation Monthly Training Program 2019, the training program are: Harvesting Standard – harvester and Spraying standard (July); Harvesting standard – LFC and Pest & Disease (August); Harvesting standard – wheeler and Fertiliser application standard (September); Harvesting Standard – harvester and Spraying standard and spraying standard (October); Harvesting standard – LFC and Pest & Disease (November); Harvesting standard – wheeler and Fertiliser application standard (December).</p> <p>External training courses: Course: Saw Doctor, Code: APP600; Venue: Lae Timber Forestry Training College; Time/duration: 2 month; Facilitator: Lae Timber Forestry Training College; Date: 27 May 2019 to 17 July 2019. Status: Closed. Target audience: Apprentice Only. Course: VMware, Code: Nil; Venue: Datec Head Office (POM); Time/duration: 5 days; Facilitator: Datec; Date: 6-10 May 2019. Status: Closed. Target audience: IT Staff Only. Course: 057 – Autocad Design (2D & 3D) Intermediate, Code: Nil; Venue: Holiday Inn Hotel (POM); Time/duration: 2 days; Facilitator: Bluescop Chartered Engineers (BCE); Date: 8-9 July 2019. Status: Closed. Target audience: Nominated Engineering Staff Only.</p> <p>Training program is available in monthly basis. For the competency or specific training program is refer to relevant Department. HR Department only collect and arrange the general training as mandatory by the</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>company, and request basis based on training needs to related department. In Example: In House Training September 2019: Title: Fire Extinguisher Practical Venue: Navo Time/Duration: 2 hours/9.00 – 11.00 am Facilitator: Samson Chee Allocated Day: Wednesday 4 September 2019. Target participants: Domestic Servant/House Servant.</p> <p>This training program is based on email request from David Waim to Samson Chee (as Trainer) dated 10 September 2019. The training need to be held is for awareness of practical and theoretical with targeted participants is domestic servant, wives of executive, senior and junior staff, security guards, genset attendants, bowserman.</p> <p>In-House Training October 2019: Title: Supervising Others Skills Venue: Hargy Area 8 Time/Duration: 2 days/8.00 am – 4.30 pm Facilitator: Matthew Daniels Allocated Day: 17-18 October 2019 Targeted participant: Supervisors Source of training request: Email from Thomas Kamong on 23 September 2019 to Matthew Daniels.</p> <p>In-House Training October 2019: Title: Light Vehicle safe defensive driving Venue: Hargy Area 8 Time/Duration: 3 days/7.30 am – 4.30 pm Facilitator: Lloyd Katao Allocated day: 28-30 October 2019 Targeted participants: C fleet drivers only</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>Source of training request: initiative of Matthew Daniels by email to request the training. Email dated 1 October 2019 to Lloyd Katao.</p> <p>In-House Training October 2019: Title: Infield and Roadside Harvesting standards Venue: Hargy Area 8 Time/Duration: 1 day/9.30 am – 1.00 pm Facilitator: Lloyd Katao Allocated day: 21 October 2019 Targeted participants: Overseer and Supervisors across the plantation. Source of training request: initiative of Matthew Daniels by email to request the training. Email dated 1 October 2019 to Lloyd Katao. This training is part of Plantation Training Assessment in October.</p> <p>Hargy Estate: In Kerakera Plantation, training related to Frond stacking and stock cutting “V” knots black bunches and bunch lining dated 28 August 2019. The training attended by 11 harvesters; 6 loose fruit collectors and 2 overseer. In Kerakera Plantation, training Fertilizer placement, calibration and safety dated 8 May 2019. The training attended by 6 fertilizer applicators and 2 fertilizer wheelers. Sampled fertilzier applicators: Jenita Pire and Rose Daniel. In Makakiwa Plantation, training Fertilizer application method, safety and calibration carried out on 16 April 2019 – was attended by 7 fertilizer applicators.</p> | |
| <p>Associated Smallholder Requirement: OPIC and Company Smallholder departments to provide advice and ongoing support to associated Smallholders through field days and visits to Smallholder blocks.</p> | <p>The smallholders are being educated on the good agricultural practice (harvesting, fertilizer, upkeep), environmental, social, health and safety through the Field Days conducted by HOPL and OPIC. It is conformed through interview that smallholders have attended Field Days. Sample of Field Day record: 29 Jan 2019. Location: Cenaka Division; Urumaili Sub-Division. Officer: Dessie Sapau. Attended by 22 smallholders (15 female, 7 male). Topic of Field day is Circle Weeding Demonstration. The some point to presented</p> | <p>Yes</p> |

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| | | <p>during field day is: Market place preparation, Net installation, Circle and Path weeding, Manual weeding, Chemical Weeding, Loose fruit collection, Advantages and Disadvantages between Manual and Chemical Weeding.</p> <p>27 March 2019. Location: Meramera Division; Malaso Sub-Division. Officer: Cleophas, Peter Mopa, Christopher and Temah. Attended by 25 smallholders (7 female, 18 male). Topic: BMP, Production, Fertilizer Application and Mama Loose Fruit (MLF). The field day training and demonstration are: Pruning, U-Box Stacking, Harvesting technique; Fertilizer application (partnership with OPRA Officer); The rest was same as above theme/topics.</p> <p>5 September 2019. Location: Tiauru LSS Block 010273. Attended by 34 LSS smallholders (13 female and 21 male). Facilitator: Smallholders Agricultural Assistant S (SHAAS) Team. Training Day topic: Crop Quality, Buffer Zones and Cover Crop. This forum is adequate to discuss and train the smallholders organized by the organization.</p> | |
| 4.8.2 | <p>Records of training undertaken and competency achieved shall be maintained for each employee.</p> <p>- Minor compliance -</p> | <p>Sample of personal employee training record "Employee Details and Condition:</p> <ol style="list-style-type: none"> 1. Joel Temon (WB Clerk Hargy Mill). Payroll key: 00256. Hargy POM. Training: Refresher training 24 July 2019; RSPO supply chain 26 July 2019; Revised responsible plantation policy 2 July 2019; HOPL Supply chain SOP-CPO Mill 16 April 2016. 2. Ben Simbia (Capstand/Sterilizer Attendant Inlet Hargy Mill). Payroll key: 00505. Training: SOP 29 July 2019; Mill SOP Refresher 30 August 2018; Revised responsible plantation policy 2 July 2018. 3. Seni Som (Boiler attendant Hargy Mill). Payroll key: 04861. Hargy POM. Training: Boiler attendant hargy mill training 15 September 2019; Boiler operator Hargy Mill 8-14 July 2019; Cleaner Office Bialla Vehicle Work Shop 4 March – 8 July 2019; 4. William Misilo (Power House Operator Hargy Mill). | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>Training Certificate: Boilers and Turbines Attendants Course (9-10 Feb 2016), organized by South Pacific Employment Institute and Site Skills Training, Brisbane. Certificate of Attainment issued by Southpac Industrial Training Solution PNG NTC ACC No. 077. Completing Boiler and Turbine Instruction Course in Accordance With Australian Standard Requirements & Within Provision of National Training Council, dated 19 May 2018. Boiler and Turbine Training by HOPL, dated 29-30 May 2019.</p> <p>In Hargy POM: Southpac Industrial Training PNG NTC ACC No.077 for Boiler and Turbine Instruction Course under name Mathew Awamu, dated 28 May 2019. Southpac Industrial Training PNG NTC ACC No.077 for Boiler and Turbine Instruction Course under name Wesly Baiai, dated 28 May 2019. Southpac Industrial Training PNG NTC ACC No.077 for Boiler and Turbine Instruction Course under name Noa Nureo, dated 28 May 2019.</p> <p>In Navo POM: Southpac Industrial Training PNG NTC ACC No.077 for Boiler and Turbine Instruction Course under name Adolf Roku, dated 28 May 2019. Papua New Guinea Trade Licence Act 1969-1970 No.1099 name Paul Goma as Boiler Attendant, dated 12 July 2019 – 13 June 2020. Papua New Guinea Trade Licence Act 1969-1970 No.1233 name Mesulam Kanai as Boiler Attendant, dated 12 July 2019 – 13 June 2020. Papua New Guinea Trade Licence Act 1969-1970 No.734 name David Letefoi as Boiler Attendant, dated 12 July 2019 – 13 June 2020. Papua New Guinea Trade Licence Act 1969-1970 No.1043 name Gabriel Rere as Boiler Attendant, dated 12 July 2019 – 13 June 2020. Papua New Guinea Trade Licence Act 1969-1970 No.1183 name Herman Smith as Boiler Attendant, dated 12 July 2019 – 13 June 2020.</p> | |
| <p>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</p> | | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|---|--------|--------|---------|------------|--|--|--|---------------|--------------------|----------------------------|------------------------------|---------------------------|---|--|--|---------------|-------------------------------------|---|------------------------------|----------------|-------------------------------------|----------------------------|------------------------|---------------|--|--|--|------------------------------|----------------------|--|---|------------------------------|---------------------|-------|--|------------------------|-------------------------|---------------------|---------------------|------------|
| <p>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.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>5.1.1</p> | <p>An environmental impact assessment (EIA) shall be documented and updated every ten years. - Major compliance -</p> | <p>Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-ESD-EMS-001-17, latest review 18 February 2019. The impacts identified:</p> <table border="1" data-bbox="1115 675 1895 1334"> <thead> <tr> <th>Activity</th> <th>Aspect</th> <th>Impact</th> <th>Control</th> </tr> </thead> <tbody> <tr> <td colspan="4">Plantation</td> </tr> <tr> <td>Land clearing</td> <td>Vegetation removal</td> <td>Flora & fauna habitat loss</td> <td>Environment permit condition</td> </tr> <tr> <td>Buffer zone establishment</td> <td>Reduce soil erosion; Habitat protection</td> <td>Water contamination; Biodiversity protection</td> <td>Environment permit condition, buffer zone monitoring</td> </tr> <tr> <td>Land clearing</td> <td>Oil palm planting; Soil disturbance</td> <td>Loss of gardening land; Cultural heritage/site damage</td> <td>Environment permit condition</td> </tr> <tr> <td>Chemical usage</td> <td>Mixing/spillage, incorrect spraying</td> <td>Water & soil contamination</td> <td>Supervision & training</td> </tr> <tr> <td colspan="4">Palm Oil Mill</td> </tr> <tr> <td>Boiler operation & steam use</td> <td>Ash & smoke emission</td> <td>Air quality/temperature/visual amenity</td> <td>Grit arrestor, smoke emission monitoring, ash sprinkler</td> </tr> <tr> <td>Boiler operation & steam use</td> <td>Safety release blow</td> <td>Noise</td> <td>Exhaust silencer and operator training</td> </tr> <tr> <td>Chemical storage & use</td> <td>Storage, spillage & use</td> <td>Water contamination</td> <td>Bunding, spill kits</td> </tr> </tbody> </table> | Activity | Aspect | Impact | Control | Plantation | | | | Land clearing | Vegetation removal | Flora & fauna habitat loss | Environment permit condition | Buffer zone establishment | Reduce soil erosion; Habitat protection | Water contamination; Biodiversity protection | Environment permit condition, buffer zone monitoring | Land clearing | Oil palm planting; Soil disturbance | Loss of gardening land; Cultural heritage/site damage | Environment permit condition | Chemical usage | Mixing/spillage, incorrect spraying | Water & soil contamination | Supervision & training | Palm Oil Mill | | | | Boiler operation & steam use | Ash & smoke emission | Air quality/temperature/visual amenity | Grit arrestor, smoke emission monitoring, ash sprinkler | Boiler operation & steam use | Safety release blow | Noise | Exhaust silencer and operator training | Chemical storage & use | Storage, spillage & use | Water contamination | Bunding, spill kits | <p>Yes</p> |
| Activity | Aspect | Impact | Control | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Plantation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Land clearing | Vegetation removal | Flora & fauna habitat loss | Environment permit condition | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Buffer zone establishment | Reduce soil erosion; Habitat protection | Water contamination; Biodiversity protection | Environment permit condition, buffer zone monitoring | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Land clearing | Oil palm planting; Soil disturbance | Loss of gardening land; Cultural heritage/site damage | Environment permit condition | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Chemical usage | Mixing/spillage, incorrect spraying | Water & soil contamination | Supervision & training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Palm Oil Mill | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Boiler operation & steam use | Ash & smoke emission | Air quality/temperature/visual amenity | Grit arrestor, smoke emission monitoring, ash sprinkler | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Boiler operation & steam use | Safety release blow | Noise | Exhaust silencer and operator training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Chemical storage & use | Storage, spillage & use | Water contamination | Bunding, spill kits | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Criterion / Indicator | | Assessment Findings | | | | Compliance | |
|-----------------------|--|---|---|------------------------------|---|------------|--|
| | | POME treatment | Inadequate treatment & overflow | Water contamination | Treatment pond, drain, | | |
| | | POME irrigation | Run offs, pipe leakage, trench overflow | Water and soil contamination | Training, supervision, monitoring | | |
| | | Petroleum hydrocarbons | Leaks and spillage | Water and soil contamination | Bunding, spill kit | | |
| | | Solid waste disposal (hazardous chemical) | Waste material | Visual amenities | Designated landfills, recycling | | |
| | | Waste oil | Waste disposal | Water contamination | Burn in boilers/recycle | | |
| | | CPO transport by road tanker | Road accident/ accidental spillage/ spillage to sea | Water contamination | Training and supervision | | |
| | | Workshop | | | | | |
| | | Fuel & lubricant storage | Fuel/lubricant spill | Water & soil contamination | Triple interceptor, spill kit, daily inspection | | |
| | | Battery acid storage & use | Spill, leak | Soil contamination | Supervision, training on use | | |
| | | Genset servicing | Incorrect waste disposal, used filters, contaminated solid waste disposal | Water & soil contamination | Landfill, training, supervision | | |
| | | Construction | | | | | |
| | | Housing site preparation | Vegetation removal | Flora & fauna loss | Pre-planning supervision | | |
| | | Septic waste water treatment & disposal | Tank desludging | Water & soil contamination | Regular pump out, training, supervision, | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | | | | | | | | | | | |
|---|---|--|--------------------|----------------------------|--|---------------------|---------|----------------|------|---|---|-------------|--------------|---|---------------------|----------------------|-----------------|-----|
| | | | | | separate from wells & bores | | | | | | | | | | | | | |
| | | Central Stores | | | | | | | | | | | | | | | | |
| | | Fuel transfer from ship to bulk tank | Spillage | Soil & water contamination | Training & supervision | | | | | | | | | | | | | |
| | | Offices, Medical & Others | | | | | | | | | | | | | | | | |
| | | Gravel extraction | Vegetation removal | Loss of wildlife corridor | Rehabilitation as per Environmental Permit | | | | | | | | | | | | | |
| | | <p>Navo POM: Company's Environmental Policy have been disseminated on 20 February 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> | | | | | | | | | | | | | | | | |
| 5.1.2 | <p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.</p> <p>- Minor compliance -</p> | <p>Hargy Oil Palms Limited has prepared Environment Management Plan, based on aspect-impact identification; document entitled "Action Plan for Continual Improvement in Sustainable Performance No.PLN-ESD-GEN-001-016" prepared in 15 March 2019.</p> <p>Environment Improvement Plan dated 15 March 2019:</p> <table border="1"> <thead> <tr> <th>Planned Improvement</th> <th>Outcome</th> <th>Responsibility</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Conduct and document a full Environmental Impact Assessment for HOPL operation, covering the entire supply base (5.1)</td> <td>Identify emerging environmental impact and supporting future policy development</td> <td>ESD Manager</td> <td>Jan-Dec 2019</td> </tr> <tr> <td>Installation of water meter in all water intake for compound area (4.4)</td> <td>Improved compliance</td> <td>Construction Manager</td> <td>Dec 2018 – done</td> </tr> </tbody> </table> | | | | Planned Improvement | Outcome | Responsibility | Date | Conduct and document a full Environmental Impact Assessment for HOPL operation, covering the entire supply base (5.1) | Identify emerging environmental impact and supporting future policy development | ESD Manager | Jan-Dec 2019 | Installation of water meter in all water intake for compound area (4.4) | Improved compliance | Construction Manager | Dec 2018 – done | Yes |
| Planned Improvement | Outcome | Responsibility | Date | | | | | | | | | | | | | | | |
| Conduct and document a full Environmental Impact Assessment for HOPL operation, covering the entire supply base (5.1) | Identify emerging environmental impact and supporting future policy development | ESD Manager | Jan-Dec 2019 | | | | | | | | | | | | | | | |
| Installation of water meter in all water intake for compound area (4.4) | Improved compliance | Construction Manager | Dec 2018 – done | | | | | | | | | | | | | | | |

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|-----------------------|--|--|---|------------------------------|----------------------------|------------|
| | | Installation of triple interceptor at Hargy bowser drain (4.4) | Reduce pollution | Construction Manager | Dec 2018 – done | |
| | | Installation of 24 Reverse Osmosis membrane in Barema POM (4.4) | Improve and maintain water quality | Barema POM Manager | Dec 2019 – done | |
| | | OPIC trained smallholder growers and issue certificate. HOPL will only issue Glyphosate 360 in 5 liters containers to certified smallholders (4.6) | Trained and competent smallholder, higher yield | ESD Manager | Ongoing | |
| | | Develop proper management and monitoring plan for designated conservation areas within operation (5.2) | Biodiversity protection | ESD Manager | Jan 2018-Dec 2019 | |
| | | Conduct full inspection of all buffer zones on company lease areas report to management for appropriate action | Conservation of buffer zone | Environment officer | Due Dec 2019 (in progress) | |
| | | Set up a process similar to land acquisition for HCV set aside/buffer zones, where company and Landowner can enter into agreement to conserve HCV at the same time maintaining Landowner user right. | Conservation of buffer zone/HCVs | Lands Manager ESD Manager | Due Dec 2019 (in progress) | |

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|-----------------------|--|--|---|----------------------------|--|------------|
| | | Set up new landfill for Barema POM as per PNG Environment Code of Practice for Sanitary Landfill (5.3) | Improved compliance | Barema POM Manager | Due Dec 2019 (in progress) | |
| | | Construction triple interceptors for fuel storage at Area 7 (5.3) | Reduce pollution | Construction Manager | April 2019 (in progress) | |
| | | Repairing work on the boiler re-tubing work in Hargy POM (5.4) | Improve boiler efficiency and cut down diesel generator operation hour | Hargy POM Manager | Mar 2019 (in progress) | |
| | | Boiler re-tubing and Boiler automate control system (5.4) | Improve boiler efficiency and cut down diesel generator operation hour | Barema POM | May 2019 (in progress) | |
| | | Construction of EFB concrete pad at Navo POM where EFB is deposited (5.6) | Prevent leaching into environment | Navo POM Manager | Mar 2017-Dec 2019 (80% completed) | |
| | | Ponding system for effluent treatment at Barema POM after the Biogas plant (5.6) | Improve final quality of final discharge going out into the environment | Barema POM Manager | Mar 2019 (completed) | |
| | | Phase out wet cell battery and start using maintenance free battery (5.6) | Phase out sulphuric acid from work place to minimize environmental impact | Vehicle Workshop Warehouse | Due Dec 2019 (some stock of wet cell batteries yet to be utilized, date is deferred) | |
| | | Trial use of dust deposition gauge to measure particulate | Improved monitoring | Mill managers | Due Dec 2019 | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance |
|-----------------------|---|--|---------------------------|-----------------------------------|------------------------|------------|
| | | fallout around mill (5.6) | | | | |
| | | Upgrade sewage system for Pandi compound (6.5) | Improved sewage treatment | Construction Manager | May 2019 (in progress) | |
| | | Independent estates to be brought up to RSPO standards; chemical shed, OHS, workshop (8.1) | Improved compliance | Independent Estate Managers/OPI C | Due Dec 2020 | |
| | | <p>Apupul Woman: Is there fertilizer application upstream? Drainage system exist in Area 8?</p> | | | | |
| | <p>Associated Smallholder Requirement: Improvements suggested at the pre-planting inspection should be noted on the inspection form.</p> | <p>The smallholders are being educated on the good agricultural practice (harvesting, fertilizer, upkeep), environmental, social, health and safety through the Field Days conducted by HOPL and OPIC. It is conformed through interview that smallholders that they have attended Field Days. Sample of Field Day record: 29 January 2019. Location: Cenaka Division; Urumaili Sub-Division. Officer: Dessie Sapau. Attended by 22 smallholders (15 female, 7 male). Topic of Field day is Circle Weeding Demonstration. The some point to presented during field day is: Market place preparation, Net installation, Circle and Path weeding, Manual weeding, Chemical Weeding, Loose fruit collection, Advantages and Disadvantages between Manual and Chemical Weeding.</p> <p>27 March 2019. Location: Meramera Division; Malaso Sub-Division. Officer: Cleophas, Peter Mopa, Christopher and Temah. Attended by 25 smallholders (7 female, 18 male). Topic: BMP, Production, Fertilizer Application and Mama Loose Fruit (MLF). The field day training and demonstration are: Pruning, U-Box Stacking, Harvesting technique; Fertilizer application (partnership with OPRA Officer); The rest was same as above theme/topics.</p> | | | | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| | | 5 September 2019. Location: Tiauru LSS Block 010273. Attended by 34 LSS smallholders (13 female and 21 male). Facilitator: Smallholders Agricultural Assistant S (SHAAS) Team. Training Day topic: Crop Quality, Buffer Zones and Cover Crop. This forum is adequate to discuss and train the smallholders organized by the organization. | |
| 5.1.3 | 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 outcomes of monitoring and where there are operational changes that may have positive and/or negative environmental impacts. - Minor compliance - | Hargy Oil Palms Limited has prepared a monitoring format, as in "2019 Action Plan for Continual Improvement in Sustainable Performance_Status Update", with latest date of review 15 March 2019. The document is an updated of 2018 Hargy's Continual Improvement Plan. The document shows what has been actually done in 2018 against what was planned. | Yes |
| | Associated Smallholder Requirement: Environmental management improvements suggested by OPIC and/or Company Smallholder Departments during routine block inspections shall be implemented as practicable. | Associated smallholder received training from OPIC related to environmental management during field days | Yes |
| <p>Criterion 5.2</p> <p>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> | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|---|------------|
| 5.2.1 | <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 area within the HOPL is absence referred HCV assessment report conducted on 29 May - 3 June 2008. The HCV assessment report is referred to HCVF terminology by ProForest 2003. However, during field visit at Barema plantation area along the Barema Division 2 boundaries (South West), the buffer zone of Lobo river is covering by natural vegetation and well maintained of land covers. This area is fully protected and conserve by the plantation management.</p> <p>In relation to presence of primary forest as at 2005: The HCV report stated that some of the area proposed for Bakada/Mengen area is located on areas which have previously designated as Timber Right Purchase Areas. All of the proposed areas have been logged since 1980s with logging only having ceased recently. Much of the area has been logged up to three times. None of proposed areas for HOPL expansion program are located in areas of primary forest, or that was primary forest as at November 2005. Within the estate some areas are not planted and these habitats are being left in their natural state. None of these areas have been identified as HCVs. They are normally steep areas near river and in gullies. These areas have been maintained and are prospering as there are no incursions into any of these areas. Hargy Oil Palms stated these areas of around 2,200 Ha from three plantations as "conservation area". Identified RTE species:</p> <p>Animal: Blue eyed cockatoo (<i>Cacatua ophthalmica</i>), Eclectus parrot (<i>Eclectus roratus</i>), New Britain buzzard (<i>Henicopernis infuscatus</i>), Blyth's hornbill (<i>Aceros plicatus</i>).</p> <p>Plant: <i>Intsia bijuga</i> (Vu), <i>Guioa novobritannica</i> (Vu), <i>Mastixisdendron stoddardii</i> (Vu) HCV Study – Mengen, Bakada and Bialla, Oil Palm Expansion Program. The HCV study conducted by Douglas Environmental Services in February 2009. According this assessment that within Alangily, Gamupa and Alaba area, there is no HCV are presented.</p> <p>No changes of HCV assessment and HCV area within HOPL.</p> | Yes |
| 5.2.2 | <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill</p> | <p>There is no changes in conservation management plan that made by the certificate holder.</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|------------|
| <p>operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p> | <p>The HOPL has had HCV management plan and the action plan is still ongoing progress. The Recommendation from HCV Study as follow: The areas identified as HCVF which require rehabilitation should be planted with suitable tree species such as Eucalyptus deglupta and endangered species. Additional action: regular and dedicated monitoring program for buffer zone areas and HCV; Awareness on RTE will be regularly conducted to the workplace. By when: ongoing; Status: Ongoing. Conservation awareness programs to be developed and implemented for the local land owning communities of the proposed oil palms areas on the importance of totally protected species. Additional action: attend as many field days as possible to conduct awareness. By when: ongoing; Status: In progress. Sensitivity must prevail on areas near Mt. Ulawun. At least 200 meter buffer zone be declared for the proposed oi palm areas surrounding Mt. Ulawun volcano to minimise potential environmental and socio-economic impacts from the mud-flow. Additional action: regular and dedicated monitoring program for buffer zone areas and HCVs. By when: ongoing; Status: In place. Beneficial plants including flowering and fruiting trees such as Ficus spp. Are preferred for buffer zone and that would be seed bank for natural rehabilitation to encourage birds, bats and insect diversity. Additional action: in rehabilitation plans include Ficus and Eucalyptus in buffers. By when: ongoing; Status: In place. Develop specific conservation guidelines and policies for buffer zones and areas specific areas for conservation purposes. Additional action: regular and dedicated monitoring program for buffer zone areas and HCVs as part of EHS inspection. By when: ongoing; Status: In place. Use of fire should not be allowed anywhere near areas of HCV. Additional action: Ongoing awareness/training to new employees and contractors. By when: ongoing; Status: Ongoing. Maps of all buffer zones and HCV areas needed for conservation purposes are to be prepared and distributed to all estate managers and supervisors for easy identification of significant area. Additional action: Revise SOP and</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | <p>monitoring strategy for areas identified as conservation areas throughout the operations. By when: 31 Dec 2018; Status: In progress.</p> <p>Conservation of biological diversity should become a major responsibility of estate managers to be part of the overall management functions of all senior HOPL management. Additional action: Awareness programs to involve PM, DM as well as plantation employees, especially in management of conservation areas after mapping is completed. By when: 31 December 2018; Status: In progress</p> <p>In Pandi Estate: As reported in the Plantation EHS Monthly Inspection Checklist – Biodiversity Conservation period April 2019: there was sign of encroachment in Gamupa LLB area. Remedial action: Incident/Accident report form dated 24 April 2019; unknown person clear the buffer zone for making garen, although there were a signboard at site. Manager order to organize security guard to clear the gardening. Verification on 30 May 2019 and closed out.</p> | |
| 5.2.3 | <p>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.</p> <p>- Minor compliance -</p> | <p>To prevent any encroachment/trespassing in buffer zone, the plantation management made awareness to inform the settlers surrounding the plantation, which conducted on 27 April 2018. There are 54 settlers attended the awareness. All the attended people is settlers on state land.</p> <p>Kerakera (division 3) – Hargy Estate: Plantation EHS Monthly Inspection Checklist, September 2019. Date of inspection: 15 September 2019. Inspector: Kuburom Gobul (Division Manager) Within this inspection checklist, all aspect was inspected by the inspector including biodiversity conservation. According to the record, no RTE species was found.</p> <p>In Bakada Plantation – Pandi Estate: awareness session dated: 30 September 2019. Attendees: 15 participants.</p> <p>Kiba Plantation – Navo Estate; as part of EHS Monthly Inspection Checklist 2019. Dated 13 and 16 May 2019. Officer: David Waim (OHS/RSPO</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| | <p>Officer). RTE species observe: Kotkot (Crow) more than 30s at Field 7/8; White cockatoos at Field 10 (7 species), Field 14 (4 species); Back Kokomos/Hornbill at Field 12 (2 species), Field 14 (3 species), Field 8 (6 species); Kalangar at Field 10 (4 species). 15 August 2019. Officer: David Waim (OHS/RSPO Officer). Inspection for Biodiversity Conservation was not conducted due to volcanic eruption. 24 September 2019. Officer: David Waim (OHS/RSPO Officer). RTE Species observe: None.</p> <p>In Pandi Estate: the RTE Species Awareness, dated 22 March 2019 for 19 employees, sample Max Albert (upkeep), Baikas Yuande (harvesters) and James Lenny (wheelers).</p> | |
| <p>Associated Smallholder Requirement: OPIC and Company Smallholder departments to provide advice and support to associated Smallholders through field days and visits to Smallholder blocks as part of their routine extension activities.</p> | <p>During interview and site visit to 12 plots of smallholders area, it is conformed that the smallholders are aware of the impact of development of oil palm on surrounding natural areas through the OPIC planting approval process (control) as well as through RSPO awareness sessions. Smallholders understood the need to protect and if necessary reestablish buffer zones along watercourses and the potential use of these buffer zones as wildlife corridors. The smallholders are being educated on the RTE through the Field Days conducted by HOPL and OPIC. It is conformed through interview with smallholders that they have attended Field Days and they have understood about the protection of wild animals and hunting. At the OPIC office, the assessment team had observed the RTE poster posted on the notice board.</p> <p>Sample of Field Day record: VOP 29 Jan 2019. Location: Cenaka Division; Urumaili Sub-Division. Officer: Dessie Sapau. Attended by 22 smallholders (15 female, 7 male). Topic of Field day is Circle Weeding Demonstration. The some point to presented during field day is: Market place preparation, Net installation, Circle and Path weeding, Manual weeding, Chemical Weeding, Loose fruit collection, Advantages and Disadvantages between Manual and Chemical Weeding.</p> | <p>Yes</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | <p>27 March 2019. Location: Meramera Division; Malaso Sub-Division. Officer: Cleophas, Peter Mopa, Christopher and Temah. Attended by 25 smallholders (7 female, 18 male). Topic: BMP, Production, Fertilizer Application and Mama Loose Fruit (MLF). The field day training and demonstration are: Pruning, U-Box Stacking, Harvesting technique; Fertilizer application (partnership with OPRA Officer); The rest was same as above theme/topics.</p> <p>LSS 5 September 2019. Location: Tiauru LSS Block 010273. Attended by 34 LSS smallholders (13 female and 21 male). Facilitator: Smallholders Agricultural Assistant S (SHAAS) Team. Training Day topic: Crop Quality, Buffer Zones and Cover Crop.</p> | |
| 5.2.4 | <p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. <p>- Minor compliance -</p> | <p>Hargy Oil Palm Limited: The plan includes re-mapping conservation area throughout all company' plantation – for delineation of Hargy's conservation area, including area planned for development. Conservation area include the following HCV areas as identified in HCV assessment, buffers as prescribed by PNG regulations, other areas designated by HOPL management for conservation. Hargy Oil Palms Limited has prepared a system to improve the monitoring of RTE species. The monitoring RTE species is being done as part of Environmental, Health and Safety Inspection. The inspection performed by RSPO representatives on monthly basis at each plantation. The RTE monitoring done and look into the condition of buffer zone, presence of RTE species and identify any disturbance to the buffer zone. Hargy also prepare a plan to training more staff in cooperation with ProForest.</p> <p>The status of HCV and RTE species that are affected by plantation or mill operations is documented within HCV report (refer to 5.2.1). Monitoring of RTE's species and HCV area conducted in monthly basis through Inspection Checklist. Sample of inspection checklist as follow:</p> <p>Kerakera (division 3) – Hargy Estate:</p> | Yes |

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|-----------------------|--|------------|
| | <p>Plantation EHS Monthly Inspection Checklist, September 2019. Date of inspection: 15 September 2019. Inspector: Kuburom Gobul (Division Manager) Within this inspection checklist, all aspect was inspected by the inspector, including biodiversity conservation. According to the record, no RTE species was found.</p> <p>In Bakada Plantation – Pandi Estate: Plantation EHS Monthly Inspection Checklist, September 2019. Date of inspection: 30 September 2019. Inspector: Michael Silpaga. Species observe during monitoring: Hornbils. Located at Gamupa extension. Parrot; Located at Abulmosi. Coccoatoos; Located at Alaba.</p> <p>Plantation EHS Monthly Inspection Checklist, September 2019. Date of inspection: 30 August 2019. Inspector: Michael Silpaga Species observe during monitoring: Hornbils. 8 species. Located at Gamupa and Abulmosi. Parrot. 7 species. Located at gamupa extension and Alangily. Coccoatoos. 4 species. Located at Alaba.</p> <p>During field visit at buffer zone near Block 18D06 Gamupa, some signboard are available in buffer zone area. Also, auditor observed amount of Hornbil fly away near water pump at Sabalbala creek. The condition of conservation area are well managed.</p> <p>In Pandi Estate: Plantation EHS Monthly Inspection Checklist – Biodiversity Conservation period 10 February 2019: Check on buffer zone, sign of encroachment, local communities, large trees retained for bird nesting, consultation with communities for support in protecting buffer zones, RTE species identified: none sighted; sign of encroachment in Gamupa, status closed.</p> <p>Plantation EHS Monthly Inspection Checklist – Biodiversity Conservation period August 2019: Check on buffer zone, sign of encroachment, local communities, large trees retained for bird nesting, no palms being planted</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| | | adjacent to stream banks. RTE species identified: 7 Parrots sighted in Gamupa and Alangily; 8 Hornbills sighted in Gamupa, Abulmosi; 4 Cockatoos sighted in Alaba ; | |
| 5.2.5 | Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance - | There is no HCV area identified at local communities land. Smallholders: There is no HCV area identified at smallholder oil palm block. The smallholders are aware of the impact of development of oil palm on surrounding natural areas through the OPIC planting approval process (control) as well as through RSPO awareness sessions. During interview with representative of indigenous people surrounding the plantation company, buffer zone and HCV area is located in HOPL area. There is no HCV area identified set-asides located at customary land. | Yes |
| Criterion 5.3: | | | |
| Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner. | | | |
| 5.3.1 | All waste products and sources of pollution shall be identified and documented by Companies. - Major compliance - | Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-ESD-EMS-001-17, latest review 18 February 2019; identifying all aspects and impacts from plantation and mill operation. List/register of waste product documented in Waste Management Plan (PLN-ESD-EMS-001-08, Issue No: 8, Issued dated: 30 March 2018). Generation and management of wastes, within Hargy Oil Palms Limited project sites would be in accordance with the waste minimization and cleaner production principles as well as relevant PNG Industry Environmental Code of Practices, guidelines and other best environment practices & procedures applicable to the industry. | Yes |
| 5.3.2 | All chemicals and their containers shall be disposed of in accordance with the requirements of the applicable Safety Data Sheet. At a minimum, containers shall be triple rinsed with clean water and punctured to prevent re-use for liquid storage. Where triple rinsing is demonstrated to eliminate a risk to safety or the environment, re-use may be permitted | In Hargy Vehicle Workshop (VWS), Hargy Oil Palms Limited is cooperating with Organic Produce PNG Ltd for the waste engine oil disposal. Organic Produce PNG Ltd holds Environmental Permit No.EP-L2(548) dated 31 March 2017 – 27 April 2022; scope of permit to discharge waste into environment whilst carrying out an activity involving recycling waste material not limited to glass, oil, metals, paper, putrescible materials with capacity >100 tonnes/year. | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|------------|
| <p>for carrying pre-mix to the field, cutting down and using as waste bins and even using non-pesticide containers for non-potable water storage.</p> <p>- Major compliance -</p> | <p>Hargy Oil Palms Limited is cooperating with Niugini Plumbing & Hardware Supply Ltd., for collection of scrap battery to be sent for PacTrace Ltd for further recycling in Fiji (ETP Plant).</p> <p>Record sighted: Use Oil Disposal Record dated 14 March 2019 indicated 23,000 liters used oil (23 @1,000 liters container) and 2,665 liters (13 @205 liters drum) – total 25,662 liters. Use Oil Disposal Record dated 22 July 2019 indicated 6,000 liters used oil (6 @1,000 liters container) and 2,870 liters (14 @205 liters drum) – total 8,870 liters sent for recycling in Kimbe. Hargy’s Purchase Order to Organic Produce Ltd., No.CVWS041461 dated 16 August 2019 for delivery 9,000 liters waste oil. Wet and Dry Cell Battery Disposal Record dated 5 January 2019 indicated 6 pieces N200 battery, 40 pieces N150 battery, 19 pieces N120 battery, 25 pieces N70 battery, 5 pieces N50 battery, 3 pieces motorbike battery – total 98 pieces battery. Wet and Dry Cell Battery Disposal Record dated 22 July 2019 indicated 2 pieces N200 battery, 9 pieces N150 battery, 19 pieces N120 battery, 28 pieces N70 battery, 2 pieces N50 battery, 8 pieces motorbike battery – total 68 pieces battery.</p> <p>In Hargy Estate keeps the Record of Triple Rinsing of Pesticide Container, dated December 2018: indicated 1 x 20 liter Glyphosate, 1x20 liters Asolkum, 1x20 liters LI700 – kept for recycle.</p> <p>Navo POM keeps record of waste disposal: Navo Mill Hydrochloric Acid disposal: Period 10 March – 27 May 2019 disposed 56 @200 liters drum, remarks triple rinsing after charge out and re-used as rubbish bin. Navo Mill Laboratory Caustic Soda Bag: Period 10 March – 27 May 2019 disposed off 636 @25 kg bags, remarks after dosing bags are collected and put into rubbish for pit disposal.</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | <p>Navo Mill Laboratory Water Test Reagent Bottles: Period 1 June – 31 August 2019 disposed off 20 bottles @65 ml, remarks triple rinse and disposed.</p> <p>In Pandi Estate implement Waste Oil Count, indicating the issuance and disposal of used oil coming from preventive maintenance activities in Pandi Vehicle Workshop. Sample: On 27 April 2019, Pandi VWS sent out 10 drums with 2,000 literes waste oil to Navo VWS; On 6 July 2019, Pandi VWS sent out 8 containers with 8,000 liters used oil to Hargy VWS; On 5 September 2019, Pandi VWS sent out 4 containers with 4,000 liters used oil to Navo VWS.</p> <p>Waste Battery Count Sheet, recording the used battery disposal from sparepart replacement. Sample: On 6 July 2019, Pandi VWS sent out 4 pieces N70 battery, 4 pieces N120 battery, 2 pieces N150 battery, 2 motorbike battery to Navo VWS.</p> <p>Waste Filters Count Sheet, recording the used filters disposal from sparepart replacement. Sample: On 22 May 219, Pandi VWS sent out 60 filters to landfill in Sabalbala; On 6 July 2019, Pandi VWS sent out 121 used filters to Hargy VWS.</p> | |
| | <p>Associated Smallholder Requirement: Applies to associated Smallholders</p> | <p>For smallholder whose performing weed control/spraying themselves, have attended training and issued with certificate. They also understand the disposal method. The associated smallholder made triple rinse and broke the empty container before buried into landfill behind house.</p> | Yes |
| 5.3.3 | <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>- Minor compliance -</p> | <p>Hargy Oil Palms developed document Waste Managemet Plan PLN-ESD-EMS-001-09, dated 15 February 2019.</p> <p>Hargy Estate maintains landfill record: On 28 August 2019, vehicle L76 disposed off rubbish from mill into hydrocarbon pit; On 28 August 2019, vehicle LBO538 disposed off rubbish from Baubata into scrap metal pit; on 20 September 2019, vehicle L138 disposed off store pipia plastic in Area 7 into Domestic pit.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| | | In Pandi Estate, the rubbish/Waste Disposal Register: 14 January 2019 Pandi Estate disposed off 4 loads of domestic waste, 6 loads of garden waste, 1 loads of chemical/plastic waste, 1 load of scrap metal, 1 load of hydrocarbon waste – by Theo; 28 February 2019 Pandi Estate disposed off 6 loads of domestic waste, 10 loads of garden waste, 1 loads of chemical/plastic waste, 1 load of scrap metal, 1 load of hydrocarbon waste – by George; 24 June 2019 Pandi Estate disposed off 4 loads of domestic waste, 11 loads of garden waste, 1 loads of chemical/plastic waste, 1 load of scrap metal, 1 load of hydrocarbon waste – by Steven; 31 July 2019 Pandi Estate disposed off 9 loads of domestic waste, 11 loads of garden waste – all into Gamupa landfill. Note: for period June and August 2019, there was Mount Ulawun volcano eruption. | |
| | Associate Smallholder Requirement: Smallholders must demonstrate planned waste management and disposal by disposing of waste products in a designated waste pit. | For smallholder whose performing weed control/spraying themselves, have attended training and issued with certificate. They also understand the disposal method. The associated smallholder made triple rinse and broke the empty container before buried into landfill behind house. | Yes |
| Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised. | | | |
| 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 - | Hargy Oil Palms made Electrical Weekly Service Schedule as controls to minimise mileage and fuel usage by servicing the genset. In Hargy Estate, commencement dated 26 August 2019: Area 6 & 7, Area 8 & Kerakera, Makakiwa and Baubata, HMC and head office, Hargy Mill & RM duties, In Navo Estate, commencement dated 26 August 2019: Kiba Plantation, NMC & Ex, Sena/Vamukuma/Ibana, Pandi, Atata & Boundary In Hargy Estate, commencement dated 26 August 2019: Head office. | Yes |

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|-----------------------------------|--|------------------------|-----------------------------------|--------------------------|------------------------|---------------|---------------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--|-----|--------|--|-----|--------|--|-----|--------|--|-------|------|--|--|------|--|--|-----------------------------------|--------------------------|------------------------|-----------------------------------|--------------------------|------------------------|-----|----------|---------|--------|----------|---------|---------|-----|----------|---------|---------|----------|---------|--------|--|
| | | <p>In Hargy POM:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>2018 (liters)</th> <th>2019 (liters)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>56,500</td><td>55,300</td></tr> <tr><td>Feb</td><td>50,400</td><td>46,600</td></tr> <tr><td>Mar</td><td>56,000</td><td>55,200</td></tr> <tr><td>Apr</td><td>55,700</td><td>54,000</td></tr> <tr><td>May</td><td>56,300</td><td>57,038</td></tr> <tr><td>Jun</td><td>48,100</td><td>53,640</td></tr> <tr><td>Jul</td><td>49,900</td><td>51,200</td></tr> <tr><td>Aug</td><td>43,900</td><td>53,100</td></tr> <tr><td>Sep</td><td>31,150</td><td></td></tr> <tr><td>Oct</td><td>55,600</td><td></td></tr> <tr><td>Nov</td><td>53,100</td><td></td></tr> <tr><td>Dec</td><td>54,200</td><td></td></tr> </tbody> </table> <p>Capex 2020 for Hargy POM to have boiler 2 automation to maximize utilization thus reduce non-renewable energy.</p> <p>Hargy Estate records and summarized the volume of diesel fuel used for plantation activities: Integrated Stock and Works Requisition. Sample: On 1 September 2019, MH160 issued with 5 liters petrol from warehouse 25. On 3 September 2019, Kerakera Plantation issued 150 liters diesel fuel for genset 27. In month September 2019, Kerakera Plantation is consuming 6,027 liters of diesel fuel. In month September 2019, Hargy Estate is consuming 485 liters of petrol fuel.</p> <p>Use of Renewable energy and its Diesel Fuel saving in Barema POM:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="3">2018</th> <th colspan="3">2019</th> </tr> <tr> <th>Fiber + shell use for boiler (MT)</th> <th>Turbine generation (KWh)</th> <th>Diesel saving (liters)</th> <th>Fiber + shell use for boiler (MT)</th> <th>Turbine generation (KWh)</th> <th>Diesel saving (liters)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1,863.45</td> <td>260,300</td> <td>91,105</td> <td>2,454.62</td> <td>370,300</td> <td>129,605</td> </tr> <tr> <td>Feb</td> <td>2,108.93</td> <td>303,800</td> <td>106,330</td> <td>1,218.69</td> <td>167,300</td> <td>58,555</td> </tr> </tbody> </table> | | | | Month | 2018 (liters) | 2019 (liters) | Jan | 56,500 | 55,300 | Feb | 50,400 | 46,600 | Mar | 56,000 | 55,200 | Apr | 55,700 | 54,000 | May | 56,300 | 57,038 | Jun | 48,100 | 53,640 | Jul | 49,900 | 51,200 | Aug | 43,900 | 53,100 | Sep | 31,150 | | Oct | 55,600 | | Nov | 53,100 | | Dec | 54,200 | | Month | 2018 | | | 2019 | | | Fiber + shell use for boiler (MT) | Turbine generation (KWh) | Diesel saving (liters) | Fiber + shell use for boiler (MT) | Turbine generation (KWh) | Diesel saving (liters) | Jan | 1,863.45 | 260,300 | 91,105 | 2,454.62 | 370,300 | 129,605 | Feb | 2,108.93 | 303,800 | 106,330 | 1,218.69 | 167,300 | 58,555 | |
| Month | 2018 (liters) | 2019 (liters) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan | 56,500 | 55,300 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb | 50,400 | 46,600 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar | 56,000 | 55,200 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr | 55,700 | 54,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 56,300 | 57,038 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun | 48,100 | 53,640 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul | 49,900 | 51,200 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug | 43,900 | 53,100 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep | 31,150 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct | 55,600 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov | 53,100 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec | 54,200 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | 2018 | | | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Fiber + shell use for boiler (MT) | Turbine generation (KWh) | Diesel saving (liters) | Fiber + shell use for boiler (MT) | Turbine generation (KWh) | Diesel saving (liters) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan | 1,863.45 | 260,300 | 91,105 | 2,454.62 | 370,300 | 129,605 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb | 2,108.93 | 303,800 | 106,330 | 1,218.69 | 167,300 | 58,555 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 9 (Nov /2019)

| Criterion / Indicator | | Assessment Findings | | | | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---------------------|--|-----------|-----------|-----------|----------|-----------|------------|--|-------|---------------------|---------------------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|
| | | Mar | 2,998.99 | 668,700 | 234,045 | 2,270.74 | 225,048 | 78,767 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Apr | 2,948.16 | 514,300 | 180,005 | 2,544.87 | 187,744 | 65,710 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | May | 3,440.30 | 558,400 | 195,440 | 3,650.28 | 131,864 | 46,152 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Jun | 3,715.76 | 572,500 | 200,375 | 2,686.95 | 143,904 | 50,366 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Jul | 3,076.26 | 485,200 | 169,820 | 2,300.63 | 207,900 | 72,765 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Aug | 3,067.87 | 498,300 | 174,405 | 2,366.38 | 326,800 | 114,380 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Sep | 2,500.80 | 440,900 | 154,315 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Oct | 3,762.22 | 690,500 | 241,675 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Nov | 3,328.42 | 536,600 | 187,810 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Dec | 3,110.12 | 556,700 | 194,845 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | 35,921.00 | 6,068,200 | 2,130,170 | 19,493 | 1,760,860 | 616,301 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Diesel use <table border="1"> <thead> <tr> <th>Month</th> <th>2018 Diesel (liter)</th> <th>2019 Diesel (liter)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>56,900</td> <td>54,700</td> </tr> <tr> <td>Feb</td> <td>62,500</td> <td>52,300</td> </tr> <tr> <td>Mar</td> <td>49,500</td> <td>64,200</td> </tr> <tr> <td>Apr</td> <td>47,850</td> <td>54,500</td> </tr> <tr> <td>May</td> <td>44,050</td> <td>35,900</td> </tr> <tr> <td>Jun</td> <td>34,400</td> <td>43,100</td> </tr> <tr> <td>Jul</td> <td>46,700</td> <td>35,200</td> </tr> <tr> <td>Aug</td> <td>41,300</td> <td>40,900</td> </tr> </tbody> </table> | | | | | | | | Month | 2018 Diesel (liter) | 2019 Diesel (liter) | Jan | 56,900 | 54,700 | Feb | 62,500 | 52,300 | Mar | 49,500 | 64,200 | Apr | 47,850 | 54,500 | May | 44,050 | 35,900 | Jun | 34,400 | 43,100 | Jul | 46,700 | 35,200 | Aug | 41,300 | 40,900 |
| Month | 2018 Diesel (liter) | 2019 Diesel (liter) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan | 56,900 | 54,700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb | 62,500 | 52,300 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar | 49,500 | 64,200 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr | 47,850 | 54,500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 44,050 | 35,900 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun | 34,400 | 43,100 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul | 46,700 | 35,200 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug | 41,300 | 40,900 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|----------------|--|-----|--------|------------|-----|--------|--|-----|--------|--|-----|--------|--|--|---------|---------|-------|------|------|----------------|----------------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--------|-----|--------|--|-----|--------|--|-----|--------|--|--|---------|---------|-------|---------------|-----|--------|-----|--------|--|--|
| | | <table border="1"> <tr><td>Sep</td><td>38,100</td><td></td></tr> <tr><td>Oct</td><td>26,500</td><td></td></tr> <tr><td>Nov</td><td>37,000</td><td></td></tr> <tr><td>Dec</td><td>43,450</td><td></td></tr> <tr><td></td><td>528,250</td><td>380,800</td></tr> </table> <p>Capex 2020: Action plan to reduce fossil fuel use: EFB chipper/cutter and EFB press to extend boiler operation when mill stop – thus reduce diesel use.</p> <p>In Navo POM, the Diesel use:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th>2018</th> <th>2019</th> </tr> <tr> <th>Diesel (liter)</th> <th>Diesel (liter)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>36,174</td><td>36,983</td></tr> <tr><td>Feb</td><td>32,383</td><td>34,600</td></tr> <tr><td>Mar</td><td>26,250</td><td>39,786</td></tr> <tr><td>Apr</td><td>24,375</td><td>38,230</td></tr> <tr><td>May</td><td>28,960</td><td>38,172</td></tr> <tr><td>Jun</td><td>30,584</td><td>38,391</td></tr> <tr><td>Jul</td><td>29,827</td><td>35,078</td></tr> <tr><td>Aug</td><td>28,995</td><td>24,720</td></tr> <tr><td>Sep</td><td>34,058</td><td>28,090</td></tr> <tr><td>Oct</td><td>39,564</td><td></td></tr> <tr><td>Nov</td><td>35,425</td><td></td></tr> <tr><td>Dec</td><td>34,665</td><td></td></tr> <tr><td></td><td>381,260</td><td>314,050</td></tr> </tbody> </table> <p>Capex 2020 for Navo POM to have boiler 2 automation to maximize utilization thus reduce non-renewable energy.</p> <p>Fuel use in Pandi Estate:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>2019 (liters)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>39,380</td></tr> <tr><td>Feb</td><td>34,191</td></tr> </tbody> </table> | Sep | 38,100 | | Oct | 26,500 | | Nov | 37,000 | | Dec | 43,450 | | | 528,250 | 380,800 | Month | 2018 | 2019 | Diesel (liter) | Diesel (liter) | Jan | 36,174 | 36,983 | Feb | 32,383 | 34,600 | Mar | 26,250 | 39,786 | Apr | 24,375 | 38,230 | May | 28,960 | 38,172 | Jun | 30,584 | 38,391 | Jul | 29,827 | 35,078 | Aug | 28,995 | 24,720 | Sep | 34,058 | 28,090 | Oct | 39,564 | | Nov | 35,425 | | Dec | 34,665 | | | 381,260 | 314,050 | Month | 2019 (liters) | Jan | 39,380 | Feb | 34,191 | | |
| Sep | 38,100 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct | 26,500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov | 37,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec | 43,450 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 528,250 | 380,800 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | 2018 | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Diesel (liter) | Diesel (liter) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan | 36,174 | 36,983 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb | 32,383 | 34,600 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar | 26,250 | 39,786 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr | 24,375 | 38,230 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 28,960 | 38,172 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun | 30,584 | 38,391 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul | 29,827 | 35,078 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug | 28,995 | 24,720 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep | 34,058 | 28,090 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct | 39,564 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov | 35,425 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec | 34,665 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 381,260 | 314,050 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | 2019 (liters) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan | 39,380 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb | 34,191 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | |
|--|---|--|------------|--------|-----|--------|-----|--------|-----|--------|-----|--------|-----|--------|-----|--------|--|
| | | <table border="1"> <tr><td>Mar</td><td>43,078</td></tr> <tr><td>Apr</td><td>13,378</td></tr> <tr><td>May</td><td>44,710</td></tr> <tr><td>Jun</td><td>39,158</td></tr> <tr><td>Jul</td><td>42,521</td></tr> <tr><td>Aug</td><td>31,056</td></tr> <tr><td>Sep</td><td>20,726</td></tr> </table> | Mar | 43,078 | Apr | 13,378 | May | 44,710 | Jun | 39,158 | Jul | 42,521 | Aug | 31,056 | Sep | 20,726 | |
| Mar | 43,078 | | | | | | | | | | | | | | | | |
| Apr | 13,378 | | | | | | | | | | | | | | | | |
| May | 44,710 | | | | | | | | | | | | | | | | |
| Jun | 39,158 | | | | | | | | | | | | | | | | |
| Jul | 42,521 | | | | | | | | | | | | | | | | |
| Aug | 31,056 | | | | | | | | | | | | | | | | |
| Sep | 20,726 | | | | | | | | | | | | | | | | |
| Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice. | | | | | | | | | | | | | | | | | |
| 5.5.1 | There shall be no land preparation by burning - Major compliance - | Zero burning policy already stated within Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-ESD-EMS-001-17, latest review 18 February 2019 and Waste Management Plan (PLN-ESD-EMS-001-08, Issue No: 8, Issued dated: 30 March 2018). | Yes | | | | | | | | | | | | | | |
| 5.5.2 | Fire shall not be used for preparing land for replanting. - Major compliance - | During field observation at Hargy Estate (replanting), sighted there is no evidence that fire is used for land preparation. | Yes | | | | | | | | | | | | | | |
| | Associated Smallholder Requirement: 5.5.1 and 5.5.2 – Applies to associated Smallholder. | All smallholders have been informed during field day, and they all understood that no fire can be used for preparing land for replanting. | Yes | | | | | | | | | | | | | | |
| Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored. | | | | | | | | | | | | | | | | | |
| 5.6.1 | An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). | All the polluting activities and its impact has been identified within Hargy Oil Palms Ltd., Waste Management Plan (PLN-ESD-EMS-001-08, Issue No: 8, Issued dated: 30 March 2018). | Yes | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|---|------------|---|---|-----|---------|---------|-----|---------|--------|-----|---------|--------|-----|---------|---|-----|---------|--------|-----|---------|--------|-----|---------|--------|-----|---------|--------|-----|---------|--|-----|---------|--|-----|---------|--|-----|---------|--|--|-----------|---------|-----|
| | - Major compliance - | Additionally the Environmental Aspects Impacts Master Register No.REG-ESD-EMS-001-17, latest review 18 February 2019, identified the pollutant source from sewage and organic rubbish from the human settlement. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.6.2 | <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p>- Major compliance -</p> | <p>The parameter are Significant Aspect, Objective, Requirement, Resource, Timeframe, and Basis of Evaluation. Significant pollutants and GHG emissions from any sources is identify, including the plan to reducing it. For example: to reduce the GHG, Barema POM already has Methane Gas Capture from Mill effluent prior discharge to the plantation as Land Application.</p> <p>In Barema POM, biogas plant received 400 m³/hour, coming into buffer tank, into reactor tank to produce biogas.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>2018 Gas Production for Boiler (Nm³)</th> <th>2018 Gas Production for Boiler (Nm³)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>163,427</td><td>130,786</td></tr> <tr><td>Feb</td><td>114,147</td><td>61,676</td></tr> <tr><td>Mar</td><td>189,655</td><td>55,472</td></tr> <tr><td>Apr</td><td>181,257</td><td>-</td></tr> <tr><td>May</td><td>198,943</td><td>94,627</td></tr> <tr><td>Jun</td><td>242,412</td><td>38,521</td></tr> <tr><td>Jul</td><td>192,185</td><td>36,970</td></tr> <tr><td>Aug</td><td>218,335</td><td>81,552</td></tr> <tr><td>Sep</td><td>189,098</td><td></td></tr> <tr><td>Oct</td><td>221,996</td><td></td></tr> <tr><td>Nov</td><td>248,298</td><td></td></tr> <tr><td>Dec</td><td>192,205</td><td></td></tr> <tr><td></td><td>2,352,258</td><td>831,804</td></tr> </tbody> </table> <p>POM's effluent ponds in Barema POM: Cooling pond cap. 1,544 m³ Primary Anaerobic Pond No.1: cap. 5,772 m³; income flow rate 1,400 m³; Primary Anaerobic Pond No.2: cap. 64,735 m³; income flow rate 1,400 m³;</p> | Month | 2018 Gas Production for Boiler (Nm ³) | 2018 Gas Production for Boiler (Nm ³) | Jan | 163,427 | 130,786 | Feb | 114,147 | 61,676 | Mar | 189,655 | 55,472 | Apr | 181,257 | - | May | 198,943 | 94,627 | Jun | 242,412 | 38,521 | Jul | 192,185 | 36,970 | Aug | 218,335 | 81,552 | Sep | 189,098 | | Oct | 221,996 | | Nov | 248,298 | | Dec | 192,205 | | | 2,352,258 | 831,804 | Yes |
| Month | 2018 Gas Production for Boiler (Nm ³) | 2018 Gas Production for Boiler (Nm ³) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan | 163,427 | 130,786 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb | 114,147 | 61,676 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar | 189,655 | 55,472 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr | 181,257 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 198,943 | 94,627 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun | 242,412 | 38,521 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul | 192,185 | 36,970 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug | 218,335 | 81,552 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep | 189,098 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct | 221,996 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov | 248,298 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec | 192,205 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 2,352,258 | 831,804 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|--|------------|----------------------------|----------|-----------|----------|-----------|----------|-----------|----------|-----------|----------|-----------|----------|-----------|----------|----------|----------|----------|----------|----------|--|
| | | <p>Secondary Anaerobic Pond No.1: cap. 10,000 m³; income flow rate 1,400 m³;</p> <p>Secondary Anaerobic Pond No.2: cap. 10,000 m³;</p> <p>POME flowrate pumped to the land farrow for land application: November 2018 pumped 528.9 m³; December 2018 pumped 4,530 m³ – to the land; January 2019 pumped 7,425 m³; April 2019 pumped 5,202 m³; August 2019 pumped 74 m³;</p> <p>POM’s effluent ponds in Navo POM: Pond No.1 cap. 80 x 40 x 5m = 16,000 m³ ; Pond No.2 cap. 80 x 40 x 5m = 16,000 m³ ; Pond No.3 cap. 100 x 40 x 5m = 20,000 m³ ; Pond No.4 cap. 82 x 52 x 5m = 21,320 m³ ; POME flowrate pumped to the land farrow for land application:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Flowrate (m³)</th> </tr> </thead> <tbody> <tr><td>Jan 2019</td><td>22,375.39</td></tr> <tr><td>Feb 2019</td><td>13,339.56</td></tr> <tr><td>Mar 2019</td><td>20,204.98</td></tr> <tr><td>Apr 2019</td><td>20,822.18</td></tr> <tr><td>May 2019</td><td>21,499.30</td></tr> <tr><td>Jun 2019</td><td>13,547.00</td></tr> <tr><td>Jul 2019</td><td>4,021.00</td></tr> <tr><td>Aug 2019</td><td>3,029.00</td></tr> <tr><td>Sep 2019</td><td>9,698.00</td></tr> </tbody> </table> | Month | Flowrate (m ³) | Jan 2019 | 22,375.39 | Feb 2019 | 13,339.56 | Mar 2019 | 20,204.98 | Apr 2019 | 20,822.18 | May 2019 | 21,499.30 | Jun 2019 | 13,547.00 | Jul 2019 | 4,021.00 | Aug 2019 | 3,029.00 | Sep 2019 | 9,698.00 | |
| Month | Flowrate (m ³) | | | | | | | | | | | | | | | | | | | | | | |
| Jan 2019 | 22,375.39 | | | | | | | | | | | | | | | | | | | | | | |
| Feb 2019 | 13,339.56 | | | | | | | | | | | | | | | | | | | | | | |
| Mar 2019 | 20,204.98 | | | | | | | | | | | | | | | | | | | | | | |
| Apr 2019 | 20,822.18 | | | | | | | | | | | | | | | | | | | | | | |
| May 2019 | 21,499.30 | | | | | | | | | | | | | | | | | | | | | | |
| Jun 2019 | 13,547.00 | | | | | | | | | | | | | | | | | | | | | | |
| Jul 2019 | 4,021.00 | | | | | | | | | | | | | | | | | | | | | | |
| Aug 2019 | 3,029.00 | | | | | | | | | | | | | | | | | | | | | | |
| Sep 2019 | 9,698.00 | | | | | | | | | | | | | | | | | | | | | | |
| 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. Monitoring of mill smoke emissions must be in accordance with the requirements of the PNG Oil Palm Processing Industry Environmental Code of Practice. | Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the water quality at discharge points. Water samples taken every month, tested by mill environment officer in charge, and analysed to ensure compliance to Department of Environment and Conservation requirements at final discharge points. The water samples were sent to National Analysis Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limits. | Yes | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|---|------------|
| | - Minor compliance - | Monitoring of the GHG quantity is using RSPO PalmGHG Calculator Version 3.0.1, with the result Please refer to Annex (last page of this checklist). Monitoring of Palm GHG conducted in annual basis with period July – June. | |
| 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. | | | |
| 6.1.1 | A social impact assessment (SIA) including records of meetings shall be documented - Major compliance - | The most recent SIA report available at the time of the assessment is dated November 2013. The assessment was conducted by Rolland Allbrook Consulting. The assessment conducted was an update to the 2009 Social Impact Assessment conducted by Project Design & Management Pty Ltd. Interview was conducted with the consultant that has conducted the SIA assessment in 2013. HOPL operations consist of a settle project. Hence the community surrounding HOPL are mainly smallholders. Continuous engagement with the communities (e.g. field days) is part of the mechanism implemented by the Communities Affairs Department of HOPL to received social concerns. There is no changes of SIA assessment report. Social engagement and social community issues is responsibilities of Community Affairs Department. Based on interview with affected stakeholders during this surveillance assessment, the enter point to build communication with HOPL management related local communities and smallholders issues is Community Affairs Department. | Yes |
| 6.1.2 | There shall be evidence that the assessment has been done with the participation of affected parties. | As stated in content of the Updated of the 2009 SIA & Social Management Plan report, it was identified that the assessment has been conducted with participation of the affected parties. Interviewed with workers (who may | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|---|------------|
| | - Major compliance - | also be smallholders) had confirmed that HOPL is constantly collecting social inputs from the internal affected parties. Based on interview with affected stakeholders during this surveillance assessment, social impact assessment that conducted by HOPL in 2009 already involved affected parties. Such as: previous land owner, tribes/indigenous people, smallholders and surrounding villagers. Also, HOPL using field days event to gathering information from affected parties, particularly local communities. | |
| 6.1.3 | Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance - | The most updated management/improvement plan is dated July 2018. The impacts were identified based on the Updated of the 2009 SIA & Social Management Plan report dated November 2013 and additional inputs through stakeholders' engagement (e.g. Field Days at Nantabu in May 2018; at Barema Block #1333 in April 2018) The assessment team had reviewed the mitigation and actions plan. The monitoring of actions for those identified impacts made through the actions plan. The effectiveness of the mitigations is monitored and will be transferred to the annual continuous improvement plan if required. The management plan had identified the responsibility department and individuals for its implementation. Social Management/Improvement Plan Update June 2019: Primary Objective: Minimise risk and consequential adverse impacts of HOPL activities on the Health, Safety and Well-being of employees and communities. Establish the basis for keeping communities aware and informed of pending expansion activities and the potential for these activities to disrupt their daily activities. Establish an affective mechanism for the establishment of compensation in compliance with established government procedures, for loss of legal and customary rights. Ensure that mechanism are in place to prohibit child labour (subject to traditional family activities on VOP and LSS blocks) and that such child labour as practiced on these growing areas does not interfere with the child's educational opportunities. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | | <p>Document and explain mechanism for the fixing of farm gate prices, explanation and understanding of contractual arrangements entered into between the company and its out grower community.</p> <p>Establish and maintain a sustainable development donation policy as part of corporate social responsibility. This includes the policy towards allocation of Tax Credit Scheme monies and towards the employment of local people where these are of satisfactory qualifications and experience.</p> <p>Establish a risk management plan to identify current and future risks to the operation and to establish mitigation programme.</p> <p>Establish and maintain a management system for the welfare of workers and their families domiciled in the worker’s compound.</p> <p>Establish and maintain a management system for the resolution of land disputes both on smallholders blocks and within the VOP blocks.</p> <p>Ensure that ILG’s and other groups involved in the management of independent estates and LLB arrangements have the training in financial management to allow them to maximise their business opportunities.</p> <p>No use of paramilitary forces for the acquisition of land.</p> <p>No violation of Human Rights, forced labour and Human Trafficking.</p> <p>Establish a mechanism whereby struggling independent estates can transfer to a lease-lease back arrangement.</p> <p>Establish a social monitoring mechanism to establish the populations living on various types of units.</p> <p>Gender Equity and Social Inclusion.</p> <p>Set up WaSH programme and financial support for qualified smallholder blocks.</p> <p>Examine the current grievance system for efficacy and reach.</p> <p>This plan is documented and timetabled, including responsibilities for implementation.</p> | |
| 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 | <p>The plan is reviewed once a year for any updates required. The current review of the plan is dated July 2018. Additional social management plan identified including: Road Safety campaign at local school. Transferring of current independent estate to Lease Leased Back program to assist struggling those independent estates. Improvement of sanitation and</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| | current practices. In any case, the plans should be updated at least every ten years. There shall be evidence that the review includes the participation of affected parties. - Minor compliance - | provision of water tanks at housing compounds. Improvement plans that was carried out in 2017 includes improvement on the Grievance resolution including centralized management has been carried out. The plan has enable HOPL to closely monitor the resolution and its timeline. Social Management/Improvement Plan reviewed in yearly basis. The updated Social plan is June 2019. | |
| 6.1.5 | When updating plans, the entire supply base must be considered and particular attention shall be paid to the impacts of associated Smallholders. - Minor compliance - | Associated smallholders are continuously being engaged through Field Days. Example of management plan for 2018 which involved smallholders includes the transferring of independent estate as lease leased back approach to help those struggling independent estates. Within the social plans, certified smallholders blocks (VOP and LSS) as supply bases already considered and given particular attention. | Yes |
| 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 - | A list of the stakeholder was sighted. The stakeholders list includes the national government, provincial government, local government, oil palm growers, Incorporated Land Groups, landowners associations, non-governmental organization, industry, worker associations, contractors, other organizations, goods suppliers, srevice suppliers. The latest issuance of the list is on 29 July 2019. The company is committed on good communication internally and externally as stated in the The Communication Policy No.POL-HRD-GEN-002-05 date 7 June 2019; stated the Community Affairs GM is the personnel responsible in communicating any internal or external affairs relateing to this policy to relevant stakeholders. Communication procedure No.PRO-ESD-EMS-006-12 dated 11 February 2019 has documented the communication procedures on both internal and external interested parties related. It is also stated Community Affairs Department maintains awareness of stakeholders attitudes and identifying | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | any issues of potential concern. Ensuring that officers of the department travel to communities who are, or may reasonably be affected by company operation to ensure good two-way communication. | |
| 6.2.2 | A management official responsible for these issues shall be nominated. - Minor compliance - | The official responsible for communication is the Community Affairs Manager. Currently the position is held by Mr. Graham Coleman. Communication Procedure No. PRO-ESD-EMS-006-12 dated 11 February 2019 stated Community Affairs Department maintains awareness of stakeholders attitudes and identifying any issues of potential concern. Ensuring that officers of the department travel to communities who are, or may reasonably be affected by company operation to ensure good two-way communication. Mr. Grahame Coleman is the Community Affairs Manager, as a responsible person to manage communication with affected stakeholders. The affected parties has been interviewed and they are aware that in case of any communication is required with HOPL, they will go to Community Affairs department. | Yes |
| 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 - | List of Stakeholders Hargy Oil Palms Limited: National Government: 13 National Bodies Provincial Government: 6 Bodies Local Government: 5 Bodies Oil Palm Growers: 4 Growers scheme Local Communities and Wards: 24 organisations Incorporated Land Government (ILG's): 9 villages Land Owner Associations: 4 associations NGOs: 6 organisation Industry: 13 various industries Worker Association: 1 association (West New Britain Workers Union) Other Organisations: 5 Goods Suppliers: 35 suppliers. Stakeholders list are kept centralized in Community Affairs Department. Records of the communication between stakeholders or smallholders are available. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| | | <p>Records of communications sighted are in the form of meeting minutes, email communications, content of discussion with smallholders during field day.</p> <p>Samples of communication records: In Barema Mill communication with Barema Primary school was sighted. The school has requested community assistance for sport equipment on 9 March 2019. The Mill Manager had approved the request on 16 March 2019.</p> <p>During interview with the smallholders and the communities, it was confirmed that the communication between HOPL is effective.</p> | |
| <p>Criterion 6.3</p> <p>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p> | | | |
| 6.3.1 | <p>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.</p> <p>- Major compliance -</p> | <p>The new procedure of Grievance Mechanism (PRO-ESD-GEN-017-04, issued 22 February 2019). Section 12.1 Time schedule for grievance procedure process is 30 days (Day 29 Deadline for submission to CA Department about final response; Day 30 Closing of the grievance and briefing of response to complainants).</p> <p>In Navo POM, the Company's grievance policy have been disseminated on 10 February 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> | Yes |
| 6.3.2 | <p>Documentation of both the process by which a dispute was resolved and the outcome shall be available.</p> <p>- Major compliance -</p> | <p>The records of grievance at operation units are available. Samples reviewed in this assessment. Refer to Grievance Mechanism (PRO-ESD-GEN-017-04, issued 22 February 2019) Section 12.1 Time schedule for grievance procedure process is 30 days (Day 29 Deadline for submission to CA Department about final response; Day 30 Closing of the grievance and briefing of response to complainants).</p> | Yes |

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| | <p>In Pandi Estate, the Grievance Register 2019: On 6 February 2019, deformation of character to Agnes Veah by Division Manager and Supervisor. Remedial action The Division Manager and Supervisor is verbally warned on same date. Respective complainant accepts the remedial action and case closed.</p> <p>Pay Query Register 2019: January 2019 was 4 cases, all solved and signed off by the respective complainant;</p> <p>February 2019 recorded 4 cases, all solved and signed off by the respective complainant.</p> <p>March 2019 was 12 cases, 4 solved and signed off by respective employees. The other 8 grievance cases was resolved in April 2019.</p> <p>Sighted: Leo Toku 128 bags was not palms number and paid as per source document (paid, closed, signed off); Michael Saea 18 tons vs productivity 39.91 tons, outstanding 18 MT, output paid as per source document, no outstanding (paid, closed, signed off); Ikemi Alphonse 51.75 tons vs productivity 138.45 tons, outstanding 43.35 MT, output paid as per source document, no outstanding (paid, closed, signed off); Dickson Morea 7624 bunches vs productivity 9916 bunches, outstanding 2292 bunches, paid 7369 bunches, outstanding 255, but 255 was the palm number for pruning and paid (paid, closed, signed off);</p> <p>April 2019 was 1 case, solved and signed off by respective employees;</p> <p>Awareness on grievance mechanism flowchart, dated 17 September 2019, explaining: Every employee has the right to raise grievances or complaints, would write by filling in grievance/complaint form; has to be registered to compliance supervisor and sent to Evelyn Maya at community affairs to register. Attended by 25 workers (transport, field supervisor, payroll, etc.)</p> <p>In Hargy Estate, Kerakera division: Sample of complaint record, according to Complaints, Grievance & Disputes Register Form (FOR-ESD-GEN-013-03). Date received: 29 July 2019</p> | |

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| | <p>Complainant: Mr. Junior Honpii Position: FFB Wheeler Complaint concern: This person dismissed to work for 5 months and three weeks (11 February 2019 – 11 July 2019) and incident of HD3 signboard fallen due to drunk. Action taken: 3 August 2019 Decision: terminated from his work. All the complaint and grievance records are well-maintained onsite, the evidence able to demonstrate. Totally there are 2 complaints recorded since January up to August 2019.</p> <p>In Navo Estate: based on Grievances Record Book, since January – September 2019 there are 3 types of complaints recorded. The complaints related to: Date complaint received: 10 April 2019. Complainant: Mrs. Maria Joe, Mrs. Jovita Avata, Mrs. Regina Lobao and Mr. Alphonso Walter. Nature of complaint/grievance: received complaint from EFB Transport Female employees that Mr. James Torr has been sexually harassing them. Final response through counselling is on 6 May 2019.</p> <p>Oil Spill 27 March 2019. Complainant: Sexava Gang/Team. Concern: Unfavourable working conditions. The complaints related: No transport for Sexava team; Insufficient supply of detergent; No chemical shed for Sexava; Sunshine Milk and Canvas to be supplied; 8 hours to be paid during rainy season. 12 June 2019. Internal Memo issued by PM Kiba (Axel Hantson) to answer of Sexava Grievances and planned for the meeting with the team. Meeting with Sexava Team has been conducted on 13 June 2019 (attended by 9 workers, 1 Div. Mgr. PM Kiba) as a response to answer and resolved the problem.</p> <p>Navo POM received complaint letter from James Kuba, dated 14 March 2019. The complaint related to: -Oil spill from Navo POM’s effluent pond to Kianga River and Ibane River;</p> | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>-CPO spill from oil storage tank at Navo POM to Iko River and Ibana river, to the sea and washed ashore</p> <p>-Human waste disposal to Field 9 Kiba</p> <p>Management response:</p> <p>-Recorded in the Complaint, Grievance & Dispute Register Form, for each complaint.</p> <p>-Response letter by Navo POM Manager on 28 March 2019, stating: there was no oil spill from oiltank; however there was sludge overflow from sludge pit that was contained within the mill site drain. All was confirmed, nothing went pass the second storm water gate.</p> <p>-There was no breakout from final effluent pond; however there was storm water runoff from previous compost site that was directed out to palms as its mostly rain water.</p> <p>Meeting between Company CA (Basil Peutalo and Boniface Paolo) and complainant (James Kuba) dated 5 April 2019. Complainant rebuttal:</p> <p>-Disagree with company response, oil spill with yellow color and with thickness, the stuff was believed to be fresh palm oil. The stuff could be seen along most coast line from Sabali beach in the Ulamona vicinity. Other credible witness, Mr. Chris Lagisa from Saltamana Estate.</p> <p>-Disagree with company response. There was a breakout and contamination of Kianga creek. Evidence ws in some children swimming at this creek when the black stuff flowed downstream and covered them with black stuff.</p> <p>Follow up: On subsequent day, the company staff made courtesy visit and no further comment.</p> <p>Conclusion: Closed.</p> <p>On the 7 November 2016, both representatives of Ewasse Landowners Association and Hargy Oil Palms Limited signed a Mediated Agreement to end the long legal battle over allegations of environmental pollution to surrounding coastal areas and the sea.</p> <p>Under this Mediated Agreement, both parties have agreed to the following:</p> <ol style="list-style-type: none"> 1. Setup of plan to monitor and conserve foreshore and onshore reefs. | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>Between 2017 and 2018, HOPL engaged the services of an environmental NGO (Mahonia Na Dari) to carry out feasibility studies. This program could not continue further despite initial success mainly due to differences encountered within the appointment and removal of ELOA office bearers. So far this issue is yet to be resolved by the landowners;</p> <ol style="list-style-type: none"> 2. HOPL produced a draft MOU and delivered to ELOA representatives for their feedback in early 2017 on how to manage the LMMA plan; 3. Business Spinoff benefits. HOPL continues to give priority to ELOA through awarding of contract works to landowners based on their capability to undertake tasks required of them. It is the responsibility of ELOA to screen and recommend list of suitable contractors to HOPL to be engaged; 4. Employment of Ewasse landowners. HOPL continues to engage landowners in various employment capacities. The recruitment of landowners as full time employees is standard and given first preference over others, however they must meet basic educational qualifications in order to be considered for the job; 5. Scholarships. Scholarships are only granted to children of landowners who are eligible to enter tertiary and higher learning institutions in the field of engineering and agriculture streams. This is the responsibility of the ELOA executives to screen suitable candidates and submit names to HOPL for consideration. ELOA has not undertaken this activity since 2017; 6. Water Supply established at Ewasse Village HOPL built and installed water supply at its own cost to service Ewasse village in early 2018. ELOA was task to take responsibility in ensuring this service is maintained at all times. So far, members of the village community vandalised the water pumps which then resulted in the water supply becoming ineffective, however it is now the responsibility of ELOA to ensure water supply becomes functional once again; & 7. Complaints relating to relocation of effluent discharge has been dealt with by the Environment and Sustainability Department and so there | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | really is no issue of grave concern simply because HOPL continues to honour and comply with the terms of the Mediated Agreement. | |
| 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 who are rightful customary owners within the PNG legal system, shall be in place - Major compliance - | There was no revised on the procedure for identifying legal, customary or used rights. The manual titled Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development was established with flow charts have been prepared for awareness session among stakeholders/land owners concerning the process for establishing new blocks respectively in accordance with the lease-lease back and alienated land approaches. | Yes |
| 6.4.2 | A procedure for calculating and distributing fair payment (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, local community customary ownership of land and access to land for customary purposes. The procedure should recognise different mechanisms for agreement on the right to use the land ranging from outright purchase to leases and CLUAs of varying durations. Payments may include a land rental and royalty component based on production and the means of distribution must also be defined. | The terms and condition for the agriculture leased lease back approached was established since 1996 by palm oil industry in PNG involving the Palm Oil Producer Association. The royalties' percentage and PGK50 land rental for per hectare for production land was agreed by the industry. The land rental had increased over the years from PGK50 to PGK75 per Ha for production land and additional PGK20 per Ha is paid for buffer land. HOPL has developed the Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development that documented the Industry acceptance of the method to determine the leasing payment. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | - Minor compliance - | | |
| 6.4.3 | <p>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, with the agreement of the parties concerned, to the extent that damage to the interests of the affected parties will not result</p> <p>- Major compliance -</p> | <p>Negotiation evidences has been verified and as stated as per indicator 2.3.2 above.</p> <p>Samples of the execution on the payments as per the agreement were verified to be accordance to the MoUs signed between HOPL and land owners (ILGs, or incorporated companies).</p> | Yes |
| 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 | <p>Documentation of pay and conditions shall be available</p> <p>- Major compliance -</p> | <p>All workers (both casual and permanent) received their working contract. Payslips are provided to workers to show their earnings. The company is observing the country minimum wages. As according to the PNG Industrial Relations Act 1962, the minimum wage determined by the government can be reduced if a company provides workers free housing/electricity/water; medical assistance; schooling assistant; transport assistance and gardening land.</p> <p>In 14 March 2019, the HOPL issued for Annual Pay Increase 2019 and effectively on 5 April 2019. Based on Department of Labour and Industrial Relations, PNG. Authorised by GM HOPL on 14 March 2019. Increasing 3% wage in 2019 from PGK2.65 to PGK2.73 (in 2019).</p> <p>Minimum Wage Determination: POM = PGK350; Plantation = PGK280 (if the workers stay at compound). Just info from local expert.</p> <p>In Hargy POM; Sample of Mill workers verifying document as follow:</p> | Yes |

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|-------------------------------|---|------------|--------|--------------------|-------|-----------|------|-------|------------|----|------|--------|------------------|---|-------|-------------------------------|---|------|-------|--|--|--|----------------|----|------|-------|--|--|--|-------------------------------|-----|------|-------|--|--|--|--------------|--|--|--------|-----------------|--|-------|----------|--|--|--------|--|--|--|--------|-----|------|-------|-----------|------|-------|----------------|-----|------|--------|---------------|---|-------|------------|----|------|--------|--------------------|-----|-------|--|
| | <p>Employee ID: 04861. Name: S*****. Position: Boiler Attendant. Department: Hargy Oil Mill. Fort Code: 1919. Period Ended: 15 September 2019. Income as:</p> <ol style="list-style-type: none"> Normal Work: 88 hours (11 working days), rate: PGK2.73/hr. Total: PGK240.24. Overtime (1.5): 11 hrs, rate: 4.1 hr, total: PGK45.05. Overtime in public holiday (2.0): 7 hrs, rate: PGK5.46/hour, total: PGK38.22. Shift allowance worked 12: 1 hour, rate PGK30.03, total PGK30.03 Deduction: 0 <p>TOTAL Income: PGK353.54</p> <p>Employee ID: 01970. Name: K**** K*****. Position: Press Operator. Department: Hargy POM. Fort Code: 1919. Period Ended: 15 September 2019. Income as:</p> <table border="1" data-bbox="1115 866 1908 1136"> <thead> <tr> <th>Income</th> <th>Qty</th> <th>Rate</th> <th>Total</th> <th>Deduction</th> <th>Rate</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Normal Wrk</td> <td>80</td> <td>4.24</td> <td>339.20</td> <td>Employee Nasfund</td> <td>6</td> <td>22.39</td> </tr> <tr> <td>Sick leave (non work related)</td> <td>8</td> <td>4.24</td> <td>33.92</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Overtime (1.5)</td> <td>10</td> <td>6.36</td> <td>63.60</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Shift Allowance Worked 12 hrs</td> <td>1.0</td> <td>42.4</td> <td>42.40</td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="3">Total Income</td> <td>479.12</td> <td colspan="2">Total Deduction</td> <td>22.39</td> </tr> <tr> <td colspan="3">Nett Pay</td> <td>456.75</td> <td colspan="3"></td> </tr> </tbody> </table> <p>Employee ID: 00569. Name: W***** M*****. Position: Power House Operator. Department: Hargy POM. Fort Code: 1919. Period Ended: 15 September 2019. Income as:</p> <table border="1" data-bbox="1115 1254 1908 1359"> <thead> <tr> <th>Income</th> <th>Qty</th> <th>Rate</th> <th>Total</th> <th>Deduction</th> <th>Rate</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Adv. Pay Leave</td> <td>136</td> <td>6.49</td> <td>882.64</td> <td>Empy. Nasfund</td> <td>6</td> <td>87.23</td> </tr> <tr> <td>Normal Wrk</td> <td>88</td> <td>6.49</td> <td>571.12</td> <td>Nasfund House loan</td> <td>2.0</td> <td>29.08</td> </tr> </tbody> </table> | Income | Qty | Rate | Total | Deduction | Rate | Total | Normal Wrk | 80 | 4.24 | 339.20 | Employee Nasfund | 6 | 22.39 | Sick leave (non work related) | 8 | 4.24 | 33.92 | | | | Overtime (1.5) | 10 | 6.36 | 63.60 | | | | Shift Allowance Worked 12 hrs | 1.0 | 42.4 | 42.40 | | | | Total Income | | | 479.12 | Total Deduction | | 22.39 | Nett Pay | | | 456.75 | | | | Income | Qty | Rate | Total | Deduction | Rate | Total | Adv. Pay Leave | 136 | 6.49 | 882.64 | Empy. Nasfund | 6 | 87.23 | Normal Wrk | 88 | 6.49 | 571.12 | Nasfund House loan | 2.0 | 29.08 | |
| Income | Qty | Rate | Total | Deduction | Rate | Total | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Normal Wrk | 80 | 4.24 | 339.20 | Employee Nasfund | 6 | 22.39 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sick leave (non work related) | 8 | 4.24 | 33.92 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Overtime (1.5) | 10 | 6.36 | 63.60 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Shift Allowance Worked 12 hrs | 1.0 | 42.4 | 42.40 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Income | | | 479.12 | Total Deduction | | 22.39 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nett Pay | | | 456.75 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Income | Qty | Rate | Total | Deduction | Rate | Total | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Adv. Pay Leave | 136 | 6.49 | 882.64 | Empy. Nasfund | 6 | 87.23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Normal Wrk | 88 | 6.49 | 571.12 | Nasfund House loan | 2.0 | 29.08 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | Overtime (1.5) | 8.0 | 9.74 | 77.88 | Nasfund voluntary | 9.0 | 130.84 | |
| | | Overtime (2.0) | 24.0 | 12.98 | 311.52 | Income tax | | 154.36 | |
| | | Shift Allowance Worked 12 hrs | 1.0 | 71.39 | 71.39 | Nasfund saving & loan NCSL | | 150.0 | |
| | | | | | | WNBPO worker union | | 2.00 | |
| | | Total Income | | | 1,914.55 | Total Deduction | | 553.51 | |
| | | Nett Pay | | | 1,361.05 | | | | |
| | | --- | | | | | | | |
| 6.5.2 | <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p> | <p>The agreement binding HOPL and its general workers up to junior staffs are through the agreement made in Employment Details and Conditions form. Each form stipulated the basic agreement (i.e. wages rate and leave entitlement) and each form is linked to the terms and conditions of the HOPL Employee Manual. Sample of workers reviewed: W**** Y***** (Barema Mill) dated 16/07/2017 M**** T***** (Barema Mill) dated 25/07/2017 R***** L***** (Barema Mill) dated 14/07/2018 J***** R**** (Barema Mill) dated 20/02/2018 L***** J** (Barema Mill) dated 14/07/2018</p> <p>The employees contract have modification related to terms and conditions of the employees. Target to finalise the new template is on May 2020. During this surveillance assessment (2019), the new template of employee contract was 2,588 of employment contract (54.61%). Sample of Contract of Employment 1. Mr. H***** M*****, date of contract 5 September 2018. Position: FFB Grader. Location: Navo POM. Designation/start date: full time/7 January 2013. Working hours 88 ordinary hours per fortnight: 7x12 hours shifts per fortnight; 4 hours per week to cover change over. There are 22 items within the new contract template that have signed by employees, employer and the witness.</p> | | | | | | Yes | |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>2. Mr. M***** N***, date of contract 29 March 2019. Position: Operator (Powerhouse). Location: Barema POM. Designation/start date: full time/24 December 2018. Working hour: 88 hours.</p> <p>Kerakera Division-3: All payment for workers paid using bank transfer.</p> <p>Contract of Employment consist of: Position; Grade/Level; Remuneration (fortnightly basis); Designation/Start Date; Place of Recruitment; Working Hours; Working Schedule (7am-4.30pm, Fri 7am-2.30pm, Sat 7am-12pm); Overtime; Annual Leave (11 working days); Sick Leave (6 days/annum); Superannuation (6% employee, 8.4% employer) in accordance with PNG Superannuation Act; Probation Period (6 months); Medical Clearance; Maternity Leave (12 weeks and full pay after 12 months working) – refer to employee handbook for other conditions of maternity leave; Housing; Medical Treatment: worker and declared dependants receive medical treatment at no cost to the limit of the services available at HOPL clinics; Salary Review; Company Policy&RSPO; Transfer; Confidentiality of Information; Termination of this Agreement; Conclusion. Signed by HROps Manager, Division Manager, Employee, Witness.</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>In addition, there is Staff Employment Form which contains Employment Details, Name, Address, Date of Birth, Department, Position, Location, Salary Rate, Date of Commencement, Point of Recruitment, Employment Status, Annual Leave Entitlements, Personal Details.</p> <p>Other supporting documents available is Employee Induction Checklist, General Disciplinary Rules, Pre Employment Medical Check Form, Salary or Wages Declaration (Form S3) issued from PNG Internal Revenue Commission.</p> <p>National Superannuation Fund Limited (Section 94 (1) Superannuation (General Provisions) Act 2000.</p> | |
| 6.5.3 | <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities. These shall be to national standards where such standards exist and where no such public facilities are available or accessible.</p> <p>- Minor compliance -</p> | <p>HOPL provides housing to all level of staff (including field workers). During the field assessment (e.g. Barema Plantations), it was observed that the housing conditions provided by HOPL to the workers are in good condition. The housing facilities comes with electricity, clean tap water, toilet, cooking facilities and small area for the workers to do crop gardening. As per the employee handbook, workers are not required to pay for electricity and water. The assessment team had verified such condition during the workers' interview and verified payslips that there are no deductions. It was observed that monthly housing condition reports is in place (e.g. in Barema Plantation). All employees of HOPL and their dependent have accessed to medication. During the interview with the Nursing Office at Barema Plantations, it was confirmed that the dependent of an employee of HOPL is given free medication. There are 10 clinics within the entire HOPL operating units. Records of the patient are available and kept by both the clinic and workers. National Primary and Secondary schools are available within the HOPL operating units. The children of the workers and smallholders attends these national schools. At the housing compound (e.g. Barema Plantations), there are basic set aside land for workers' sports activities and religious (e.g. Church) are available. The company also provides vehicle to transfer workers from estate to the Bialla town grocery shopping.</p> <p>A 5 years housing expansion and replacement plan. The plan covers the Makakiwa area (2019); Urumailu & Kerakera area (2020); Kiba area</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
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| | <p>(2021); Atata/Remailing area (2022); Ibane/Sena area (2023). The total estimated cost is approximately USD22million. Due to cultural constraints, HOPL had further planning to reduce additional workforce by encouraging the wife for their male workers to work with the company.</p> <p>Kerakera division compound GL House: 64; JS House: 4; SQ: 3; Executive House: 1; Total: 72 houses. Census of population: Employees (139), Dependents (242), Total: 381.</p> <p>During field observation at Kerakera compound, the facilities for the workers are housing (1 house for 2 families), sport/soccer court, food crops field, water tank, clinic. For educational, the company only provide the transportation to deliver the children goes to national school surrounding the plantation area.</p> <p>Sabalbala Compound – Pandi Estate: 1 football court, 1 rugby court, 1 volleyball court, 2 canteen, 1 meeting hall, gardening field. Based on field observation at Sabalbala Compound, the company provide housing, sports court, church, meeting hall, water, canteen (cooperate with local community). Total housing in Sabalbala compound: 97 unit of GL house; 11 unit of Junior Staff House.</p> <p>Check water supply at house GL 61 is working and the water is clean. The company provides canteen as part of opportunities to the local community. The canteen management is by rental system to the local communities.</p> <p>Kiba compound – Navo Estate: 202 GL house, 9 Junior Staff house, 1 clinic, 1 canteen, 1 sport court, 1 southern cross water treatment. Partnership of canteen management at Kiba compound is with PAU trading (local community from Ulamona village). Gardening/food crops field provided at compound area.</p> | |

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| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|--------------------|---------------------|-------------------------|---------------------|-------------------------|------------------|--------------------|--------------------|--------------------|--------------------|-----------------|--------------------|--------------------|--------------------|--------------------|------------------|----------|----------|---------|----------|---------|--------------------|--------------------|--------------------|--------------------|--------------|----------|----------|----------|----------|-----------|----------|----------|----------|----------|--|
| | <p>Field visit at Barema Mill Care Centre, regarding evacuated workers of Navo Mill workers and Barema Plantation Care Centre (refugee of Navo Estate workers), it was observe that people provide staple food (rice) 1 kg/family or 300gram/person, clean water, tents and dome (1 dome/family), temporary toilet (separated male-female). Total evacuated workers from Navo Mil is 143 workers (645 people). Total evacuated workers from Navo Estate is 3,404 people (including its family). Based on interview with 2 Navo Mill workers and 2 persons Atata Plantation workers, during they stay at care centre (since 30 Sept 2019), every day the workers must be attend to muster morning to ensure the work attend and calculated as working day with normal working hour (8 hrs/day). During interview with evacuated workers, they feel thankful to the company to provides food, water supply, toilet during evacuated. Evacuated workers interviewed, as follow: Navo Mill: Mr. John Geregl (Navo POM water pump operator). Mr. Paul Divu (Navo POM process supervisor). Navo Estate (Atata Plantation): Mr. Vincent Boma (Harverting Overseer). Mr. Piwai Mongu (Admin Driver).</p> <p>Water quality test for worker housing, May 2019</p> <table border="1" data-bbox="1115 1098 1910 1393"> <thead> <tr> <th>Parameter</th> <th>Navo Mill Compound</th> <th>Navo-Kiba Compound</th> <th>Hargy Mill Compound</th> <th>Hargy-Urumaili Compound</th> </tr> </thead> <tbody> <tr> <td>Faecal Coliforms</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> </tr> <tr> <td>Total Coliforms</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> </tr> <tr> <td>Colour, Apparent</td> <td><5 hazen</td> <td><5 hazen</td> <td>5 hazen</td> <td><5 hazen</td> </tr> <tr> <td>E. Coli</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> <td>0 colonies /100 ml</td> </tr> <tr> <td>Total Solids</td> <td>140 mg/L</td> <td>120 mg/L</td> <td>170 mg/L</td> <td>180 mg/L</td> </tr> <tr> <td>Turbidity</td> <td>0.27 NTU</td> <td>0.30 NTU</td> <td>0.36 NTU</td> <td>0.21 NTU</td> </tr> </tbody> </table> | Parameter | Navo Mill Compound | Navo-Kiba Compound | Hargy Mill Compound | Hargy-Urumaili Compound | Faecal Coliforms | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | Total Coliforms | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | Colour, Apparent | <5 hazen | <5 hazen | 5 hazen | <5 hazen | E. Coli | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | Total Solids | 140 mg/L | 120 mg/L | 170 mg/L | 180 mg/L | Turbidity | 0.27 NTU | 0.30 NTU | 0.36 NTU | 0.21 NTU | |
| Parameter | Navo Mill Compound | Navo-Kiba Compound | Hargy Mill Compound | Hargy-Urumaili Compound | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Faecal Coliforms | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Coliforms | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Colour, Apparent | <5 hazen | <5 hazen | 5 hazen | <5 hazen | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| E. Coli | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | 0 colonies /100 ml | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Solids | 140 mg/L | 120 mg/L | 170 mg/L | 180 mg/L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|---|------------|
| 6.5.4 | <p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p> | <p>Trade stores are available at operating units compound to ensure food are available. Land are also provided at the housing camps to allow workers for crops gardening. In order to ensure the price are being controlled, in the Trade Store Lead Agreement, it is stated that the cost of items sold must not exceed normal price of good sold in Bialla town with a markup not exceeding 30%. Contract reviewed: Ngepieng Trading dated 23 August 2016 for Navo Mill Compound Sena Oil Palm Estate dated 11 April 2018 for Ibane Compound.</p> <p>The basket survey was conducted on monthly basis to monitor the price of the food sold in market owns by locals. The basket survey shows no significant increase in food prices for the past 3 months. For Bakada Plantations, due to the remoteness, transport was provided by HOPL to transfer workers on pay weekend to Navo for grocery shopping.</p> <p>The company provides canteen in each compound as part of business of opportunities to the local community. The canteen management is by rental system to the local communities with the agreement.</p> <p>In example at Kiba compound – Navo Estate. Partnership of canteen management at Kiba compound is with PAU trading (local community from Ulamona village). Trade Store Lease Agreement HOPL and PAU Trading, dated 1 March 2019. The lease fee is PGK500/month and lease period is monthly basis.</p> <p>Gardening/food crops field provided at compound area.</p> | Yes |
| <p>Criterion 6.6</p> <p>The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| 6.6.1 | A published statement in English and Tok Pisin languages recognising freedom of association shall be available. - Major compliance - | Freedom of Association Policy No.POL-HRD-GEN-009-04, issued on 7 June 2019, issue No. 4. Bilingual: English and Tok Pisin language. This policy was available on Division notice board and auditor was noted that the policy is bilingual (English and Tok Pisin). In Barema POM, on 24 July 2019, Barema POM made awareness on Freedom of Association policy for 9 mill workers, comprise electrician. On 22 August 2019, Barema POM made awareness on Freedom of Association policy for 18 mill workers, comprise of boiler operator, clarification, ramp operator, clarification, sterilizer attendant, press attendant, etc. | Yes |
| 6.6.2 | Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance - | Meeting Minute, dated 20 December 2018. Location: HR Conference Room. Time: 10.00 – 10.30AM. Attendees: Steven Pa’ak (HR Operation Manager) John Jeffrey (Mill Process – Representative of Union at Hargy Mill) Francis Tapai (RO) Daniel Kanau (General Secretary of West New Britain Palm Oil Union) Darren Stott (HR Manager HOPL). Topic to discuss was sighted. | Yes |
| 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 - | Policy on Child Labour No.POL-HRD-GEN-007-06, issued on 7 June 2019, issue No.6. Awareness In Hargy Estate: Division-1: 12 August 2019. Location: Field (02B06). Attended by 15 harvesters, 13 loose fruit collectors. Based on employees data list: The youngest worker was 19 year, 10 month (Mr. David Napilua – FFB Grader). Date of birth: 19 November 1999, join date: 27 May 2019. Based on field observation and interview with sampled workers, child labour was absent. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| | | <p>In Barema POM: On 25 September 2019, Barema POM made awareness on No Child Labour policy for 9 mill workers, comprise of electrician. On 18 September 2019, Barema POM made awareness on No Child Labour policy for 9 laboratory department.</p> <p>In Navo POM: Explanation on No Child Labour policy, dated 24 February 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> <p>In Pandi Estate: awareness on child labour policy, dated 17 September 2019, explaining: Children under the age of 18 years old should not be working in any core operations of the company. No children should help their parents during the term breaks or Christmas Holiday. Attended by 25 workers (transport, field supervisor, payroll, etc.)</p> | |
| <p>Criterion 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p> | | | |
| 6.8.1 | <p>A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.</p> <p>- Major compliance --</p> | <p>Equal Employment Opportunity Policy No.POL-HRD-GEN-008-06, issued on 7 June 2019, issue No.6. All the new policy which issued on June 2019 was put on the division notice board in each estate/plantation/mill office and sites.</p> <p>Based on field observation at Navo Estate, auditor found 4 EFB tractor driver is female workers. This is the evidence that company implementing equal opportunities to the workers.</p> | Yes |
| 6.8.2 | <p>Evidence shall be provided that employees and groups including local communities, women, and workers from other provinces have not been discriminated against.</p> <p>- Major compliance -</p> | <p>Interview with local communities confirmed that the local Nationals are employed in HOPL and are given opportunities to be supervisor and headman based on their qualification and work performance. No gender bias identified when interview with the female workers.</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|------------|-------------------------|------------|--------|-------|-------|--------|-------|-------|-------|-------|--------|----------|--------|---|----------|--------|---|--|----|------|-------|----|------|---------|----|------|-----------------|-----|------|--------|-----|------|------------|----|------|-------------------------|-------|-------|--------|-----|-------|------------|-----|-------|-------------|----|------|----------------|-----|------|-----|----|------|------|----|------|------------|----|------|------|----|------|-------------------------|-----|-------|------|----|------|---------|----|------|--------|----|------|------------------|----|------|--------|-----|------|--|--|--|-------------|-------|-------|-------------|-------|-------|-------------|--|--|--|-------|--------|--|
| | <p>Based on Manpower database from HR Department, provides that employees working at HOPL be not discriminated. Manpower database upto September 2019 shows as follow:</p> <table border="1" data-bbox="1115 518 1585 641"> <thead> <tr> <th>Gender</th> <th>Amount</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>3,593</td> <td>75.42</td> </tr> <tr> <td>Female</td> <td>1,171</td> <td>24.58</td> </tr> <tr> <td>TOTAL</td> <td>4,764</td> <td>100.00</td> </tr> </tbody> </table> <p>Workers origin basis</p> <table border="1" data-bbox="1115 699 1883 1264"> <thead> <tr> <th>Province</th> <th>Number</th> <th>%</th> <th>Province</th> <th>Number</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Autonomus Region Of Bouganville (AROB)</td> <td>55</td> <td>1.16</td> <td>Manus</td> <td>23</td> <td>0.49</td> </tr> <tr> <td>Central</td> <td>31</td> <td>0.65</td> <td>South Highlands</td> <td>282</td> <td>5.95</td> </tr> <tr> <td>Chimbu</td> <td>127</td> <td>2.68</td> <td>Miline Bay</td> <td>30</td> <td>0.63</td> </tr> <tr> <td>East New Britain (ENBP)</td> <td>1,190</td> <td>25.11</td> <td>Morobe</td> <td>655</td> <td>13.82</td> </tr> <tr> <td>East Sepik</td> <td>575</td> <td>12.13</td> <td>New Ireland</td> <td>31</td> <td>0.65</td> </tr> <tr> <td>East Highlands</td> <td>445</td> <td>9.39</td> <td>Oro</td> <td>23</td> <td>0.49</td> </tr> <tr> <td>Enga</td> <td>49</td> <td>1.03</td> <td>West Sepik</td> <td>69</td> <td>1.46</td> </tr> <tr> <td>Gulf</td> <td>50</td> <td>1.06</td> <td>West New Britain (WNBP)</td> <td>728</td> <td>15.36</td> </tr> <tr> <td>Hela</td> <td>72</td> <td>1.52</td> <td>Western</td> <td>16</td> <td>0.34</td> </tr> <tr> <td>Jiwaka</td> <td>58</td> <td>1.22</td> <td>Western Highland</td> <td>34</td> <td>0.72</td> </tr> <tr> <td>Madang</td> <td>196</td> <td>4.14</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Sub-Total A</td> <td>2,848</td> <td>60.09</td> <td>Sub-Total B</td> <td>1,891</td> <td>39.91</td> </tr> <tr> <td>GRAND TOTAL</td> <td></td> <td></td> <td></td> <td>4,739</td> <td>100.00</td> </tr> </tbody> </table> <p>In Pandi Estat, awareness on equal opportunity policy, dated 13 June 2019, explaining: There should not be any discrimination in its operation. Employment can be given to both male and female of even physically</p> | Gender | Amount | Percentage | Male | 3,593 | 75.42 | Female | 1,171 | 24.58 | TOTAL | 4,764 | 100.00 | Province | Number | % | Province | Number | % | Autonomus Region Of Bouganville (AROB) | 55 | 1.16 | Manus | 23 | 0.49 | Central | 31 | 0.65 | South Highlands | 282 | 5.95 | Chimbu | 127 | 2.68 | Miline Bay | 30 | 0.63 | East New Britain (ENBP) | 1,190 | 25.11 | Morobe | 655 | 13.82 | East Sepik | 575 | 12.13 | New Ireland | 31 | 0.65 | East Highlands | 445 | 9.39 | Oro | 23 | 0.49 | Enga | 49 | 1.03 | West Sepik | 69 | 1.46 | Gulf | 50 | 1.06 | West New Britain (WNBP) | 728 | 15.36 | Hela | 72 | 1.52 | Western | 16 | 0.34 | Jiwaka | 58 | 1.22 | Western Highland | 34 | 0.72 | Madang | 196 | 4.14 | | | | Sub-Total A | 2,848 | 60.09 | Sub-Total B | 1,891 | 39.91 | GRAND TOTAL | | | | 4,739 | 100.00 | |
| Gender | Amount | Percentage | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Male | 3,593 | 75.42 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Female | 1,171 | 24.58 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TOTAL | 4,764 | 100.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Province | Number | % | Province | Number | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Autonomus Region Of Bouganville (AROB) | 55 | 1.16 | Manus | 23 | 0.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Central | 31 | 0.65 | South Highlands | 282 | 5.95 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Chimbu | 127 | 2.68 | Miline Bay | 30 | 0.63 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| East New Britain (ENBP) | 1,190 | 25.11 | Morobe | 655 | 13.82 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| East Sepik | 575 | 12.13 | New Ireland | 31 | 0.65 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| East Highlands | 445 | 9.39 | Oro | 23 | 0.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Enga | 49 | 1.03 | West Sepik | 69 | 1.46 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gulf | 50 | 1.06 | West New Britain (WNBP) | 728 | 15.36 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hela | 72 | 1.52 | Western | 16 | 0.34 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jiwaka | 58 | 1.22 | Western Highland | 34 | 0.72 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Madang | 196 | 4.14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sub-Total A | 2,848 | 60.09 | Sub-Total B | 1,891 | 39.91 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRAND TOTAL | | | | 4,739 | 100.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | disable people. Moreover, company does not favour racism or wantok system. The awareness session was attended by 65 workers, comprise of: harvesters, wheelers, loose fruit collectors, sprayers, drivers, carpenters, fertilizer applicators, housewives. | |
| 6.8.3 | <p>It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p> | <p>The latest review on the Equal Employment Policy was on 16 December 2015. The General Manager had acknowledge on 10 July 2017 that there is no review required to the policy. Employment records are able to demonstrate that workers are employed or promoted base on capabilities and skills – Tanine has been promoted to from weighbridge clerk to supervisor base on recommendation by the mill manager. Employment files reviewed did not show any discrimination of medical fitness for employment.</p> <p>Sample of promotion are based on skills, capabilities and qualities.</p> <p>Mr. P*** Divu (Process Supervisor at Navo POM). Performance Appraisal Reporting Year 2018. Performance area consist of Works Safety, Initiative, Technical Skills, Productivity, Work Quality, Working Relations (Peers/Supervisor), Team Work, Attitude, Punctuality, Attendance. Average score is B. Promotion: from Grade/Level (7/6), proposed to Grade/Leve (8/1).</p> <p>Mrs. R***** Misiliu (Weighbridge Clerk) Information of Probation End and Designated as Permanent Workers. Date, 3 Dec 2018. Probation period was ended on 15th Feb 2017, she recorvised as permanent employee staring 3 December 2018.</p> <p>Sample of promotion employees based on Staff Order – General. Name: J***** Batimius (80134) Current position: General Labour New Position: Genset attendant – Atata Current Grade: Grade 01, Level 1 New Grade: Grade 03, Level 1 Current Hourly Rate: PGK2.65</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|---|------------|
| | | <p>New Hourly Rate: PGK3.73 Effective date: 2 September 2019.</p> <p>Name: W***** Paul (16824) Current position: FFB Wheeler New Position: Harvest Overseer – Hargy Div. 1 Current Grade: Grade 01, Level 1 New Grade: Grade 03, Level 1 Current Hourly Rate: PGK2.73 New Hourly Rate: PGK3.84 Effective date: 2 September 2019.</p> <p>Name: M**** Alu (03919) Current position: Trade Assistant - Welder New Department: Genset attendant – Atata Current Grade: Grade 01, Level 1 New Grade: Grade 02, Level 3 Current Hourly Rate: PGK2.65 New Hourly Rate: PGK3.40 Effective date: 29 January 2019.</p> | |
| <p>Criterion 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.</p> | | | |
| 6.9.1 | <p>A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p> | <p>Updated policy: Sexual Harassment Policy No.POL-HRD-GEN-011-06, issued on 7 June 2019, issue No.6; Family Violence Policy No.POL-HRD-GEN-016-01, issued on 7 June 2019, issue No.1; Policy on Child Labour No.POL-HRD-GEN-007-06, issued on 7 June 2019, issue No.6; Freedom of Association Policy No.POL-HRD-GEN-009-04, issued on 7 June 2019, issue No.4. Bilingual: English and Tok Pisin language.</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | <p>Equal Employment Opportunity Policy No.POL-HRD-GEN-008-06, issued on 7 June 2019, issue No.6;</p> <p>The policies have been communicated to all employee at the time of the employment (during induction). The policy is publically published on notice boards at all operating units of the company. By means of interview, the assessment team confirms that female workers are aware on policies and the meaning of sexual harassment and violence. The interviewed workers are able to inform the assessment team on the channel to raise any grievances to HOPL.</p> <p>Based on interviews with the Senior Welfare Officer, the communication method used to disseminate policies on the prevention of sexual harassment and family violence through the installation of policies on notice boards, presentations in housing (though not routinely) and induction upon hiring new employees.</p> <p>To ensure there is no violence in workers' housing, the Welfare Division has weekly monitoring based on reports that come to them. Sample of weekly report sighted:</p> <p>Week 36 (2-7 September 2019). Recorded 3 cases of domestic violence. Week 37 (9-14 September 2019). Recorded 2 cases of domestic violence. Week 39 (23-28 September 2019). Recorded 1 case of domestic violence, 2 cases of family relationship.</p> <p>In Hargy Estate, Kerakera Division;Awareness/Socialisation to the workers: 7 August 2019, located in Division-2. Attended by 14 workers.</p> <p>In Pandi Estate, Kiba compound: Family and Sexual Violence Awareness, dated 11 September 2019. This awareness conducted by Welfare Officer.</p> <p>The regular Gender Committee meetings are held on a quarterly basis. The last meeting was held on 27 September 2019 which was attended by Mrs. Claire August (Welfare Officer) Mr. Edward Philip (Senior Welfare Officer) Mr. Darren Stott (GM HR Department)</p> | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | <p>Mrs. Lina Kadada (Emergency Response Nurse Officer) Mrs. Margaret Voklus (Internal Audit Manager) In the meeting discussed about Whistle Blower Policy, ToR Review, Gender Committee Evaluation, Sexual Harrassment.</p> <p>Sample of sexual form case raise at Navo Estate. Date complaint received: 10 April 2019. Complainant: Mrs. M**** Joe, Mrs. J***** Avata, Mrs. R***** Lobao and Mr. A***** Walter (EFB Tractor Driver). Nature of complaint/grievance: received complaint from EFB Transport Female employees that Mr. J**** Torr has been sexually harassing them. Complaint received by General Plantation Manager and GM Assisstant. Action taken as response of this issues: Investigating with both parties (harasser and complainant) Report compiled Conseling by Graham Colman (previously as Transport Manager) Warning issued Action taken done at 6 May 2019. After counselling, both parties are agree with the final decision. The final decision is issuing final warning notice using Employee Warning Notice form FOR-HR-ADM-007-02). FINAL WARNING to Mr. J**** Torr (Empy. Number 11036) issued by Noki Wari (transport supervisor). Supervisor comments within FINAL WARNING that this is the first and last case related to sexual harassment context for J**** Torr. If its happen again then the company will terminated him. This process has been following the Procedure for Dealing with Complaints of Sexual Harrassment (within Employee Handbook – Rev. Jan. 2015).</p> <p>Awareness on 11 October 2019 for all Transport Department at Navo, attended by 25 employees).</p> <p>Company policies awareness (including Sexual Harrassment Policy) has been conducted in 31 July 2019. Attended by 60 workers (Atata</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | <p>Plantation); 13 September 2019 (attended by 141 workers at Kiba Plantation).</p> <p>Barema POM made awareness on sexual harassment policy, dated 23 August 2019 for 11 workers, including welders, process attendants, fitter machinist, KCP supervisor.</p> <p>Awareness on Sexual Harassment policy in Pandi Estate, dated 13 June 2019, explaining: Sexual harassment in unwanted or unwelcomed behaviour towards same of opposite sex; thi strictly prohibited in workplace. Sexual harassment can be verbally such as tok Nogut” or touching som without permission. Sexually harassment at workplace is a gross misconduct and so leads to termination of employment for person doing it. The awareness session was attended by 65 workers, comprise of: harvesters, wheelers, loose fruit collectors, sprayers, drivers, carpenters, fertilizer applicators, housewives.</p> <p>In Navo POM; Explanation on Protection of Reproductive Right policy, dated 24 March 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> | |
| | <p>Associated Smallholder Requirement:</p> <p>Associated Smallholders must be able to verbally explain that they understand and observe this requirement.</p> | <p>During the smallholder field assessment, the auditor team had interviewed the female household (Dorcas Kavelu – 1352; Kesia August – 1251; Kesia Bueli – 1221; Magalina - 299) and confirmed that they understood about the understanding of violence and harassment which was been explained to them during field day. They understood that if there is any harassment, it can be brought up to HOPL and/or resolved it internally within the clan. Hargy Oil Palms Limited and OPIC have disseminated policy to prevent sexual harrasment to associated smallholder during field day.</p> | Yes |
| 6.9.2 | <p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> | <p>Policy on the Protection of Reproductive Rights No.POL-HRD-GEN-014-02, issued on 7 June 2019, issue No.2; Communicated to all level of workforce: 16 August 2019: Policies Review Updates 2019 awareness. Location: Makakiwa. Attended by 17 persons/staff.</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>- Major compliance -</p> | <p>09 August 2019: HOPL Company Policies. Location: Conference Room. Attended by 26 persons (supervisor and employees)</p> <p>20 September 2019: Awareness on Updated/Reviewed Policy. Location: Main Boardroom GM Office. Attended by 8 persons/staff.</p> <p>25 September 2019: Updated Policy Awareness. Location: CEO Boardroom. Attended by 13 persons (including 2 representative of Division Manager of Smallholders).</p> <p>25 September 2019: Awareness on Updated Policy. Location: HR Conference Room. Attended by 9 persons/management staff.</p> <p>Barema POM made awareness on policy to protect reproductive rights, dated 24 August 2019 for 18 workers, including ramp operators, press attendant, power house attendant, press attendants, boiler operator, sterilizer operator, clarification attendant.</p> <p>Based on interview with two female workers at Barema Mill (Mrs. Lornah Galgal and Mrs. Roseline Misiliu), the company support the reproductive rights to all female workers. In example: providing Maternity leave for 66 days and no discrimination of recruitment. She informed that the communication are based on induction prior to work, written in the employment form and available in the notice board. Also, there is Welfare Officer that coming frequently to the compound for sharing of women issues and will be address/report to HR Department.</p> <p>In Navo POM: the Explanation on Protection of Reproductive Right policy, dated 24 February 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> <p>The regular Gender Committee meetings are held on a quarterly basis. The last meeting was held on 27 September 2019 which was attended by Mrs. Claire August (Welfare Officer) Mr. Edward Philip (Senior Welfare Officer) Mr. Darren Stott (GM HR Department) Mrs. Lina Kadada (Emergency Response Nurse Officer)</p> | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | Mrs. Margaret Voklus (Internal Audit Manager) In the meeting discussed about Whistle Blower Policy, ToR Review, Gender Committee Evaluation, Sexual Harrassment. | |
| | Associated Smallholder Requirement: Associated Smallholders must be able to verbally explain that they understand and observe this requirement. | During the smallholder field assessment, the auditor team had interviewed the female household (Dorcas Kavelu – 1352; Kesia August – 1251; Kesia Bueli – 1221; Magalina - 299) and confirmed that they understood about the simply understanding of policy to protect the reproductive rights. | Yes |
| 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 - | Sample of sexual form case raise at Navo Estate. Date complaint received: 10 April 2019. Complainant: Mrs. M**** Joe, Mrs. J***** Avata, Mrs. R***** Lobao and Mr. A***** Walter (EFB Tractor Driver). Nature of complaint/grievance: received complaint from EFB Transport Female employees that Mr. J**** Torr has been sexually harassing them. Complaint received by General Plantation Manager and GM Assistant. Action taken as response of this issues: Investigating with both parties (harasser and complainant) Report compiled Conseling by Graham Colman (previously as Transport Manager) Warning issued Action taken done at 6 May 2019. After counselling, both parties are agree with the final decision. The final decision is issuing final warning notice using Employee Warning Notice form FOR-HR-ADM-007-02). FINAL WARNING to Mr. J**** Torr (Empy. Number 11036) issued by Noki Wari (transport supervisor). Supervisor comments within FINAL WARNING that this is the first and last case related to sexual harassment context for J**** Torr. If its happen again then the company will terminated him. This process has been following the Procedure for Dealing with Complaints of Sexual Harrassment (within Employee Handbook – Rev. Jan. 2015). Within the procedure, it was explain that anonymity and protection of complainants are considered during counselling or resolving the issues, where it is requested. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | OFI: record of counselling/mediation process should be signed with both parties and witnesses. | |
| Criterion 6.10 | | | |
| Growers and millers deal fairly and transparently with smallholders and other local businesses. | | | |
| 6.10.1 | <p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p> | <p>Hargy Oil Palms Limited have calculated the FFB price on monthly basis. Recorded under Smallholders FFB Price Calculation. The calculation based on US\$ price for CPO CIF Rotterdam; US\$ price for PKO Rotterdam; US\$ price for PKE Australia; less equate to FOB; Average extraction rate for PKO @24.12%; Average extraction rate for PKO @2.06%; exchange rate to Kina; Palm product value of 1MT of FFB Kina; Farmers pay out ratio at 57%; add 1% VAT; Less OPRA Levy Less Sexava Levy; Les OPIC Levy; Less VAT10% on OPIC Levy; Mill Gate Price; Less FFB Trasport Costs – to get the Farm Gate Price.</p> <p>September 2019: US\$ price for CPO CIF Rotterdam US\$ 562.60; US\$ price for PKO Rotterdam US\$ 661.81; US\$ price for PKE Australia US\$ 0.00; less equate to FOB; Average extraction rate for PKO @24.12% US\$ 115.84; Average extraction rate for PKO @2.06% US\$ 11.94; exchange rate to Kina 0.294; Palm product value of 1MT of FFB Kina PGK 434.62; Farmers pay out ratio at 57% PGK 247.74; add 1% VAT PGK 2.48; Less OPRA Levy -PGK 2.00; Less Sexava Levy -PGK 2.50; Less OPIC Levy -PGK 4.00; Less VAT10% on OPIC Levy -PGK 0.40; Mill Gate Price PGK 241.31; Less FFB Transport Costs –PGK 58.22</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | Farm Gate Price PGK 183.09 | |
| 6.10.2 | <p>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).</p> <p>- Major compliance -</p> | <p>There is no middleman transaction between the smallholders and HOPL. All transactions are stated in the fortnightly payment slip received by the smallholders. The FFB pricing has been determined according to the original formula agreed in the PNG Government and the company Master Agreement on Bialla Project dated 30 June 1977.</p> <p>The formula to calculate the FFB pricing includes: Value of 1MT of FFB which includes cost of insurance freight (CIF Rotterdam), oil extraction rate, foreign exchange rates. Farmers Payout ratio to ensure both smallholder and company profitability. The payout ratio for the smallholders was determined to be 57% according to the Pricewater Cooperhouse report. Interview with the smallholders confirmed they understand the FFB pricing structure.</p> <p>The FFB Price considering of CPO Price at CIF Rotterdam; PKO Price at Rotterdam; PKE Price at Australia; Average of OER; KER; PKER. Deduction of the FFB price is consist of farmers pay out ratio (57%); VAT (1%); OPRA levy; Sexava levy; OPIC levy; VAT 10% on OPIC levy and FFB transport cost (if using FFB trasnsport by company).</p> <p>The FFB price is documented and publicly available.</p> <p>Related to transport cost and road maintenance: Block holders have to report road damaged condition directly to Smallholders Department who will identify the block ID then submit a requisition for Road Fleet to repair damaged roads on assessment. Note that after rain damage affects roads it is not advisable to immediately repair the road unless the road is thoroughly dry (3 – 4 days longer depending on frequency of rain) to prevent further damaging road. Due to the unprecedented rainfall we have had in 2019 and a blowout in Road Fleet budget it is acknowledged some roads have not been repaired in a timely manner.</p> | Yes |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <p>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.</p> <p>- Minor compliance -</p> | <p>The contract agreement between the smallholders and HOPL is referred back to the original Master Agreement on Bialla Project dated 30 June 1977. The contract stated that HOPL has the obligation to purchase all FFBs produced by smallholders from both the Land Settlement Scheme and the Village Oil Palm scheme.</p> <p>Contract Type: Smallholders FFB Cartage Service Contract Name: Kijomhal Transport (Certificate of Registration of Business: 6-213980, registered on 11 Apr 2017) Date of contract: 31 December 2018 Contract between: HOPL and Kijomhal Transport. Vehicle Rego No: RAL 674; KAG 796. Validity contract: 31 December 2018 – 31 December 2019. Signed by CEO HOPL (1 August 2019); Contractor (1 August 2019) and witness.</p> <p>Payment receipt No.12177010 Source Account: 1000875490 Dated: 27 September 2019 Amount: PGK11,303.16</p> <p>Contract for Road Maintenance Contractor Prequalification Document Contractor name: KUNJ Limited Registered owner: KIMANA MONDA Duration: 1 January 2019 – 31 December 2020 Payment: Receipt No.SR00001425, dated 27 June 2019.</p> | <p>Yes</p> |
| <p>Associated Smallholder Requirement: Associated Smallholders must be able to verbally explain that they understand and observe their obligations and the</p> | <p>All smallholder interviewed has understood their obligations and the obligations of the Company. Associated smallholder interviewed understand that the sales of FFB to Hargy Oil Palm’s Palm Oil Mill are based on their legal ownership of the land, the FFB coming from their oil palm block and the weighing of FFB and loose fruit are given a docket and payment slip as evidence of sales.</p> | <p>Yes</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | obligations of the Company to whom they are selling their fruit. | During the smallholder field assessment, the auditor team had interviewed the blocks owner and asking where they selling all FFB's. it is clearly that the smallholders understood the obligations of selling the FFB to HOPL Mills. | |
| 6.10.4 | Agreed payments shall be made within 14 days of fruit collection or delivery to the mill. - Minor compliance - | Sample of smallholders payment advice: Block 010344 – Erick Wali. FFB collected on 24 September 2019. Paid on 4 October 2019. Block 010278 – Markus Lukara. FFB collected on 3 August 2019. Paid on 10 August 2019. Block 010299 – Mangalina John. FFB collected on 31 August 2019. Paid on 7 September 2019. Block 080816 – Michael Willimon. FFB collected on 4 September 2019. Paid on 7 September 2019. Block 121221 – Kesia Bueli. FFB collected on 10 September 2019. Paid on 21 September 2019. Block 131352 – Dorcas Kavelu. FFB collected on 19 September 2019. Paid on 21 September 2019. Block 131324 – Ropa Matamuli. FFB collected on 24 September 2019. Paid on 4 October 2019. Block 131367 – Gabriel Salua. FFB collected on 5 September 2019. Paid on 7 September 2019. | Yes |
| 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 - | Contribution to local communities is by involving local people to trading in compound canteen and bounded by lease agreement. The canteen building is build by the company. Example: Canteen at Kiba Compound (Navo Estate) Trade Store Lease Agreement HOPL and PAU Trading, dated 1 March 2019. The lease fee is K500/month and lease period is monthly basis. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>Program for local development is provided by HOPL. The program as follow:</p> <p>Strategic Management and Planning For Community Strengthening Course Session. Training for Community-Based Organizations Management at Navo (September 2019).</p> <p>Vamakuma Incorporated Land Group Executive Management Committee, Management and Planning Standard Office Procedure. Bago Village, Bago Ward. Central Inland Pomio Local Government Area, September 2019.</p> <p>Training of Community Mobilizers, Navo 1 June 2019.</p> <p>Brief Report of the meeting with Fresh Produce Development Agency (FPDA) and field visit, dated 25 March 2019. Discussion topic during the meeting is Vegetable Farming Project Proposal. Within the proposal, there is 6 crops that were proposed for the farmers (English cabbage, Steak tomato, carrot, capsicum, saladeer and lettuce). All the seeds already purchased and location in Tiauru Section 3 and Wilelo. Field visit on 26 March 2019, the contribution that already developed was Vegetable Garden Plot, Duck Farm, Chicken Farm, Integrated Farm (partnership between East New Britain Local Level Government and FPDA, Department of Agriculture and Livestock and National Fisheries Authority.</p> <p>Training of Nursery Establishment and Site Selection for Vegetable Farming, dated 12 August 2019. Located: Tiauru Section 3. Facilitator: Masiala Daniels. Attended by 20 smallholders (13 female, 7 male).</p> | |
| 6.11.2 | <p>Where there are associated Smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p> <p>- Minor compliance -</p> | <p>The 2019/2020 budget was reviewed and confirmed that resources has been allocated for smallholders.</p> <p>Efforts made by HOPL to improve smallholders productivity through awareness during Field Days and Block Inspection made by OPIC.</p> | Yes |
| | <p>Associated Smallholder Requirement:</p> <p>6.11.2 Associated Smallholder should participate in Field Days and other extension activities delivered by OPIC and</p> | <p>Sample of Field Day record:</p> <p>VOP</p> <p>29 Jan 2019. Location: Cenaka Division; Urumaili Sub-Division. Officer: Dessie Sapau. Attended by 22 smallholders (15 female, 7 male). Topic of</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | Company Smallholder departments. Companies shall maintain records of Smallholder productivity. | <p>Field day is Circle Weeding Demonstration. The some point to presented during field day is:</p> <ul style="list-style-type: none"> Market Place Preparation Net installation Circle and Path weeding Manual weeding Chemical Weeding Loose fruit collection <p>Advantages and Disadvantages between Manual and Chemical Weeding. 27 March 2019. Location: Meramera Division; Malaso Sub-Division. Officer: Cleophas, Peter Mopa, Christopher and Temah. Attended by 25 smallholders (7 female, 18 male). Topic: BMP, Production, Fertilizer Application and Mama Loose Fruit (MLF). The field day training and demonstration are:</p> <ul style="list-style-type: none"> Pruning, U-Box Stacking, Harvesting technique Fertilizer application (partnership with OPRA Officer) <p>The rest was same as above theme/topics</p> <p>LSS 5 September 2019. Location: Tiauru LSS Block 010273. Attended by 34 LSS smallholders (13 female and 21 male). Facilitator: Smallholders Agricultural Assistant S (SHAAS) Team. Training Day topic: Crop Quality, Buffer Zones and Cover Crop.</p> | |
| <p>Criterion 6.12 No forms of forced or trafficked labour are used.</p> | | | |
| 6.12.1 | <p>There shall be evidence that no forms of forced or trafficked labour are used.</p> <p>- Major compliance -</p> | <p>In Pandi Estate, awareness on Force or trafficked labour policy, dated 13 June 2019, explaining: No employees are allowed to do what they decided not to do or feel that it is unsafe for them. No employee should be forcefully moved from one division to other. If any supervisor seen to be doing that, should immediate report the compliance desk or raise grievance/complaint form. The awareness session was attended by 65 workers, comprise of:</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>harvesters, wheelers, loose fruit collectors, sprayers, drivers, carpenters, fertilizer applicators, housewives.</p> <p>In Navo POM, company provide explanation on trafficked labour policy, dated 22 February 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> | |
| | <p>Associated Smallholder Requirement:</p> <p>Associated Smallholders must be able to verbally explain that they understand and observe this requirement.</p> | <p>All smallholder interviewed has understood that no forms of forced or trafficked labour can be used. No forms of forced or trafficked labour observed during field visit to smallholder area.</p> | Yes |
| 6.12.2 | <p>Where applicable, it shall be demonstrated that no contract substitution has occurred.</p> <p>- Minor compliance -</p> | <p>All plantations and general mill workers are PNG National. There is no evidence that HOPL had employed foreign workers. Therefore, there was no possibility that HOPL had involved in any form of contract substitutions. The terms and condition of all employee of HOPL is stated in the Employee Manual. The general terms and conditions of all employed workers are equal (may different due to working grades). Hence there is no possibility of contract substitution from the point the workers were employed until the point they start working.</p> | Yes |
| 6.12.3 | <p>Company labour policies shall be established and implemented and apply to both permanent and casual labour.</p> <p>- Major compliance -</p> | <p>Hargy Oil Palms Limited established Policy against Forced or Trafficked Labour No.POL-HRD-GEN-004-03, issued on 7 June 2019, Issue No.3. All the workers is permanent employees and has contract/agreement with HOPL.</p> <p>On 24 July 2019, Barema POM made awareness on company policy related to forced/traffic labour for 26 mill workers, comprise of admin clerk, laboratory attendant, processing operator, welder, upkeep, maintenance department, electrician.</p> | Yes |
| <p>Criterion 6.13</p> <p>Growers and millers respect human rights.</p> | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 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 - | <p>Policy to respect of human rights was revised due to new organisation structure. Document of Policy on Human Rights No.POL-HRD-GEN-005-03, issue date 7 June 2019, issue No.3, issued by Compliance Department.</p> <p>In Barema POM; On 25 July 2019, Barema POM made awareness on human right policy for 28 mill workers, comprise of admin clerk, laboratory attendant, processing operator, KCP operator, maintenance department.</p> <p>In Navo POM, the Policy on Human Rights have been disseminated on 10 March 2019. Attended by 5 employees; powerhouse operator, sterilizer, oil room, boiler, press station.</p> | Yes |
| Principle 7: Responsible development of new plantings | | | |
| Criterion 7.1 | | | |
| A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations. | | | |
| 7.1.1 | An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented - Major compliance - | Hargy Oil Palm Limited provides document: HOPL Site Specific Environmental Aspects and Impact Register. Hargy also prepared Social Impact Assessment for the new development in addition to the Environmental Plan. The company have completed a full Social and Environmental Impact Assessment for new planting development. The Social Impact Assessment included consultation with local stakeholders. The SEIA identified all major impacts of all activities. The results of the SEIA have been incorporated into plans for the new plantings through the Management guidelines prepared Procedure for New Development No.PRO-ESD-GEN-001-09, dated 10th February 2016. Hargy Oil Palm Limited has a Research Assistant, a Small Business development Officer and Community Relations Officer; to work as a sub-component of Community Relations to operationalize the monitoring and management of social impacts. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 7.1.2 | <p>Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts and to enhance identified potential positive aspects.</p> <p>- Minor compliance -</p> | <p>No changes during Surveillance assessment.</p> <p>Procedure for new development No.PRO-ESD-GEN-001-09 stated that new development must meet company prerequisites to include review upon Buffer/HCV maps, soil maps, slopes class maps, topography maps. Road design and plantation layout; Operational plan including activity scoping, work schedule, planting programme, road maintenance, management plan for fragile soil area, management plan for HCV and buffers; Environmental aspect related to New Development and Mitigation; Social Impacts of New Development and Mitigation. The "Social Management/Improvement Plan Update 2018 has been established and was reviewed from 2017. The management plan is incorporated to the management plant stated in 6.1.2 and 6.1.3.</p> <p>No changes during Surveillance assessment.</p> | Yes |
| 7.1.3 | <p>Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention.</p> <p>- Minor compliance -</p> | <p>The impacts of the scheme and the implications of the way it is managed were documented under Planting Application Form, as well as plan to manage the impacts produced. However, there is no new development of the area after the approval of 1st NPP for 10,000 Ha. There was no identified new development from smallholders.</p> <p>No changes during Surveillance assessment.</p> | Yes |
| <p>Criterion 7.2</p> <p>Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p> | | | |
| 7.2.1 | <p>Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations.</p> <p>- Major compliance -</p> | <p>The certificate holder has had management strategy for fragile and problem soils and it is stated in the SOP for New Development No.PRO-ESD-GEN-001-10, issue No.10, dated 15 April 2018. It was stipulated in page 3: Consideration for New Planting Procedures Soil Surveys & Topographic Information. Extensive planting on steep terrain, and/or on marginal soils, is avoided. The requirements are:</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | <p>Where limited planting on fragile and marginal soils is proposed, plans (including maps) shall be developed and implemented to protect soils thus minimising adverse environmental and social impacts; Avoid planting on slope in excess of 25° slope; Avoid planting on contiguous areas of peat soils >3m deep and >150 Ha in extent.</p> <p>Soil surveys and topography information are used for site planning the establishment of new plantings, and the results are incorporated into plans and operations. Requirements are: Soil suitability map or soil surveys adequate to established the long-term suitability of land for oil palm cultivation should be available; Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure should be available.</p> <p>During field visit at Kerakera plantation in Block 97J04 and 15K06; Bakada Plantation Block 11C02 and 11B02; Atata Plantation Block Q24 and 00021 verified in flat area (<50), whilst in Kerakera Plantation Block 01L01 is verified on small slope area border with buffer zone (10-150 slope). The palm trees of Block 01L01 were planted in 2001; the strategy to prevent run-off and soil erosion was by implement frond stacking and maintains the cover crops. Soil condition in this area is volcanic soil which fragile. Based on field observation in Kerakera plantation in Block 15K06; Bakada Plantation Block 11C02 and 11B02 the oil palms are very well covered with legume cover crops (Pueraria javanica and Calopogonium mucunoides). The plantation management implements terracing in Block 12B09 Div. 1 (Alaba) to avoid soil erosion and maintain the cover crops as well.</p> | |
| 7.2.2 | Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. | <p>There are adequate topographic information based on Topography map of Bialla Project 2017, scale 1:115,000, dated June 2017. The map consist of Hargy Plantation, Barema Plantation, Karla Plantation, Ibana Plantation, Bakada Plantation, all smallholders and all Mills. Based on the Slope map of Hargy Estate, Navo Estate and Pandi Estate scale 1:41,000, the slope class is dominated < 5 degrees slope. Average</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | - Minor compliance - | <p>slope area in Kerakera plantation is < 5 degrees (dominated); 5-10 degrees (spreads in southern side); 10-15 degrees (particular area in Souther side). Average slope area in Bakada plantation is < 5 degrees (dominated); 5-10 degrees (spreads in Western side); 10-15 degrees (particular area in Western side). Average slope area in Atata plantation is < 5 degrees (dominated); 5-10 degrees (spreads in Eastern side); 10-15 degrees (particular area in Eastern side).</p> <p>During field visit at Kerakera plantation in Block 97J04 and 15K06; Bakada Plantation Block 11C02 and 11B02; Atata Plantation Block Q24 and 00021 verified in flat area (< 5 degrees), whilst in Kerakera Plantation Block 01L01 is verified on small slope area border with buffer zone (10-15 degrees slope). The palm trees of Block 01L01 were planted in 2001; the strategy to prevent run-off and soil erosion is by implement frond stacking and maintain the cover crops. Soil condition in this area is volcanic soil which fragile. Based on field observation in Kerakera plantation in Block 15K06; Bakada Plantation Block 11C02 and 11B02 the oil palms are very well covered with legume cover crops (Pureira javanica and Calopogonium mucunoides). The plantation management implement terracing in Block 12B09 Div. 1 (Alaba) to avoid soil erosion and maintain the cover crops as well.</p> | |
| <p>Criterion 7.3</p> <p>New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values</p> | | | |
| 7.3.1 | There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and | Extension area in Bakada Plantation, in example Block 16A12, Div. 1 (Alaba), the palm planted in 2016. This area already covered within NPP that has been submit and approve by RSPO. Based on HCV Study – Mengen, Bakada and Bialla, Oil Palm Expansion Program. The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | <p>managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).</p> <p>- Major compliance -</p> | <p>forest for extension area. Land Use Change Analysis (LUCA) is not yet required for the certificate holder due to NPP submitted to RSPO. No changes during Surveillance assessment.</p> | |
| 7.3.2 | <p>A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status.</p> <p>- Major compliance -</p> | <p>Extension area in Bakada Plantation, in example Block 16A12, Div. 1 (Alaba), the palm planted in 2016. This area already covered within NPP that has been submit and approve by RSPO. Based on HCV Study – Mengen, Bakada and Bialla, Oil Palm Expansion Program. The HCV study conducted by Douglas Environmental Services in February 2009. According this assessment that within Alangily, Gamupa and Alaba area, there is no HCV are presented. There is no new planting have replaced primary forest for extension area. Land Use Change Analysis (LUCA) is not yet required for the certificate holder due to NPP submitted to RSPO. No changes during Surveillance assessment.</p> | Yes |
| 7.3.3 | <p>Dates of land preparation and commencement shall be recorded.</p> <p>- Minor compliance -</p> | <p>Records of land preparation is available. No changes during Surveillance assessment.</p> | Yes |
| 7.3.4 | <p>An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower’s relevant operational procedures (see Criterion 5.2).</p> <p>- Major compliance -</p> | <p>Management plan is following conservation plan. Refer to Criteria 5.2. No changes during Surveillance assessment.</p> | Yes |
| 7.3.5 | <p>Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations,</p> | <p>Management plan is following conservation plan. Refer to Criteria 5.2. No changes during Surveillance assessment.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| | <p>shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).</p> <p>- Minor compliance -</p> | | |
| <p>Criterion 7.4 Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.</p> | | | |
| <p>7.4.1</p> | <p>Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided.</p> <p>- Minor compliance -</p> | <p>There are available map identifying soil type based on Topography map of Biiala Project 2017, scale 1:115,000, dated June 2017. The map consist of Hargy Plantation, Barema Plantation, Karla Plantation, Ibana Plantation, Bakada Plantation, all smallholders and all Mills.</p> <p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, Hargy Pit 1 Soil description was as follows: Parent material: Volcanic alluvial materials; Landform: Alluvial plain on foot slope; Slope: Flat; Previous land use: Logged forest; Vegetation: Logged secondary forest; Surface features: Thick litter layer and no outcrops, deep water trench common feature; Groud cover: good ground cover with forest under growth; Soil drainage: well drained; Comments: there were no stones and gravel found throughout the profile, there were orange inclusions at 150-200 cm depth; Description: Brown (10YR 4/3); sandy clay loam; friable; weakly developed fine-medium sub angular blocky structure; slightly sticky; plastic; many fine pores; rapid porosity; many fine and medium and few coarse roots, diffuse boundary to.</p> | <p>Yes</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|---|------------|
| | | <p>Below are detail of soil type in HOPL:</p> <p>Yanaswali Plantation – Vamakuma Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:16,950. ±90% is Sandy clay loam; 10% is River gravel.</p> <p>Yanaswali Plantation – Sena Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:17,200. 100% is loamy sand/gravel.</p> <p>Bakada Plantation – Magalona Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:20,230. ±65% is loamy sand/gravel; ±35% is loamy sand.</p> <p>Karla Plantation Soils. Scale 1:40,200. Surface soil texture: ±70% is sand to loamy sand, ±20% is loam to sandy loam, 10% is heavy loam to sand clay loam.</p> <p>Ibana Plantation Soils, Scale 1:37,440. Surface soil texture: 100% is sand to loamy sand.</p> <p>Hargy Plantation Soils. Surface soil texture: sand to loamy sand (15%), heavy loam to sand clay loam (68%), clay loam to silty clay loam (5%), No data (10%), organic loam to sandy clay loam (2%).</p> <p>Barema Plantation Soils. Surface soil texture: silty clay (70%), organic loam to sand clay loam (15%), clay loam to silty clay loam (15%).</p> <p>Bakada Plantation - Alangily Soils, scale 1:26,590. Surface soil texture: sandy loam (90%), loamy sand (10%).</p> <p>Bakada Plantation – Alaba Soils, scale 1:31,110. Surface soil texture: loamy sand/gravel (80%), loamy sand (20%).</p> <p>Bakada Plantation – Abulmosi soils, scale 1:25,290. Surface soil texture: loamy sand/gravel (90%), loamy sand (10%).</p> | |
| 7.4.2 | <p>Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts.</p> <p>- Major compliance -</p> | <p>The strategy to maintain the soil that been conducted by the plantation is mulching by EFB. Based on field visit at Kerakera Plantation Block 01L01 and Atata Plantation Block 00O21, the frond stacking and EFB mulching are applied on the field. EFB application recorded in Hargy Estate, Division 3 (Kerakera Plantation) application in August 2019 are 768 tons manual and 185 tons mechanic.</p> <p>In Pandi Estate Alangily Division (295.7 ha) todate August 2019 are 30 ton of EFB.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| | | The practices adopted by the management; Frond stacking along the frond path to be arranged in neat and organised manner; Sustainability of ground covers/soft grasses to keep soil humidity; Empty Fruit Bunch (EFB) application. No peat soil was identified within the certified area. | |
| Criterion 7.5 No new plantings are established on local people’s land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. | | | |
| 7.5.1 | Evidence shall be available that affected local peoples understand they have the right to say ‘no’ to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples. - Major compliance - | Agreement with consent from the lease-lease back program are available. Sample of the agreement verified including for Sena ILG LLB and Remaining ILG LLB. Furthermore, there is no new land acquisition by HOPL. No changes during Surveillance assessment. | Yes |
| Criterion 7.6 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements. | | | |
| 7.6.1 | Documented identification and assessment of demonstrable legal, customary and user rights shall be available. | Hargy shows document “Expansion Programme Awareness on Sublease Agreements”. This document is for awareness raising amongst potential lease-lease back smallholders and includes reference to a range of | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | - Major compliance - | legislative aspects including customary land versus state land, a section on the Land Group and the Incorporated Land Group Act (1974), the survey process, HCV aspects, environment and social impact assessment procedures. Agreement with consent from the lease-lease back program are available. Sample of the agreement verified including for Sena ILG LLB and Remailing ILG LLB. | |
| 7.6.2 | A system for identifying people who are the rightful customary owners within the PNG legal system, shall be in place. - Major compliance - | There is a process for identifying those people entitled to compensation when customary land is involved, in line with Social and Environmental Impact Assessment. This system for determining compensation is defined in the PNG Lands Act. This particular development came about via the requests of the local people. Agreement with consent from the lease-lease back program are available. Sample of the agreement verified including for Sena ILG LLB and Remailing ILG LLB. Furthermore there is no new land acquisition by HOPL. | Yes |
| 7.6.3 | A system for calculating and distributing fair payment (monetary or otherwise) shall be in established and implemented, monitored shall in place. This system shall take into account: gender differences in the power to claim rights, local community customary ownership of land, access to land for customary purposes and the requirements of the PNG Government's "Valuer General's Guide". The procedure should recognise different mechanisms for agreement on the right to use the land ranging from outright purchase to leases and CLUAs of varying durations. Payments may include royalty component based on production and the means of distribution must also be defined. | HOPL has procedure "Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development" dated 1 March 2015. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | - Major compliance - | | |
| 7.6.4 | Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. - Minor compliance - | The compensation offered, based on the New Britain Palm Oil model, PGK20 hectare for vacant land (i.e. buffer zones/areas too steep to plant) and PGK75 hectare for planted areas. Additionally, there is a PGK150/hectare payment upon the signing of a sub-lease agreement. Added to this there is a royalty payment on the fruit which is 10% of the smallholder FB price paid on a monthly basis. Furthermore, indirect compensation as people benefit from the new development via improved economy, paid employment, improved education facilities, housing, medical facilities and better infrastructure as a result. | Yes |
| 7.6.5 | 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, with the agreement of the parties concerned, to the extent that damage to the interests of the affected parties will not result - Minor compliance - | The 2019 payment was verified during the assessment. The records e.g. bank payment slips are available. | Yes |
| 7.6.6 | Evidence shall be available that the affected communities and rights holders have access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance - | HOPL shows document "Expansion Programme Awareness on Sublease Agreements". The affected communities are able to inform the assessment team that the agreement was signed without forced by the company and the legal representative is selected by themselves. | Yes |
| Criterion 7.7 | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice. | | | |
| 7.7.1 | There shall be no land preparation by burning. - Major compliance - | Zero burning policy already stated within Environmental Aspect Impacts Master Register and Waste Management Plan. | Yes |
| | Associated Smallholder Requirement: Associated Smallholders must be able to verbally explain that they understand and observe this requirement. | Based on interview with associated smallholder, they understand that no land preparation can be done by burning. The typical land preparation done by the smallholder was through brushing, continued by gardening and as the land ready – they continue with planting oil palms. Pre-Planting Activity Checklist is a form to be checked by smallholders supervisor prior the smallholders planting the palms. Sample of the LSS checklist as follow: 031952 Primus Aulai: Sighted Survey Plan for Portion No.1948-1959 Catalogue No.15/629 dated 7 November 1990 – in the Survey Plan, Portion No.1952 sets 6.53 Ha. Application for a Replacement Title for Land: Portion 2002; Milinch Ulawun; Fourmil Talasea; West New Britain Province; Pre-planting Activity Checklist for Block No.1952; Area Kabaiya; Owner Primus Aulai; planting stage: Replanting; Area for 2 Ha (240 palms); use of fire: Nil – review done by Moale Henad and Chris Tondiwi dated 4 October 2018. Planting Approval Form – Replant dated 16 August 2018. Block No.1952; Area Kabaiya LSS; Owner Primus Aulai; planting stage: Replanting; Area for 2 Ha (240 palms); Total block area: 6 Ha; Proof of Ownership: Yes; Vegetation OK; Buffer Zone OK; Topograpghy Prequalification: Sloping 5-100; Threatened species NO; Wildlife management area NO; Peat soil present NO; – review done by Paul Asei. Fire use is aim to food gardening, not for land preparation. | Yes |
| 7.7.2 | In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in `Guidelines for the | There is no open burning of land preparation has occurred in the certificate holder area. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| | Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance - | | |
| | Associated Smallholder Requirement: Associated Smallholders must be able to verbally explain that they understand and observe this requirement. | Based on interview with associated smallholder, they understand that no land preparation can be done by burning. The typical land preparation done by the smallholder was through brushing, continued by gardening and as the land ready – they continue with planting oil palms. | Yes |
| Criterion 7.8 | | | |
| New plantation developments are designed to minimise net greenhouse gas emissions. | | | |
| 7.8.1 | The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. - Major compliance - | The Certificate Holder is not required to calculate or conducting Carbon Stock Assessment for extension area, because NPP for this area is submitted prior NPP 2015 version where no requirement for Carbon Stock Assessment. To calculate GHG emissions, the Certificate holder using RSPO Palm GHG calculator version 3.0.1 as mentioned in Criteria 5.6. | Yes |
| 7.8.2 | There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options. - Minor compliance - | The Certificate Holder is not required to calculate or conducting Carbon Stock Assessment for extension area, because NPP for this area is submitted prior NPP 2015 version where no requirement for Carbon Stock Assessment. To calculate GHG emissions, the Certificate holder using RSPO Palm GHG calculator version 3.0.1 as mentioned in Criteria 5.6. | Yes |
| Principle 8: Commitment to continual improvement in key areas of activity | | | |
| Criterion 8.1 | | | |

| Criterion / Indicator | Assessment Findings | Compliance | |
|---|--|---|------------|
| <p>Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p> | | | |
| <p>8.1.1</p> | <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides (Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. <p>- Major compliance -</p> | <p>The latest Environmental Policy (POL-ESD-EMS-001-07, issued No: 7, dated 6 April 2018). The policy covers to minimise adverse environmental impacts from its operations by maintaining and continuously improving the quality of the environment and at the same time increase community confidence in its business activities. SIPEF Group in the course of its operations will:</p> <ul style="list-style-type: none"> - Minimise or eliminate the release of the pollutants to the environment; - Minimise impact on biodiversity and ecosystems whilst carrying out its operations; - Minimise degradation and erosion of land under its control Prevent or minimise any potential adverse environmental impacts arising from its operations, product and services; - Encourage employees to conduct their occupational and personal activities in an environmentally friendly manner; - Promote high environmental performance standards amongst its stakeholders and the industry at large. <p>SIPEF Group is committed to the continuous improvement of its environmental performance by being committed to:</p> <ul style="list-style-type: none"> - Meeting relevant environmental, legal and other compliance requirements; - Preventing pollution; - Continuous improvement; - Communicating and explaining its Environmental Policy to all SIPEF employees, contractors, suppliers and stakeholders; - Allocating adequate resources, including training, to implement its environmental management programmes. <p>Hargy Oil Palm Limited: Company demonstrates "2019 Action Plan for Continual Improvement in Sustainable Performance" PLN-ESD-GEN-001-</p> | <p>Yes</p> |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|--|---------------|--------|-------------------|--|--|--|---|---|----------------------------------|--------------------------|--|--|--|--|---|--|--|--|---|--|--|--|----------------|---|---------------------------|----------------------|---|--|--|--|--|---|-------------------------------|----------------------|--|
| | <p>016, approved by General Manager on 15 March 2019. The document identifies the status of planned actions to further improve performance in key areas of minimizing use of certain pesticide, reducing negative and enhance positive environmental impacts, waste reduction, pollution and emissions and social impacts. The plan will be reviewed on annual basis.</p> <p>Below are ongoing and completed action plan.</p> <table border="1" data-bbox="1115 635 1899 1390"> <thead> <tr> <th>Indicator</th> <th>Planned Improvement</th> <th>Outcome - PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td colspan="4" style="text-align: center;">Pesticides</td> </tr> <tr> <td>RSPO P&C 4.6.7 – No paraquat or insecticides to be supplied to smallholders by plantation companies or smallholder management organisations</td> <td>Currently compliant and no further action is required</td> <td>N/A – Smallholder Manager / OPIC</td> <td>Compliance is maintained</td> </tr> <tr> <td colspan="4">BSI Audit team: Based on field visit, no paraquat and/or trunk injection carried out by smallholder.</td> </tr> <tr> <td>RSPO P&C 4.6.9 – Maintenance of employee and associated smallholder knowledge and skills on pesticides handling shall be demonstrated, including provision of appropriate information materials</td> <td>OPIC has trained smallholder growers and certificate has been issued. HOPL will only issue Glyphosate 360 herbicide in 5 litre containers to certified smallholders.</td> <td>Trained and competent smallholders, higher yield Estate Managers ESD Manager</td> <td>This is ongoing to maintain compliance</td> </tr> <tr> <td colspan="4">BSI Audit Team: Based on field visit, smallholder has provided with training.</td> </tr> <tr> <td>RSPO P&C 4.6.9</td> <td>Currently compliant and no further action is required</td> <td>N/A – Plantation Managers</td> <td>Continued monitoring</td> </tr> <tr> <td colspan="4">BSI Audit Team: Based on field visit, sprayer has been provided with appropriate PPE.</td> </tr> <tr> <td>RSPO P&C 4.6.10 – storage and disposal of all chemical as described in</td> <td>Currently compliant and no further action is required</td> <td>High safety level ESD Manager</td> <td>Continued monitoring</td> </tr> </tbody> </table> | Indicator | Planned Improvement | Outcome - PIC | Status | Pesticides | | | | RSPO P&C 4.6.7 – No paraquat or insecticides to be supplied to smallholders by plantation companies or smallholder management organisations | Currently compliant and no further action is required | N/A – Smallholder Manager / OPIC | Compliance is maintained | BSI Audit team: Based on field visit, no paraquat and/or trunk injection carried out by smallholder. | | | | RSPO P&C 4.6.9 – Maintenance of employee and associated smallholder knowledge and skills on pesticides handling shall be demonstrated, including provision of appropriate information materials | OPIC has trained smallholder growers and certificate has been issued. HOPL will only issue Glyphosate 360 herbicide in 5 litre containers to certified smallholders. | Trained and competent smallholders, higher yield Estate Managers ESD Manager | This is ongoing to maintain compliance | BSI Audit Team: Based on field visit, smallholder has provided with training. | | | | RSPO P&C 4.6.9 | Currently compliant and no further action is required | N/A – Plantation Managers | Continued monitoring | BSI Audit Team: Based on field visit, sprayer has been provided with appropriate PPE. | | | | RSPO P&C 4.6.10 – storage and disposal of all chemical as described in | Currently compliant and no further action is required | High safety level ESD Manager | Continued monitoring | |
| Indicator | Planned Improvement | Outcome - PIC | Status | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pesticides | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RSPO P&C 4.6.7 – No paraquat or insecticides to be supplied to smallholders by plantation companies or smallholder management organisations | Currently compliant and no further action is required | N/A – Smallholder Manager / OPIC | Compliance is maintained | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BSI Audit team: Based on field visit, no paraquat and/or trunk injection carried out by smallholder. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RSPO P&C 4.6.9 – Maintenance of employee and associated smallholder knowledge and skills on pesticides handling shall be demonstrated, including provision of appropriate information materials | OPIC has trained smallholder growers and certificate has been issued. HOPL will only issue Glyphosate 360 herbicide in 5 litre containers to certified smallholders. | Trained and competent smallholders, higher yield Estate Managers ESD Manager | This is ongoing to maintain compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BSI Audit Team: Based on field visit, smallholder has provided with training. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RSPO P&C 4.6.9 | Currently compliant and no further action is required | N/A – Plantation Managers | Continued monitoring | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BSI Audit Team: Based on field visit, sprayer has been provided with appropriate PPE. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RSPO P&C 4.6.10 – storage and disposal of all chemical as described in | Currently compliant and no further action is required | High safety level ESD Manager | Continued monitoring | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Criterion / Indicator | | Assessment Findings | | | | Compliance |
|---|--|--|--|---|---|------------|
| | | the GIFAP Code of Practice. | | | to maintain compliance | |
| | | RSPO P&C 4.6.5 – Only registered agrochemical following PNG labelling guidance will be used. All chemical inputs required an MSDS | Check that all MSDS sheets are updated and available in every store | High safety level - ESD Manager | Continued monitoring to maintain compliance | |
| BSI Audit Team: Based on field visit to all estate, HOPL use registered chemicals, completed with MSDS. | | | | | | |
| General environment improvement plan | | | | | | |
| | | RSPO P&C 4.2.4 – nutrient recycling strategy should be in place | Update list of blocks for EFB annually Annual work program for EFB application per block and monitoring of work program | Reduce requirement for inorganic fertilizer - HoE | Compliance is maintained | |
| | | RSPO P&C 5.1.1 – An environment Impact Assessment (EIA) shall be documented and updated every ten years. | Conduct and document a full Environment Impact Assessment (EIA) for HOPL operation; covering the entire supply bases. | | Compliance is maintained | |
| BSI Audit Team: EFB application record sighted. | | | | | | |
| General Improvement Plan | | | | | | |
| | | RSPO P&C 4.7.2 – All operations where health and safety is an issue have been risk assessed and procedures and actions are documented and implementation to address the identified issues. | Relocation of entrance to Head Office & Hargy Mill, bowser and new road. | Improved vehicle safety – Construction Manager | Compliance is maintained | |
| | | | Painting/colour coding of process pipe line (sludge – brown; CPO – yellow/ orange; water – blue; fire hydrant – red; | Safer workplace – Hargy and Navo Mill Manager | Compliance is maintained | |

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| Criterion / Indicator | | Assessment Findings | | | Compliance |
|-----------------------|----------------|---|--|--------------------------|------------|
| | | | and steam by insulation. | | |
| | | BSI Audit team: Color coding for process pipe line in Hargy POM and Navo POM sighted. | | | |
| | RSPO P&C 4.7.2 | Repairing work on the boiler no.1 re-tubing work | Improve boiler efficiency and cut down diesel generator operation hours – HPOM Manager | Compliance is maintained | |
| | | BSI Audit team: diesel generator operation has been reduced. | | | |
| | RSPO P&C 4.7.2 | Hazard reporting reward structure | Remove potential accidents from workplace superintendents. | Compliance is maintained | |
| | RSPO P&C 4.7.2 | Installation of an additional New Boiler (spare) 40 tonne | Improve production BPOM Manager | Compliance is maintained | |
| | RSPO P&C 4.7.2 | Construct a chemical storage – Vamakuma | Improved compliance Senior Plantation Manager Panc Estate | Compliance is maintained | |
| | RSPO P&C 4.7.2 | Replacement of Mill Building Roofing which is in poor condition | Improve Mill work environment & Safety – HPOM Manager | Compliance is maintained | |
| | RSPO P&C 4.7.2 | Sterilizer condensate Pit & Chamber with piping | Improve Mill work environment & Safety – HPOM Manager | Compliance is maintained | |
| | RSPO P&C 4.7.2 | Building of unit for electrical workshop | Improve Work environment HPOM Manager | Compliance is maintained | |

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| Criterion / Indicator | | Assessment Findings | | | Compliance |
|-----------------------|--|---|--|---|--------------------------|
| | | RSPO P&C 4.7.2 | New EFB Conveyor to EFB yard area | Improved working environment NPOM Manager | Compliance is maintained |
| | | RSPO P&C 4.7.2 | Elevated work platform | New safe working at heights Construction Manager | Compliance is maintained |
| | | RSPO P&C 4.7.2 | Lock out tags | Safer working environment CVWS Manager | Compliance is maintained |
| | | RSPO P&C 4.7.3 – All workers involved in the operation shall be adequately trained in safe working practice | Introduce a section for safety quiz in the newsletter for employees to partake in. | Promote safety awareness for Training Dept | Compliance is maintained |
| | | RSPO P&C 4.7.5/4.7.7 – Accident Emergency and Accident Reporting, LTI Reporting | Develop a pilot centralised reporting of Lost Time Injury | Improved and accurate OHS data and analysis for improvement in OHS – OHS Superintendent | Compliance is maintained |
| | | RSPO P&C 6.5.3 – HOPL provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standard or above, where no such public facilities are available or accessible | Expand welfare office to Navo | Gives greater penetration into social welfare for employees | Compliance is maintained |
| | | RSPO P&C 3.6.2 – Effectiveness of the H&S plan to address health and safety risk to people is monitored | Engaging x2 housing inspectors | Inspecting houses for: Hygiene Safety of houses | Dec-2019 |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | Audit team has reviewed and sighted the progress made, related to continuous improvement. | |

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Appendix B: Approved Time Bound Plan

| Name of company | Name of Mill | Location | Supply Base | Time Bound Plan | Target Year for RSPO |
|-------------------------------|-----------------------|---|--|------------------|---|
| PT. Agro Muko | Muko Muko Mill | Mukomuko Regency, Bengkulu Province, Indonesia | Muko Muko estate, Sei Betung estate, Tanah Rekah estate, Talang Petai estate, Sei Kiang estate and KMD | 2011 | Certified |
| | Bunga Tanjung Mill | Mukomuko Regency, Bengkulu Province, Indonesia | Bunga Tanjung estate, Air Bikuk estate, Air Buluh estate and KMD | 2011 | Certified |
| | | | PT. Mukomuko Agro Sejahtera: - Air Manjunto estate - Malin Deman estate | 2014 | Certified |
| | | | Ex. PT. Asri Rimba Wirabhakti (acquisition in 2018) | 2020 | A new NPP will be submitted waiting for HCV, LUC review |
| PT. Tolan Tiga | Bukit Maradja Mill | Simalungun Regency, North Sumatera, Indonesia | - Bukit Maradja Estate (PT. Eastern Sumatra Indonesia) - Kerasaan Estate (PT. Kerasaan Indonesia) - PT. Timbang Deli Indonesia | 2010 2018 | Certified May 2010 Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatra Indonesia |
| | Perlabian Mill | Labuhan Batu Selatan Regency, North Sumatera, Indonesia | Perlabian estate and Tolan estate. | 2010 | Certified May 2010 |
| PT. Umbul Mas Wisesa | Umbul Mas Wisesa Mill | Labuhan Batu Selatan Regency, North Sumatera, Indonesia | UMW South estate, UMW North estate and Toton Usaha Mandiri estate | 2014 | Certified in March 2015 |
| PT. Agro Kati Lama | | Musirawas Regency, South Sumatera, Indonesia | | 2021 | developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014. |
| PT. Agro Rawas Ulu | | Musirawas Regency, South Sumatera, Indonesia | | 2024 | developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014. |
| PT. Agro Muara Rupit | | Musirawas Regency, South Sumatera, Indonesia | | 2024 | developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014. |
| Hargy Oil Palm Limited (HOPL) | Hargy Mill | East of Bialla, West New Britain Province, PNG | Hargy Estate | 2009 | Certified in April 2009 |
| | Navo Mill | 50 Kms East of Bialla, West New Britain Province, PNG | Navo Estate, Bakada Estate and Mengen Estate | 2009 | Certified in April 2009 |
| | Barema Mill | 30 km East of Bialla, West New Britain Province, PNG | Barema Estate | 2014 | RSPO Certified in April 2014 |
| PT. Dendy Maker Indah Lestari | Dendy Maker Mill | Musirawas Utara Regency, South | Sei Mandang Estate, Sei Liam Estate | 2015 | Acquired on 1 August 2017. RSPO certified in 2015. |

| | | | | | |
|--|--|---------------------------------|--|--|--|
| | | Sumatera Province, Indonesia | | | |
|--|--|---------------------------------|--|--|--|

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **February 2018 – January 2019** for **Hargy POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **February 2018 – January 2019** for **Hargy POM** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 0.37 |
| PKO | 0.37 |

| Extraction | % |
|------------|-------|
| OER | 23.65 |
| KER | 5.81 |

| Production | t/yr |
|--------------|-----------|
| FFB Process | 136044.36 |
| CPO Produced | 32178.73 |
| PKO Produced | 7901.2 |

| Land Use | Ha |
|-----------------------------|----------|
| OP Planted Area | 25949.19 |
| OP Planted on peat | 0 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 0 |
| Total | |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 25801.06 | 0.6 | 0 | 0 | 46807.9 | 7.61 | 72608.96 | 8.21 |
| CO ₂ Emission from fertilizer | 1469.52 | 0.01 | 0 | 0 | 1435.85 | 0.17 | 2905.37 | 0.18 |
| NO ₂ Emmision | 2760.52 | 0.02 | 0 | 0 | 1851.74 | 0.22 | 4612.26 | 0.24 |
| Fuel Consumption | 468.72 | 0.01 | 0 | 0 | 0 | 0 | 468.72 | 0.01 |
| Peat Oxidation | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sink | | | | | | | | |
| Crop Sequestration | -23700.65 | -0.39 | 0 | 0 | -46800.29 | -0.56 | -70500.94 | -0.95 |
| Conservation Sequestration | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

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|--------------|----------------|-------------|---|---|---------------|-------------|-----------------|-------------|
| Total | 6799.17 | 0.25 | 0 | 0 | 3295.2 | 0.03 | 10094.37 | 0.28 |
|--------------|----------------|-------------|---|---|---------------|-------------|-----------------|-------------|

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 3544.05 | 0.03 |
| Fuel Consumption | 1899.54 | 0.01 |
| Grid Electricity Utilisation | 133.32 | 0 |
| Credit | | |
| Export of Grid Electricity | -708.85 | -0.01 |
| Sales of PKS | 0 | 0 |
| Sales of EFB | 0 | 0 |
| Total | 4868.06 | 0.04 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO₂e |
|--------------------------------|-------------------------|
| PK from own mill | 2949.64 |
| PK from other source | 0 |
| Fuel Consumptions | 633.12 |
| Total Crusher emissions | 3582.75 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | 0 |
| Divert to anaerobic diversion (%) | 100 |

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

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The GHG emissions that were produced in **February 2018 – January 2019** for **Barema POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **February 2018 – January 2019** for **Barema POM** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 0.8 |
| PKO | 0.8 |

| Extraction | % |
|------------|-------|
| OER | 24.33 |
| KER | 5.28 |

| Production | t/yr |
|--------------|-----------|
| FFB Process | 177214.36 |
| CPO Produced | 43118.486 |
| PKO Produced | 9358.455 |

| Land Use | Ha |
|-----------------------------|----------------|
| OP Planted Area | 28536.1 |
| OP Planted on peat | 0 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 0 |
| Total | 28536.1 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 60166.94 | 0.68 | 0 | 0 | 44076.89 | 0.58 | 104243.83 | 1.26 |
| CO ₂ Emission from fertilizer | 1977.89 | 0.02 | 0 | 0 | 218.02 | 0.01 | 2195.91 | 0.03 |
| NO ₂ Emmision | 3651.35 | 0.03 | 0 | 0 | 281.17 | 0.02 | 3932.52 | 0.05 |
| Fuel Consumption | 754.78 | 0.01 | 0 | 0 | 0 | 0 | 754.78 | 0.01 |
| Peat Oxidation | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sink | | | | | | | | |
| Crop Sequestration | -32001.61 | -0.38 | 0 | 0 | -41779.05 | -0.55 | -73780.66 | -0.93 |
| Conservation Sequestration | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 34549.35 | 0.36 | 0 | 0 | 2797.03 | 0.06 | 37346.38 | 0.42 |

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 3544.05 | 0.02 |
| Fuel Consumption | 1686.2 | 0.01 |
| Grid Electricity Utilisation | 133.32 | 0 |
| Credit | | |
| Export of Grid Electricity | -708.85 | 0 |
| Sales of PKS | 0 | 0 |
| Sales of EFB | 0 | 0 |
| Total | 4654.72 | 0.03 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO₂e |
|--------------------------------|-------------------------|
| PK from own mill | 7490.25 |
| PK from other source | 24882.03 |
| Fuel Consumptions | 562.01 |
| Total Crusher emissions | 32934.28 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | 0 |
| Divert to anaerobic diversion (%) | 100 |

| POME Diverted to Anaerobic Digestion: | |
|--|----|
| Divert to anaerobic pond (%) | 0 |
| Divert to methane captured (flaring) (%) | 50 |
| Divert to methane captured (energy generation) (%) | 50 |

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The GHG emissions that were produced in **February 2018 – January 2019** for **Navo POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **February 2018 – January 2019** for **Navo POM** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.05 |
| PKO | 1.05 |

| Extraction | % |
|------------|-------|
| OER | 26.09 |
| KER | 6.14 |

| Production | t/yr |
|--------------|----------|
| FFB Process | 216809.2 |
| CPO Produced | 56558.87 |
| PKO Produced | 13304.19 |

| Land Use | Ha |
|-----------------------------|-----------------|
| OP Planted Area | 20826.84 |
| OP Planted on peat | 0 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 0 |
| Total | 20826.84 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 124850.45 | 0.63 | 0 | 0 | 24348.84 | 0.65 | 149199.29 | 1.28 |
| CO ₂ Emission from fertilizer | 4481.99 | 0.02 | 0 | 0 | 748.76 | 0.01 | 5230.75 | 0.03 |
| NO ₂ Emmision | 6968.01 | 0.03 | 0 | 0 | 965.63 | 0.01 | 7933.64 | 0.04 |
| Fuel Consumption | 2146.89 | 0.01 | 0 | 0 | 0 | 0 | 2146.89 | 0.01 |
| Peat Oxidation | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sink | | | | | | | | |
| Crop Sequestration | -72599.5 | -0.36 | 0 | 0 | -23079.47 | -0.62 | -95678.97 | -0.98 |
| Conservation Sequestration | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 65847.84 | 0.34 | 0 | 0 | 2983.76 | 0.05 | 68831.6 | 0.39 |

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 3544.05 | 0.02 |
| Fuel Consumption | 1218.44 | 0.01 |
| Grid Electricity Utilisation | 133.32 | 0 |
| Credit | | |
| Export of Grid Electricity | -708.85 | 0 |
| Sales of PKS | 0 | 0 |
| Sales of EFB | 0 | 0 |
| Total | 4186.96 | 0.02 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 13905.1 |
| PK from other source | 24882.03 |
| Fuel Consumptions | 4061.4 |
| Total Crusher emissions | 42848.52 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | 0 |
| Divert to anaerobic diversion (%) | 100 |

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

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

| 5.1 Applicability of the general chain of custody requirements for the supply chain | | | |
|--|---|---|--|
| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| 5.1.1 | The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification. | <p>Hargy Palm Oil Mill (POM), Barema POM and Navo POM are a certification unit under Hargy Oil Palms Limited. The parent company is SIPEF Group, Belgium. Hargy Oil Palms Limited takes legal ownership and physically handles RSPO certified FFB coming from certified supply base (Hargy Estate, Navo Estate and Pandi Estate) and processed into certified CPO and palm kernel.</p> <p>Hargy POM, Barema POM and Navo POM processing RSPO certified FFB into certified CPO and PK. The despatch of CPO via bulking station and a jetty managed and used exclusively by Hargy Oil Palms Limited.</p> <p>Trading, contracting and sales are managed by SIPEF Marketing Department, Antwerp, Belgium.</p> | Yes |
| 5.1.2 | Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model. | <p>Hargy Oil Palms Limited have a Marketing Agreement with SIPEF NV, dated 2 January 2018. In Annex 1 Description of the Tasks as Included in The Master File of The Group, stated SIPEF serves as the exclusive selling agent for the export sales of the plantations agricultural products.</p> <p>The Hargy POM, Barema POM and Navo POM under Hargy Oil Palms Limited are not a trader and/or distributor. Not applicable.</p> | N/A Not Applicable |
| 5.1.3 | Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform. | <p>Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005.</p> <p>Hargy POM PalmTrace ID: RSPO_PO10000 00053.</p> <p>Barema POM PalmTrace ID: RSPO_PO10000 01655.</p> <p>Navo POM PalmTrace ID: RSPO_PO10000 00105.</p> | Comply |

| | | | |
|-----------------------------------|--|---|-----------------------------------|
| 5.1.4 | Processing aids do not need to be included within an organization’s scope of certification. | There is no processing aid required. The certified unit is a palm oil mill. Not applicable. | N/A Not Applicable |
| 5.2 Supply chain model | | | |
| 5.2.1 | The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance. | <p>The organization follows the rules of supply chain model, using the same supply chain model as the supplying unit or go to less strict system. The downgrading in following order: Identity Preserved (IP) – Segregated (SG).</p> <p>This has been described clearly in the mill procedure, “HOPL RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01” dated 28 August 2019.</p> <p>Section 5.2 Supply Chain Model explains HOPL applies different supply chain models through its processes. Each of POM applied the requirements of Module D – CPO Mills Identity Preserved (IP) and products from these mills have IP status.</p> <p>Products from each POM are delivered to the bulking station at Hargy POM where they are mixed and the applicable module becomes Module B – Segregated (SG).</p> | Yes |
| 5.2.2 | The site can use one (1) or a combination of supply chain models as audited and certified by the CB. | <p>Hargy Oil Palms Limited, as for the certification scope: production of sustainable CPO and PK from Hargy POM, Barema POM, Navo POM with supply base from Hargy Estate, Navo Estate, Pandi Estate and smallholders – implemented RSPO P&C with RSPO SCCS for CPO Mills Module D - Identity Preserved.</p> <p>Audit team verified through records, field visit and interview, there is no non-certified FFB being processed in the mills, therefore it is not using RSPO SCCS for CPO Mills Module E – Mass Balance.</p> | Yes |
| 5.3. Documented Procedures | | | |

| | | | |
|--------------|---|--|------------|
| <p>5.3.1</p> | <p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. | <p>Hargy Oil Palms Limited has established set of Standard Operating Procedure to ensure the implementation of all elements of the RSPO Supply Chain Certification Standards in Hargy's Palm Oil Mills. The procedures have been updated in 21 May 2019. The procedures are:</p> <ul style="list-style-type: none"> - PRO-ESD-SCC-001-01, Receiving; - PRO-ESD-SCC-002-02, Production; - PRO-ESD-SCC-004-01, Non Conformity; - PRO-ESD-SCC-005-01, Outsourcing Activity; - PRO-ESD-SCC-006-01, Sales and Goods Out; - PRO-ESD-SCC-007-01, Receipt of Transaction; - PRO-ESD-SCC-008-01, Training; - PRO-ESD-SCC-009-01, Record Keeping; - PRO-ESD-SCC-010-01, Conversion Factors; - PRO-ESD-SCC-011-01, Claim; - PRO-ESD-SCC-012-01, Complaint; - PRO-ESD-SCC-013-01, Management Review. <p>HOPL also have a Supply Chain manual under MAN-COM-SCC-001-01, RSPO Supply Chain Certification Manual, dated 28 August 2019. The document mention on page 4 that Chief Executive Officer of HOPL has overall responsibility for and authority over the implementation of RSPO Supply Chain Certification and compliance with applicable requirements. This mean include inform client about termination or suspension within 3 business days from the day of termination or suspension.</p> <p>The supply chain procedure covers:</p> <ul style="list-style-type: none"> - General chain of custody requirements: Purchasing and Goods In, Outsourcing Activities, Sales and Goods Out, Registration of Transactions, Training, Record Keeping, Conversion Factors, Claims, Complaints, Management Review; - Module D Identity Preserved: Supply Chain Requirements, Processing; - Module F Multi Site: Definition, Explanation, Responsibilities Training, Record Keeping, Internal Audits, Claims | <p>Yes</p> |
|--------------|---|--|------------|

| | | | |
|--|--|--|--|
| | <ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). | <p>Verified in Barema POM: FFB receipt from Company owned plantation:</p> <ul style="list-style-type: none"> - FFB Receiving Slip #FFBIP19008479W, dated 02/09/2019, origin: Hargy Division Barema 1, Lorry VH12, Product: Fresh Fruit Bunche IP, DO 224396, Remarks S049/F14, Block 07E16; YOP 2007; ABW 18 kg: amount 387 bunches; nett weight 6.70 tons. - FFB Receiving Slip #FFBIP19003724W, dated 03/05/2019, origin: Navo Division Kiba 2, Lorry VH23, Product: Fresh Fruit Bunche IP, DO 177876, Remarks SK124/F12, Block 99E14; YOP 1999; ABW 30 kg: amount 540 bunches; nett weight 16.06 tons. <p>FFB receipt from smallholders: FFB docket No.001019-000823, from trip No.0095, FFB from smallholder in Wilelo area, division MaututuFG, dated 3 October 2019; weight 14,020 tons. HOPL-Barema POM weighbridge ticket No.FFBIP19009250W dated 3 October 2019; lorry No.VC12; FFB from smallholder Maututu division, year of planting 2000, docket No.038877 (17BD0265; 1,070 kg, Jim N, 1795, Soi), 038876 (17BD0115; 1,017 kg, Rubie, 1796, Soi), 038875 (17BCDC35; 1,253 kg, Andreas, 1797, Soi), 038874 (17BD-2D5; 1,534 kg, Carol, 1795, Soi), 038873 (17BCF861; 3.459 kg, Rutu S., 1786, Soi), 038870, 038872, 038873 (17BCE84B; 5,278 kg, Sogi G., 1786, Soi); trip No.0095; weight 13.76 tons. Daily production report (FFB to CPO and PK) Barema POM Daily Production Figure 28 September 2019, as reported on 29 September 2019: FFB IP stock before 102 tons; FFB received 578.28 tons; FFB processed 648.28 tons; stock carry forward 32 tons; processing hour 16.03 hours; mill throughput 40.44 tons; OER 25.03%; CPO produced 162.24 tons; KER 5.2%; PK produced 33.68 tons. CPO stocks before 674.81 tons; CPO dispatched 96.54 tons; CPO stock carry forward 740.51 tons; PK stock before 9.57 tons; PK dispatched 0; PK crushed 34 tons; PK stock carry forward 80.69 tons. Monthly progress report Report in Barema POM, 30 September 2019: FFB stock before 5,395.42 tons; FFB received from company plantation 7,831 tons; total FFB</p> | |
|--|--|--|--|

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| | | <p>processed 7,674.50 tons; OER 23.33%; CPO production 1,790.15 tons; KER 5.14%; Kernel Production 394.80 tons.</p> <p>Shipping sample CPO: Despatch Slip No.CPOIP19000839W dated 2 October 2019 from Barema POM to Hargy POM; product Crude Palm Oil IP; CPO weight 30.56 MT; DO No.BPOMHPOMCPOIP01; lorry VP09; driver Mr. Jonathan Pali.</p> <p>Barema-Hargy Oil Cartage Logsheet dated 2 October 2019; vehicle VP09; driver Mr. Jonathan Pali; CPO IP despatch from tank No.1; loading time 21.29-21.52; load weight 30.58 MT; product type CPO IP; receiver Hargy POM dated 2 October 2019.</p> <p>PKO: Despatch Slip No.CPKO19000157W dated 3 October 2019 from Barema POM to Hargy POM; product Crude Palm Kernel Oil SG; CPKO weight 32.44 MT; DO No.BROMHPOMCPKO01; lorry VP09; driver Johnathan Pali.</p> <p>Barema-Hargy Oil Cartage Logsheet dated 3 October 2019; vehicle VP09; driver Johnathan Pali; CPKO SG despatch from tank No.1; loading time 03.29-03.55; load weight 31.06 MT; product type CPKOSG; receiver Hargy POM dated 3 October 2019.</p> | |
| | <ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. | <p>Hargy Oil Palms Limited has RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01 dated 28 August 2019. In section 5.3 stated the Chief Executive Officer, Hargy Oil Palms Limited has overall responsibility for and the authority over the implementation of these requirements and a compliance with all applicable requirements. The Chief Executive Officer, supported by the General Manager of Compliance department and senior staff, are aware of the procedures for the implementation of this standard and ensure through management actions.</p> | |
| <p>5.3.2</p> | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> | <p>Hargy Oil Palms Limited has RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01 dated 28 August 2019. In section 5.3.2 has a written procedure to conduct an annual internal audit to verify the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communicatoins and</p> | |

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| | | <p>Claim Documents; ii) effectively implements and maintains the standard requirements within its organization.</p> | |
| | <p>ii) effectively implements and maintains the standard requirements within its organization</p> | <p>Hargy Oil Palms Limited have prepared the RSPO SCCS internal audit plan 2019. Planning for Hargy POM and Barema POM on March 2019; planning for Navo POM on June 2019.</p> <p>In Hargy POM, RSPO SCCS audit carried out on 7 March 2019, by Carol Aigilo and Florence Jicki. The Hargy POM & KCP weighbridge officer, QC and laboratory analyst, process superintendent, assistant operator, laboratory and shipping superintendent, and compliance officer participated the internal audit process. Supply Chain Certification Internal Audit was evident covering General chain of custody requirements for the supply chain, RSPO rules on market communication and claims, Module B and Module F requirements.</p> <p>In Barema POM, internal audit carried out on 5 March 2019 by Carol Aigilo and Florence Jicki. The weighbridge officer, mill engineer, environment officer, weighbridge attendant, laboratory superintendent, and mill manager attended the internal audit process. Non-conformities issued related to absence of 2019 training plan and no management review minutes of meeting; Corrective action plan: Non-conformance form No.19081 dated 5 March 2019 was issued. Verification carried out 30 July 2019; i) training plan for Barema POM has been updated 27 July 2019, ii) RSPO representative to do refresh training on SCCS on 5 July 2019 – closed out. Non-conformance form No.19082 dated 5 March 2019 was issued. Verification carried out 30 May 2019; i) copy of 2018 management review minutes made available on 30 May 2019 – closed out.</p> | <p>Yes</p> |
| <p>5.4. Purchasing and goods in</p> | | | |

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| 5.4.1 | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number | <p>Hargy Oil Palms Limited has established set of Standard Operating Procedure to ensure the implementation of all elements of the RSPO Supply Chain Certification Standards in Hargy's Palm Oil Mills. The procedures have been updated in 21 May 2019. The procedures are:</p> <ul style="list-style-type: none"> - PRO-ESD-SCC-001-01, Receiving; <p>Verified at FFB receipt from smallholders: FFB docket No.001019-000823, from trip No.0095, FFB from smallholder in Wilelo area, division MaututuFG, dated 3 October 2019. HOPL-Barema POM weighbridge ticket No.FFBIP19009250W dated 3 October 2019; lorry No.VC12; FFB from smallholder Maututu division, year of planting 2000, docket No.038877 (17BD0265; 1,070 kg, Jim N, 1795, Soi), 038876 (17BD0115; 1,017 kg, Rubie, 1796, Soi), 038875 (17BCDC35; 1,253 kg, Andreas, 1797, Soi), 038874 (17BD-2D5; 1,534 kg, Carol, 1795, Soi), 038873 (17BCF861; 3.459 kg, Rutu S., 1786, Soi), 038870, 038872, 038873 (17BCE84B; 5,278 kg, Sogi G., 1786, Soi); trip No.0095; weight 13.76 tons.</p> <ul style="list-style-type: none"> • The name and address of the buyer: Hargy Oil Palms Limited (Barema POM); • The name and address of the seller: the name of smallholders from Division Maututu, Wilelo; • The loading or shipment/delivery date: 3 October 2019; • The date on which the documents were issued: 3 October 2019; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): IP • The quantity of the products delivered: total 13.76 tons; • Any related transport documentation: from trip No.0095; • Supply Chain certificate number of the seller: RSPO 535739; • A unique identification number: FFB docket No.001019-000823; | Yes |
| | <ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil | <p>FFB IP Collection Docket, as a delivery note from plantation to the mill and each POM weighbridge ticket bears the information related to traceability along the supply chain, from plantation to POM.</p> | Yes |

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| | palm products (for example, delivery notes, shipping documents and specification documentation). | | |
| | <ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. | Based on interview with weighbridge operator, verification of certified product based on "FFB IP" notation in the FFB docket. Only FFB coming from certified supply base can have "FFB IP" notation. | Yes |
| | <ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. | The status of certification of the supply base shall be communicated to all areas of operation by Sustainability Manager including the period of certification invalidity of suspension. Hargy Oil Palms Limited only receiving FFB from the certified supply base, which has been RSPO certified, under the same company – Hargy Oil Palms Limited. The validity of Hargy Oil Palms RSPO P&C certificate 24 July 2015 – 23 July 2020. Sustainability also confirmed that no suspension status for Hargy Oil Palms Limited RSPO 535739 in the RSPO IT Platform. | Yes |
| | <ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. | Hargy Oil Palms Limited was not using traders and distributors. All inputs are receipt directly from the farm. All of sales made directly to the buyer (POM). Not applicable. | Not Applicable N/A |
| 5.4.2 | The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. | HOPL have a mechanism in place for handling non-conforming oil palm products and/or documents under Non-Conformance Procedure No.PRO-ESD-SCC-004-01 dated 21 May 2019. The circumstances of the nonconformance will be fully investigated and resolution will be determined. Resolution may be by correcting the documentation if investigation find s that the oil palm product is compliant but the related documentation was deficient. In the event that the product is deficient, the subject product is to be discarded. Based on audit, there are no non-conforming products and/or documents coming to the Hargy POMs. | Yes |
| 5.5. Outsourcing activities | | | |

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| 5.5.1 | <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p> | <p>Hargy Oil Palms Limited has procedure PRO-ESD-SCC-005-01, Outsourcing Activity to regulate the outsourcing activity. Hargy Oil Palms Limited performs outsourcing activities for FFB transport, when the CH have legal ownership of the material (FFB).</p> | Yes |
| 5.5.2 | <p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p> | <p>Hargy Oil Palms Limited performs outsourcing activities for FFB transport, when the CH have legal ownership of the material (FFB).</p> | Yes |
| | <p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> | <p>Contract with FFB transport contractor: Contract Kijomhal Transport T/A Kijomhal Transport, Vehicle Rego No.RAL674 & KAG796 for Smallholders FFB Cartage Service between Hargy Oil Palms Limited and Kijomhal Transport, sign date 1 August 2019 and ends 31 December 2019 for delivery contract. Point 13 of contract stipulates Contractors shall comply with the relevant requirements of RSPO Supply Chain Certification Standard & RSPO Principle and Criteria; The contractor shall provide relevant access for duly accredited certification bodies (CBs) to their respective operations, systems and other information; when deemed necessary.</p> | Yes |

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| | <p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> | <p>Hargy Oil Palms Limited has procedure PRO-ESD-SCC-005-01, Outsourcing Activity to regulate the outsourcing activity. Hargy Oil Palms Limited performs outsourcing activities for FFB transport, when the CH have legal ownership of the material (FFB).</p> | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | |
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| | <p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p> | <p>Contract with FFB transport contractor: Contract Kijomhal Transport T/A Kijomhal Transport, Vehicle Rego No.RAL674 & KAG796 for Smallholders FFB Cartage Service between Hargy Oil Palms Limited and Kijomhal Transport, sign date 1 August 2019 and ends 31 December 2019 for delivery contract. Point 13 of contract stipulates Contractors shall comply with the relevant requirements of RSPO Supply Chain Certification Standard & RSPO Principle and Criteria; The contractor shall provide relevant access for duly accredited certification bodies (CBs) to their respective operations, systems and other information; when deemed necessary. Hargy Oil Palms Limited provided Contractor Induction Agreement to Kijomhal Transport on 26 May 2017. The induction related to HOPL Environment, OHS Policy, EMS Policy and RSPO requirements.</p> | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>5.5.3</p> | <p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p> | <p>Name and contact details of trucking contractor:</p> <table border="1" data-bbox="1153 885 1904 1244"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Contact Number/Address</th> </tr> </thead> <tbody> <tr> <td>Ngepieng Trading</td> <td>Andrew Lare</td> <td>PO BOX 21, Bialla 624</td> </tr> <tr> <td>Liwale Nane Building and Maintenance</td> <td>Kiru Dariako</td> <td>PO BOX 78, Bialla</td> </tr> <tr> <td>Membu Welding & Construction Limited</td> <td>Erick Wali</td> <td>PO BOX 231, Bialla 624</td> </tr> <tr> <td>Suaville Investment Ltd</td> <td>Clement Bonny</td> <td>PO BOX 468, Kimbe</td> </tr> <tr> <td>Kijomhal Transport</td> <td>Allan Zairere</td> <td>705***16</td> </tr> <tr> <td>Alaba Development Inc.</td> <td>Nixon Volele</td> <td>PO BOX 172, Bialla 624</td> </tr> <tr> <td>Gilo Estate of Painave Village</td> <td>Willie Nantoto</td> <td>PO BOX 223, Bialla 624</td> </tr> </tbody> </table> <p>Name and contact details of shipping company: Paradise Shipping & Logistics Limited, PO BOX 3580, Lae – Morobe Province, Papua New Guinea. Contact Person: Mr. Joe Auteke. Contact No.793***48.</p> | Contractor | Contact Person | Contact Number/Address | Ngepieng Trading | Andrew Lare | PO BOX 21, Bialla 624 | Liwale Nane Building and Maintenance | Kiru Dariako | PO BOX 78, Bialla | Membu Welding & Construction Limited | Erick Wali | PO BOX 231, Bialla 624 | Suaville Investment Ltd | Clement Bonny | PO BOX 468, Kimbe | Kijomhal Transport | Allan Zairere | 705***16 | Alaba Development Inc. | Nixon Volele | PO BOX 172, Bialla 624 | Gilo Estate of Painave Village | Willie Nantoto | PO BOX 223, Bialla 624 | <p>Yes</p> |
| Contractor | Contact Person | Contact Number/Address | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ngepieng Trading | Andrew Lare | PO BOX 21, Bialla 624 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Liwale Nane Building and Maintenance | Kiru Dariako | PO BOX 78, Bialla | | | | | | | | | | | | | | | | | | | | | | | | | |
| Membu Welding & Construction Limited | Erick Wali | PO BOX 231, Bialla 624 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Suaville Investment Ltd | Clement Bonny | PO BOX 468, Kimbe | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kijomhal Transport | Allan Zairere | 705***16 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Alaba Development Inc. | Nixon Volele | PO BOX 172, Bialla 624 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gilo Estate of Painave Village | Willie Nantoto | PO BOX 223, Bialla 624 | | | | | | | | | | | | | | | | | | | | | | | | | |

| 5.5.4 | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products. | <p>Name and contact details of trucking contractor:</p> <table border="1" data-bbox="1153 391 1906 746"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Contact Number/Address</th> </tr> </thead> <tbody> <tr> <td>Ngepieng Trading</td> <td>Andrew Lare</td> <td>PO BOX 21, Bialla 624</td> </tr> <tr> <td>Liwale Nane Building and Maintenance</td> <td>Kiru Dariako</td> <td>PO BOX 78, Bialla</td> </tr> <tr> <td>Membu Welding & Construction Limited</td> <td>Erick Wali</td> <td>PO BOX 231, Bialla 624</td> </tr> <tr> <td>Suaville Investment Ltd</td> <td>Clement Bonny</td> <td>PO BOX 468, Kimbe</td> </tr> <tr> <td>Kijomhal Transport</td> <td>Allan Zairere</td> <td>705***16</td> </tr> <tr> <td>Alaba Development Inc.</td> <td>Nixon Volele</td> <td>PO BOX 172, Bialla 624</td> </tr> <tr> <td>Gilo Estate of Painave Village</td> <td>Willie Nantoto</td> <td>PO BOX 223, Bialla 624</td> </tr> </tbody> </table> <p>Name and contact details of shipping company: Paradise Shipping & Logistics Limited, PO BOX 3580, Lae – Morobe Province, Papua New Guinea. Contact Person: Mr. Joe Auteke. Contact No.793****48.</p> | Contractor | Contact Person | Contact Number/Address | Ngepieng Trading | Andrew Lare | PO BOX 21, Bialla 624 | Liwale Nane Building and Maintenance | Kiru Dariako | PO BOX 78, Bialla | Membu Welding & Construction Limited | Erick Wali | PO BOX 231, Bialla 624 | Suaville Investment Ltd | Clement Bonny | PO BOX 468, Kimbe | Kijomhal Transport | Allan Zairere | 705***16 | Alaba Development Inc. | Nixon Volele | PO BOX 172, Bialla 624 | Gilo Estate of Painave Village | Willie Nantoto | PO BOX 223, Bialla 624 | Yes |
|--------------------------------------|--|--|------------|----------------|------------------------|------------------|-------------|-----------------------|--------------------------------------|--------------|-------------------|--------------------------------------|------------|------------------------|-------------------------|---------------|-------------------|--------------------|---------------|----------|------------------------|--------------|------------------------|--------------------------------|----------------|------------------------|-----|
| Contractor | Contact Person | Contact Number/Address | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ngepieng Trading | Andrew Lare | PO BOX 21, Bialla 624 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Liwale Nane Building and Maintenance | Kiru Dariako | PO BOX 78, Bialla | | | | | | | | | | | | | | | | | | | | | | | | | |
| Membu Welding & Construction Limited | Erick Wali | PO BOX 231, Bialla 624 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Suaville Investment Ltd | Clement Bonny | PO BOX 468, Kimbe | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kijomhal Transport | Allan Zairere | 705***16 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Alaba Development Inc. | Nixon Volele | PO BOX 172, Bialla 624 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gilo Estate of Painave Village | Willie Nantoto | PO BOX 223, Bialla 624 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.6. Sales and goods out | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.6.1 | <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; | <p>There are a number of buyer: C***** B.*. Refined Oils Europe No.RSPO_PO1000000031; membership No.2-0215-11-000-00 F*** O*** Europe No.RSPO_PO1000000077; membership No.2-0009-04-000-00. B**** L***** C***** BV No.RSPO_PO1000000055; membership No.2-0066-07-000-00. H**** KCP No.RSPO_PO1000002567</p> <p>Hargy POM: Sales of CPO under PalmTrace transaction No.TR-d65ad88-cfbe: - Contract No.PHO-10493 dated 18 December 2018. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 1,000 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21 Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF –</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | |

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| | <ul style="list-style-type: none"> Supply chain certificate number of the seller; A unique identification number | <p>Antwerp; End Buyer: C***** B*; Buyer Address: NL-1118 CZ Schiphol, The Netherland.</p> <ul style="list-style-type: none"> Tanker Bill of Lading No.BIA/ROT-01, dated 8 March 2019. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: C***** B* Croe Inbound, Evert van de Beekstraat 378, NL-2311 CZ, Schiphol. Tanker: MT Stena Imprimis. Voyage: V1902. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 1,002.76 MT. Contract No.PHO-10493 SG. Shipping Announcement No.TR-d65ad88-cfbc. Date 12 March 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oil Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 1,002.76 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> The name and address of the buyer: C***** B.*. Refined Oils Europe; The name and address of the seller: Hargy Oil Palms Limited; The loading or shipment/ delivery date: 8 March 2019; The date on which the documents were issued: 8 March 2019; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG RSPO; The quantity of the products delivered: 1,002.76 MT; Any related transport documentation: Bill of Lading No.BIA/ROT-01 dated 8 March 2019; Supply chain certificate number of the seller: RSPO535739; A unique identification number: Contract No.PHO-10493 SG; <p>Barema POM: Sales of CPO under PalmTrace transaction No.TR-f5c8a4f4-e93f: - Contract No.PHO-10490 dated 12 December 2018. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 500 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21</p> | |
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| | | <p>Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF NV; End Buyer: C***** B.*. Buyer Address: NL-1118 CZ Schiphol.</p> <ul style="list-style-type: none"> - Tanker Bill of Lading No.BIA/ROT-01, dated 26 May 2019. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: C***** B* Croe Inbound, Evert van de Beekstraat 378, NL-2311 CZ, Schiphol. Tanker: MT Philonexia. Voyage: V1901. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 500 MT. Contract No.PHO-10490 SG. - Shipping Announcement No. TR-f5c8a4f4-e93f. Date 28 May 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oil Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 500 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: C***** B.*. Refined Oils Europe; • The name and address of the seller: Hargy Oil Palms Limited; • The loading or shipment/ delivery date: 26 May 2019; • The date on which the documents were issued: 26 May 2019; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG RSPO; • The quantity of the products delivered: 500 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-01 dated 26 May 2019; • Supply chain certificate number of the seller: RSPO535739; • A unique identification number: Contract No.PHO-10490; <p>Navo POM: Sales of CPO under PalmTrace transaction No.TR-a79b5923-620a:</p> <ul style="list-style-type: none"> - Contract No.PHO-10489 dated 12 December 2018. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 500 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21 | |
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| | | <p>Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF NV; End Buyer: C***** B*. Buyer Address: NL-1118 CZ Schiphol.</p> <ul style="list-style-type: none"> - Tanker Bill of Lading No.BIA/ROT-01, dated 28 April 2019. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: C***** B* Croe Inbound, Evert van de Beekstraat 378, NL-2311 CZ, Schiphol. Tanker: MT Atlantic Guard. Voyage: V1901. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 500 MT. Contract No.PHO-10489 SG. - Shipping Announcement No. TR-f5c8a4f4-e93f. Date 30 April 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oils Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 500 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: C***** B*. Refined Oils Europe; • The name and address of the seller: Hargy Oil Palms Limited; • The loading or shipment/ delivery date: 28 April 2019; • The date on which the documents were issued: 28 April 2019; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG RSPO; • The quantity of the products delivered: 500 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-01 dated 28 April 2019; • Supply chain certificate number of the seller: RSPO535739; A unique identification number: Contract No.PHO-10489 SG; | |
| | <ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | <p>These information provided in different records:</p> <ul style="list-style-type: none"> - Contract; - Tanker Bill of Lading; - Loading Sequence; Shipping Announcement; | <p>Yes</p> |

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| | <ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. | <p>Hargy POM: Sales of CPO under PalmTrace transaction No.TR-d65ad88-cf8e: - Shipping Announcement No.TR-d65ad88-cf8e. Date 12 March 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oils Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 1,002.76 MT.</p> <p>Barema POM: Sales of CPO under PalmTrace transaction No.TR-f5c8a4f4-e93f: - Shipping Announcement No. TR-f5c8a4f4-e93f. Date 28 May 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oils Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 500 MT.</p> <p>Navo POM: Sales of CPO under PalmTrace transaction No.TR-a79b5923-620a: - Shipping Announcement No. TR-f5c8a4f4-e93f. Date 30 April 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oils Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 500 MT.</p> | <p>Yes</p> |
| <p>5.7. Registration of transactions</p> | | | |
| <p>5.7.1</p> | <p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. | <p>Hargy Oil Palms Limited have registered all of their POM into RSPO PalmTrace. Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005. Hargy POM PalmTrace ID: RSPO_PO10000 00053. Barema POM PalmTrace ID: RSPO_PO10000 01655. Navo POM PalmTrace ID: RSPO_PO10000 00105.</p> | <p>Yes</p> |

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| 5.7.2 | <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. | <p>Hargy POM: Sales of CPO under PalmTrace transaction No.TR-d65ad88-cfbc: - Shipping Announcement No.TR-d65ad88-cfbc. Date 12 March 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oils Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 1,002.76 MT.</p> <p>Barema POM: Sales of CPO under PalmTrace transaction No.TR-f5c8a4f4-e93f: - Shipping Announcement No. TR-f5c8a4f4-e93f. Date 28 May 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oils Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 500 MT.</p> <p>Navo POM: Sales of CPO under PalmTrace transaction No.TR-a79b5923-620a: - Shipping Announcement No. TR-f5c8a4f4-e93f. Date 30 April 2019. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: C***** B* Refined Oils Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 500 MT.</p> | Yes |
| | <ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. | <p>Hargy Oil Palms Limited is producing sustainable CPO and PK. The RSPO P&C certification scope does not go beyond refinery. Not applicable.</p> | Not Applicable N/A |
| | <ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. | <p>Hargy Oil Palms Limited does not remove RSPO certified volume because: - All of the CPO and PK sold are RSPO certified; - The volume of CPO and PK sold based on buyer's weighing calculation;</p> | Not Applicable N/A |

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| | | - There are no CPO and/or PK product sold under other scheme or as conventional. Not applicable. | |
| | <ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. | Hargy Oil Palms Limited is producing sustainable CPO and PK. The RSPO P&C certification scope does not go beyond refinery. Not applicable. | Not Applicable N/A |
| 5.8. Training | | | |
| 5.8.1 | The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff. | Hargy Oil Palms Limited have prepared training plan for RSPO SCCS in June and December 2019 for Hargy POM, Barema POM and Navo POM. Training titled RSPO SCCS Refresher Training in Barema POM, planned for 28 June 2019 and 28 December 2019. Training titled RSPO SCCS Refresher Training in Hargy POM, planned for 28 June 2019 and 28 December 2019. Training titled RSPO SCCS Refresher Training in Navo POM, planned for 28 June 2019 and 28 December 2019. | Yes |
| 5.8.2 | Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed. | Training have been provided for all personnel involved in the RSPO SCCS implementation in Hargy Oil Palms Limited. In Barema POM: RSPO Supply Chain Standards training provided for Mr. Michael Naure (Electrical representative), Ezekiel Pais (weighbridge clerk), Stanton Meingo (KCP Supervisor), Richard Karrek (Laboratory Analyst), Sapak Papah (QC Lab Supervisor), Rosalyne M. (weighridge clerk), Agnes Nintui (Admin. clerk), Lormah Galgal (Payroll clerk) on 5 July 2019. Trainer Mr. Thomas Tade. In Navo POM: RSPO Supply Chain Standards training dated 24 June 2019, provided for Cletus Wekako (QC Supervisor), Gerard (Divisional Manager Smallholder), Serah bakut (RSPO representative Smallholder), Billy Werake (Transport Clerk – Pandi Estate) and other 17 employees. Training for RSPO SCCS “Identifying Certified FFB ad Uncertified FFB” in Navo POM including Christa Banovo (Weighbridge clerk), Peter Kavale (Laboratory Supervisor), Blaise Tongove (Demin Plant Operator), John Paul Bau, Harrison M (FFB Grader) – dated 7 May 2019. | Yes |

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| | | <p>In Hargy POM: Training record (for Mill Manager, Sustainability Officer, laboratory superintendent, weighbridge clerk, truck driver, smallholder officer).</p> <ul style="list-style-type: none"> - Supply Chain Certification Standard RSPO training on 24 June 2019, facilitated by Murray Feddersen, attended by Carol Aigilo (Sustainability Officer), Daniel Kanamare (Mill Manager NPOM), Leila Lepakot (Supt Lab/Shipping HPOM) Samson Cloe (RSPO Supv NPOM), Cletus Wekkiko (QC Supv-NPOM), Murray (Mill Manager HPOM), Serah Bakut (RSPO Rep Smallholders), Spak Papah (QC Lab Supv). <p>Refresher Session Supply Chain on 24 July 2019, facilitated by Leila Lepakot, attended by Eddy Solomon (Weighbridge Clerk), Joel Temon (Weighbridge Clerk), Darius Robin (FFB Grader).</p> | |
| 5.9. Record Keeping | | | |
| 5.9.1 | <p>The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.</p> | <p>Hargy Oil Palms Limited can demonstrate that all record and report are maintained accuracy, completeness and up-to-date. Sample seen:</p> <ul style="list-style-type: none"> - Daily Production Figure for 30 September 2019 as reported on 1 October 2019, mentioned that PK Stock before 95.19 tons; PK produced by Hargy POM 17.75 tons; PK crushed 22.10 tons; PK Stock carry forward 90.84 tons. CPKO stock before 578.44 tons; Dispatched 0; produced 8.47 tons; stock carry forward 586.92 tons; PKOER to FFB 2.5%; PKOER to PK 38.33%. CPKO production quality: PKO FFA 0.63%; PKO moisture 0.11; impurities 0.01. - Quarterly Balance Report period July to September 2019 evident. | Yes |
| 5.9.2 | <p>Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> | <p>"HOPL RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01 dated 28 August 2019". In section 5.9.1 Record Keeping stated retention times for all records and reports is a minimum of two (2) years and complies with legal and regulatory requirements. The records confirm the certified status of raw materials or products held in stock.</p> <p>Based on record review in Hargy POM, Barema POM and Navo POM: FFB delivery docket, weighbridge ticket, CPO dispatch slip, PK dispatch slip, daily production report from 2017 and 2018 can be retrieved. Sample sighted:</p> | Yes |

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| | | Barema POM FFB receiving slip No.FFBIP17014594W dated 29 December 2017 from Navo Estate, Karla3 Division, block F13 99D19, planting year 1999, FFB IP weighed 13,680 MT. | |
| 5.9.3 | The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. | Hargy Oil Palms Limited be able to demonstrate estimate volume of palm oil content in the RSPO certified oil palm product an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. Record sighted and verified: Monthly Progress Report August 2018 – September 2018. | Yes |
| 5.10. Conversion factors | | | |
| 5.10.1 | Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. | "Hargy Oil Palms Limited RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01 dated 28 August 2019. In section 5.10 Conversion Factors stated Hargy Oil Palms Limited has determined and sets its own conversion rates which must be based upon past experience, document and applied consistently. Conversion rates are periodically updated to ensure accuracy against actual performance or industry average if appropriate. | Yes |
| 5.10.2 | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | Sampled in Barema POM; Storage tank logbook by Laboratory QC: dated 29 September 2019: CPO Tank No.2 ullage record 2,398 m ³ ; CPKO Tank ullage record 3,836 m ³ ; | Yes |
| 5.11. Claims | | | |
| 5.11.1 | The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims. | Sample of document verified, Daily Production Figure, Weighbridge Card, Sales Contract and Tanker Bill of Lading demonstrated that the palm oil product delivered are RSPO certified model Segregation (SG) as displayed in the records, there is no RSPO corporate logo or Trade Mark logo displayed in those documents. Hargy Oil Palms Limited has aware and comply with the RSPO Rules on Market Communication and Claims. | Yes |
| General corporate communications | | | |

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| 4.1 | <p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p> | <p>SIPEF Group in its website: a. Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. b. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO". d. State the member's history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. e. Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website.</p> | Yes |
| 4.2 | <p>In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p> | <p>No, SIPEF did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p> | Yes |
| 4.3 | <p>In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p> | <p>No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF's own products.</p> | Yes |
| 4.4 | <p>Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.</p> | <p>No, SIPEF did not display its RSPO Corporate Logo.</p> | Yes |

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| 4.5 | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat. | <p>SIPEF Group in its website:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. b. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO". d. State the member's history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. e. Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website. | Yes |
| Business to business communications | | | |
| 5.1 | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products. | Hargy Oil Palms Limited-Kernel Crushing Plant stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. Hargy Oil Palms Limited is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. | Yes |
| 5.2 | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | Hargy Oil Palms Limited-Kernel Crushing Plant stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. Hargy Oil Palms Limited is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved system. During sales of CSPO and CSPK, Hargy Oil Palms made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between CH's palm oil mills. | Yes |
| 5.3 | Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: f. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking | Hargy Oil Palms Limited-Kernel Crushing Plant is not a distributor and/or wholesaler. Not applicable. | Not Applicable N/A |

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| | <p>the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>g. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p> | | |
| 5.4 | <p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p> | Hargy Oil Palms Limited-Kernel Crushing Plant produced and sold CSPKO in bulk. The contract, delivery order and Bill of Lading expressing RSPO certification. No on-product labelling. | Yes |
| Business to consumer communication | | | |
| 6.1 | <p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.</p> | Hargy Oil Palms Limited is certified RSPO P&C. Not applicable. | Yes |
| 6.2 | <p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p> | Hargy Oil Palms Limited is certified RSPO P&C. The CSPO and CSPK are sold physically. Hargy Oil Palms Limited do not use of RSPO Credit. There is no use of RSPO trademark for the CSPO and CSPK. Not applicable. | Not Applicable N/A |
| 6.3 | <p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p> | Hargy Oil Palms Limited is certified RSPO P&C, selling CSPO and CSPK. No on-pack claims or use of RSPO trademark on RSPO-certified sustainable oil palm products are used. Not applicable. | Not Applicable N/A |

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| 6.4 | Business to consumer communication shall not include information about the claimant's RSPO membership status. | Hargy Oil Palms Limited is certified RSPO P&C, selling CSPO and CSPK. There is no business to consumer communication about SIPEF Group's RSPO membership status. | Not Applicable N/A |
| 6.5 | Members shall not communicate to consumers information about their suppliers' RSPO membership status. | Hargy Oil Palms Limited is certified RSPO P&C, selling CSPO and CSPK. Hargy Oil Palms Limited and the parent compant - SIPEF Group did not make any communication about their supplier's RSPO membership status. Not applicable. | Not Applicable N/A |
| 6.6 | Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient. | Hargy Oil Palms Limited is certified RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product. | Yes |
| 6.7 | Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim. | There is no use of other trademark on product for CSPO and CSPK. | Not Applicable N/A |
| 6.8 | RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org . | Hargy Oil Palms Limited, member of SIPEF Group is not a retailer or food service company. Not applicable. | Not Applicable N/A |

| MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES | | | |
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| Certified oil palm content (IP) | | | |
| | For IP, 95% or above of the oil palm content must be RSPO IP-certified. | Hargy Oil Palms Limited is certified RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product. However, Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill). | Yes |
| | For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP. | Hargy Oil Palms Limited is certified RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product. However, Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill). | Yes |
| | Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume. | Hargy Oil Palms Limited is certified RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product. | Yes |
| Labelling and trademark (IP) | | | |
| | Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. | There was no on product label claims for the certification of Hargy palm oil mills. | Yes |
| Messaging (IP) | | | |

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| | <p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. | <p>There was no on product label claims for the certification of Hargy palm oil mills.</p> | <p>Yes</p> |
| <p>5.12. Complaints</p> | | | |
| <p>5.12.1</p> | <p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p> | <p>"Hargy Oil Palms Limited RSPO Supply Chain Certificate Manual No.MAN-COM-SCC-001-01 dated 28 August 2019". Section 5.12 Complaints stated Hargy has in place and maintains a documented procedure for collecting and resolving stakeholder complaints. This is done through Company's grievance procedure.</p> <p>Based on interview with GM Engineering and CEO Hargy Oil Palms Limited, there have been no complaint.</p> | <p>Yes</p> |
| <p>5.13. Management Review</p> | | | |
| <p>5.13.1</p> | <p>The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.</p> | <p>"Hargy Oil Palms Limited RSPO Supply Chain Certificate Manual No.MAN-COM-SCC-001-01 dated 28 August 2019". Section 5.13 Management Review: It is stated the management review annually at</p> | <p>Yes</p> |

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| | | <p>planned intervals, intergrated with ISO management review and follow an established agenda.</p> <p>Hargy Oil Palms Limited have conducted the "2018 Management Review of Supply Chain Certification Standard – Hargy Oil Palms Limited (HOPL)", dated 28 February 2019. The management review attended by vehicle workshop manager, smallholders manager, chief engineer, head of plantations, stores manager, finance manager, company lawyer, internal audit manager, environment & sustainability manager, HR manager. The general manager attends to review the process.</p> | |
| 5.13.2 | <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. | <p>The management review input, as recorded in minutes of management review meeting dated 28 February 2019:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard: 2 internal audits covering RSPO Supply Chain Certification Standard: 2 internal audits carried out for 2018 and another internal audit planned for on March 2019. Two nonconformances were raised in the RSPO SCCS external audit, both NCs were closed off and certification retained. Internal audit for Barema POM in 5 March 2019, with 7 non-conformities issued. • Customer feedback: No complaint received. • Status of preventive and corrective actions: internal audits carried out on 23-25 May 2017 ad 13-17 November 2017 with 10 non-conformities issued. All non-conformities have been closed. Internal audit for Hargy POM in 5 March 2018, with 3 non-conformities issued; 2 findings have been closed out effectively. Internal audit for Barema POM in 5 March 2019, with 7 non-conformities issued; 2 findings have been closed out effectively. • Follow-up actions from management reviews: No outstanding actions from the last management review meeting. • Changes that could affect the management system: No changes made that would have some impact on the supply chain management system. • Recommendations for improvement: training/awareness & competency of staff directly involved in activities dealing with movement of FFB/LF between the supply base and the mills; | Yes |

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| | | improve the internal audit nonconformance closeout, to maintain integrity of the current system; awareness of Supply Chain SOPs. | |
| 5.13.3 | The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> Improvement of the effectiveness of the management system and its processes. Resource needs. | The management review input, as recorded in minutes of management review meeting dated 28 February 2019: <ul style="list-style-type: none"> Improvement of the effectiveness of the management system and its processes: improve the internal audit nonconformance closeout, to maintain integrity of the current system. Resources needs: the Hargy Oil Palms Limited is committed to continue provision of adequate and relevant resources for the implementation, maintenance and improvement of RSPO SCCS requirement. | Yes |

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

| D.1 Definition | | | |
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| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| D.1.1 | A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable. | Hargy POM is implementing Module D for CPO Mills: Identity Preserved. Hargy POM only receiving certified FFB from company owned plantation: Hargy Plantation, Navo Plantation and Pandi Plantation; as well as from certified associated smallholders. | Yes |
| D.2 Explanation | | | |

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| 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. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | The estimated annual tonnage for certified FFB processed, CPO and PK production are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases (company-owned plantation and associated smallholders). The estimated for CPO and PK production from Hargy POM, Barema POM and Navo POM is recorded under the public summary report and the RSPO certificate for Hargy Oil Palms Limited. The actual CPO and PK production were verified during each subsequent annual surveillance assessment visit to ensure that certified mill only deliver the allowed tonnage for the year. BSI Group as certification body has submitted estimated of FFB received, CPO and PK produced to RSPO Public Summary Report and the RSPO PalmTrace system. | Yes |
| 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). | Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005. Hargy POM PalmTrace ID: RSPO_PO10000 00053. Barema POM PalmTrace ID: RSPO_PO10000 01655. Navo POM PalmTrace ID: RSPO_PO10000 00105. | Yes |
| D.3 Documented procedures | | | |
| 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: a. Complete and up to date procedures covering the implementation of all the elements in these requirements; | Hargy Oil Palms Limited has established set of Standard Operating Procedure to ensure the implementation of all elements of the RSPO Supply Chain Certification Standards in Hargy’s Palm Oil Mills. The procedures have been updated in 21 May 2019. The procedures are: - PRO-ESD-SCC-001-01, Receiving; - PRO-ESD-SCC-002-02, Production; - PRO-ESD-SCC-004-01, Non Conformity; - PRO-ESD-SCC-005-01, Outsourcing Activity; - PRO-ESD-SCC-006-01, Sales and Goods Out; - PRO-ESD-SCC-007-01, Receipt of Transaction; - PRO-ESD-SCC-008-01, Training; - PRO-ESD-SCC-009-01, Record Keeping; | Yes |

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| | | <ul style="list-style-type: none"> - PRO-ESD-SCC-010-01, Conversion Factors; - PRO-ESD-SCC-011-01, Claim; - PRO-ESD-SCC-012-01, Complaint; - PRO-ESD-SCC-013-01, Management Review. <p>HOPL also have a Supply Chain manual under MAN-COM-SCC-001-01, RSPO Supply Chain Certification Manual, dated 28 August 2019. The document mention on page 4 that Chief Executive Officer of HOPL has overall responsibility for and authority over the implementation of RSPO Supply Chain Certification and compliance with applicable requirements. This mean include inform client about termination or suspension within 3 business days from the day of termination or suspension.</p> <p>The supply chain procedure covers:</p> <ul style="list-style-type: none"> - General chain of custody requirements: Purchasing and Goods In, Outsourcing Activities, Sales and Goods Out, Registration of Transactions, Training, Record Keeping, Conversion Factors, Claims, Complaints, Management Review; - Module D Identity Preserved: Supply Chain Requirements, Processing; | |
| | 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. | Hargy Oil Palms Limited has RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01 dated 28 August 2019. In section 5.3 stated the Chief Executive Officer, Hargy Oil Palms Limited has overall responsibility for and the authority over the implementation of these requirements and acompliance with all applicable requirements. The Chief Executive Officer, supported by the General Manager of Compliance department and senior staff, are aware of the procedures for the implementation of this standard and ensure through management actions. | Yes |
| D.3.2 | The site shall have documented procedures for receiving and processing certified FFBS. | Hargy Oil Palms Limited has established set of Standard Operating Procedure to ensure the implementation of all elements of the RSPO Supply Chain Certification Standards in Hargy's Palm Oil Mills. The procedures have been updated in 21 May 2019. The procedures are: <ul style="list-style-type: none"> - PRO-ESD-SCC-001-01, Receiving; | Yes |

| | | | |
|------------------------------------|--|--|-----|
| | | - PRO-ESD-SCC-009-01, Record Keeping; This procedure is implemented. | |
| D.4 Purchasing and goods in | | | |
| D.4.1 | The site shall verify and document the tonnage and sources of certified FFBs received. | <p>Hargy POM only received FFB from certified supply base, whereby consist of company owned plantation: Hargy Estate, Barema Estate, Navo Estate; as well as the smallholders.</p> <p>Hargy Oil Palms Limited, through the smallholder office and community affairs work together with OPIC to identify smallholder meets RSPO P&C requirements. Community affairs and Smallholder Department are consistent in suspending smallholder that's not meeting RSPO P&C requirements. Hargy Oil Palms issued a memorandum to stop picking up FFB/crop from a number of non-conforming smallholders. These steps are taken to prevent non-conforming material (FFB) entering HOPL's process.</p> <p>Based on this audit, all FFB sources are certified and there is no non-certified FFB sources entering Hargy Palm Oil Mill's process. At the weighbridge, the docket is generated which gives the weight, origin from the plantation. IP (Identity Preserved) is printed on docket indicating the FFB received certified under IP/Identity Preserved Module.</p> <p>Based on interview with weighbridge operators, they understood currently receiving FFB from company-owned plantation as certified supply base to be eligible for supply chain module Identity Preserved.</p> <p>Verified report in Barema POM: FFB receipt from Company owned plantation:</p> <ul style="list-style-type: none"> - FFB Receiving Slip #FFBIP19008479W, dated 02/09/2019, origin: Hargy Division Barema 1, Lorry VH12, Product: Fresh Fruit Bunches IP, DO 224396, Remarks S049/F14, Block 07E16; YOP 2007; ABW 18 kg: amount 387 bunches; nett weight 6.70 tons. - FFB Receiving Slip #FFBIP19003724W, dated 03/05/2019, origin: Navo Division Kiba 2, Lorry VH23, Product: Fresh Fruit Bunche IP, | Yes |

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|---------------------------|---|--|-----|
| | | <p>DO 177876, Remarks SK124/F12, Block 99E14; YOP 1999; ABW 30 kg: amount 540 bunches; nett weight 16.06 tons.</p> <p>FFB receipt from smallholders: FFB docket No.001019-000823, from trip No.0095, FFB from smallholder in Wilelo area, division MaututuFG, dated 3 October 2019; weight 14,020 tons.</p> <p>HOPL-Barema POM weighbridge ticket No.FFBIP19009250W dated 3 October 2019; lorry No.VC12; FFB from smallholder Maututu division, year of planting 2000, docket No.038877 (17BD0265; 1,070 kg, Jim N, 1795, Soi), 038876 (17BD0115; 1,017 kg, Rubie, 1796, Soi), 038875 (17BCDC35; 1,253 kg, Andreas, 1797, Soi), 038874 (17BD-2D5; 1,534 kg, Carol, 1795, Soi), 038873 (17BCF861; 3.459 kg, Rutu S., 1786, Soi), 038870, 038872, 038873 (17BCE84B; 5,278 kg, Sogi G., 1786, Soi); trip No.0095; weight 13.76 tons.</p> | |
| D.4.2 | The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. | Supply Chain manual under MAN-COM-SCC-001-01, RSPO Supply Chain Certification Manual, dated 28 August 2019 section Responsibilities: Chief Executive Officer is the designated management representative, has overall responsibility for and authority over the implementations of all requirements of supply chain standard – Module D Identity Preserved, notifies the CB should HOPL foresee any projected overproduction. | Yes |
| D.5 Record keeping | | | |
| D.5.1 | <p>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p><i>IP Mill must report on real time basis.</i></p> | <p>Hargy Oil Palms Limited, Hargy POM records and balance all receipt FFB and outgoing stock of CPO and PK on daily basis.</p> <p>Record verified in Barema POM: FFB receipt from Company owned plantation:</p> <ul style="list-style-type: none"> - FFB Receiving Slip #FFBIP19008479W, dated 02/09/2019, origin: Hargy Division Barema 1, Lorry VH12, Product: Fresh Fruit Bunche IP, DO 224396, Remarks S049/F14, Block 07E16; YOP 2007; ABW 18 kg: amount 387 bunches; nett weight 6.70 tons. - FFB Receiving Slip #FFBIP19003724W, dated 03/05/2019, origin: Navo Division Kiba 2, Lorry VH23, Product: Fresh Fruit Bunche IP, | Yes |

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|-----------------------|--|---|-----|
| | | <p>DO 177876, Remarks SK124/F12, Block 99E14; YOP 1999; ABW 30 kg: amount 540 bunches; nett weight 16.06 tons.</p> <p>FFB receipt from smallholders: FFB docket No.001019-000823, from trip No.0095, FFB from smallholder in Wilelo area, division MaututuFG, dated 3 October 2019; weight 14,020 tons.</p> <p>HOPL-Barema POM weighbridge ticket No.FFBIP19009250W dated 3 October 2019; lorry No.VC12; FFB from smallholder Maututu division, year of planting 2000, docket No.038877 (17BD0265; 1,070 kg, Jim N, 1795, Soi), 038876 (17BD0115; 1,017 kg, Rubie, 1796, Soi), 038875 (17BCDC35; 1,253 kg, Andreas, 1797, Soi), 038874 (17BD-2D5; 1,534 kg, Carol, 1795, Soi), 038873 (17BCF861; 3.459 kg, Rutu S., 1786, Soi), 038870, 038872, 038873 (17BCE84B; 5,278 kg, Sogi G., 1786, Soi); trip No.0095; weight 13.76 tons.</p> <p>Daily production report (FFB to CPO and PK) Barema POM Daily Production Figure 28 September 2019, as reported on 29 September 2019: FFB IP stock before 102 tons; FFB received 578.28 tons; FFB processed 648.28 tons; stock carry forward 32 tons; processing hour 16.03 hours; mill throughput 40.44 tons; OER 25.03%; CPO produced 162.24 tons; KER 5.2%; PK produced 33.68 tons. CPO stocks before 674.81 tons; CPO dispatched 96.54 tons; CPO stock carry forward 740.51 tons; PK stock before 9.57 tons; PK dispatched 0; PK crushed 34 tons; PK stock carry forward 80.69 tons.</p> | |
| D.6 Processing | | | |
| D.6.1 | <p>The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.</p> | <p>The procedure for production recording as in PRO-ESD-SCC-009-01, Record Keeping dated 21 May 2019 - has rules out a record keeping for RSPO certified FFB CPO and PK.</p> <p>At the moment, all FFB sources are certified. There is no non-certified FFB sources coming to Hargy POMs.</p> <p>All records are provided and traceable such as Daily production report for Hargy POM, Monthly progress report, and 3-monthly balance system.</p> <p>Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM and downgrading</p> | Yes |

| | | | |
|--|--|--|--|
| | | certified CPO "IP" into "SG" in Bulking Station due to mixing certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL. | |
|--|--|--|--|

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Supply Chain Declaration *(Applicable For Appendix E)*

| A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|--|--------------|--|--|----------------------|
| No. | Month - Year | Volume of FFB from certified supply bases (mt) | Volume of FFB from uncertified supply bases (mt) | Total FFB/Month (mt) |
| 1 | Jul 2018 | 49,778.30 | 0 | 49,778.30 |
| 2 | Aug 2018 | 48,759.00 | 0 | 48,759.00 |
| 3 | Sep 2018 | 43,077.10 | 0 | 43,077.10 |
| 4 | Oct 2018 | 50,564.80 | 0 | 50,564.80 |
| 5 | Nov 2018 | 52,500.20 | 0 | 52,500.20 |
| 6 | Dec 2018 | 43,958.80 | 0 | 43,958.80 |
| 7 | Jan 2019 | 46,366.40 | 0 | 46,366.40 |
| 8 | Feb 2019 | 31,402.30 | 0 | 31,402.30 |
| 9 | Mar 2019 | 46,514.20 | 0 | 46,514.20 |
| 10 | Apr 2019 | 44,877.90 | 0 | 44,877.90 |
| 11 | May 2019 | 54,501.30 | 0 | 54,501.30 |
| 12 | Jun 2019 | 37,746.00 | 0 | 37,746.00 |
| 13 | Jul 2019 | 25,657.50 | 0 | 25,657.50 |
| 14 | Aug 2019 | 22,930.26 | 0 | 22,930.26 |
| | | 598,634.06 | 0 | 598,634.06 |

Note:
 Last audit was in August 2018. This audit period postponed until October 2019. The calculation period July 2018 – August 2019.

| B. Monthly Records of Certified CPO & PK since the last audit | | | |
|--|--------------|--------------------|-------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| 1 | Jul 2018 | 11,706.82 | 2,544.81 |
| 2 | Aug 2018 | 11,397.43 | 2,449.86 |
| 3 | Sep 2018 | 10,307.03 | 2,233.29 |
| 4 | Oct 2018 | 12,920.58 | 2,603.81 |
| 5 | Nov 2018 | 13,341.96 | 2,738.05 |
| 6 | Dec 2018 | 11,443.11 | 2,192.95 |
| 7 | Jan 2019 | 9,521.90 | 2,245.90 |
| 8 | Feb 2019 | 6,850.06 | 1,517.96 |
| 9 | Mar 2019 | 10,587.07 | 2,357.46 |
| 10 | Apr 2019 | 10,838.87 | 2,284.92 |
| 11 | May 2019 | 13,232.35 | 2,778.76 |
| 12 | Jun 2019 | 9,108.90 | 1,900.86 |
| 13 | Jul 2019 | 5,704.89 | 1,197.34 |
| 14 | Aug 2019 | 5,256.64 | 1,016.20 |
| | | 142,217.61 | 30,062.19 |

Note:
 Last audit was in August 2018. This audit period postponed until October 2019. The calculation period July 2018 – August 2019.

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| C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) | | | | |
|--|--------------------|---|--------------------------------|-------------------------------|
| No. | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| July 2018 | | | | |
| | Nil | | | |
| August 2018 | | | | |
| 1 | Buyer H | TR-6e389554-59db | | 2,000.19 |
| 2 | Buyer C | TR-ae0e0be4-a30c | 500 | |
| 3 | Buyer C | TR-ac5d82ba-b6cc | 500 | |
| 4 | Buyer C | TR-bb8044ae-1bb4 | 500 | |
| 5 | Buyer C | TR-e124c888-638b | 500 | |
| 6 | Buyer C | TR-9578a3c-559d | 1,500 | |
| 7 | Buyer C | TR-c7b4a0c9-a12a | 1,500 | |
| 8 | Buyer C | TR-1caac607-7cdc | 500 | |
| September 2018 | | | | |
| 9 | Buyer H | TR-31b281a3-e0cd | | 2,228.95 |
| October 2018 | | | | |
| 10 | Buyer C | TR-21dedba0-dc5d | 5,502.13 | |
| 11 | Buyer C | TR-c6da6003-409d | 2,000 | |
| 12 | Buyer C | TR-O889a5d2-f1ba | 3,000 | |
| 13 | Buyer C | TR-71173749-c243 | 1,500 | |
| 14 | Buyer C | TR-4204beea-9d0b | 500 | |
| 15 | Buyer C | TR-d602b126-00a0 | 500 | |
| 16 | Buyer C | TR-209b143d-ee7b | 500 | |
| 17 | Buyer C | TR-db452a64-12c4 | 500.01 | |
| 18 | Buyer C | TR-f0a048e9-33fb | 500 | |
| 19 | Buyer C | TR-4e6dc791-52bb | 500 | |
| 20 | Buyer C | TR-712caa60-2308 | 500 | |
| 21 | Buyer C | TR-23e99486-a222 | 1,500 | |
| 22 | Buyer C | TR-b571de6c-16a4 | 500 | |
| 23 | Buyer C | TR-594cb1cc-aa88 | 500 | |
| 24 | Buyer C | TR-71609fa0-2241 | 500 | |
| 25 | Buyer C | TR-0030945d-04a9 | 500 | |
| 26 | Buyer C | TR-dd838470-0217 | 500 | |
| 27 | Buyer C | TR-8d638035-af88 | 500 | |
| 28 | Buyer C | TR-5c52792b-8b2e | 500 | |
| 29 | Buyer C | TR-1e62deae-10d8 | 500 | |
| 30 | Buyer C | TR-8865a520-2eaf | 500 | |
| 31 | Buyer C | TR-O9517959-3b69 | 525 | |
| 32 | Buyer C | TR-d14d9eef-883d | 525 | |
| 33 | Buyer C | TR-a44055f5-c036 | 500 | |
| 34 | Buyer C | TR-60886437-04e0 | 1,050 | |
| 35 | Buyer H | TR-ab04b261-edda | | 2,226.19 |
| November 2018 | | | | |
| 36 | Buyer C | TR-b761c66f-9a77 | 1,035.28 | |
| December 2018 | | | | |
| 37 | Buyer H | TR-80b40d6b-dd86 | | 4,453.65 |
| January 2019 | | | | |
| | Nil | | | |
| February 2019 | | | | |
| 38 | Buyer C | TR-81e8986e-d4de | 1,002 | |
| 39 | Buyer C | TR-45d71715-810d | 1,002 | |
| 40 | Buyer C | TR-7ef945a2-62ff | 1,002 | |
| 41 | Buyer C | TR-e98ca899-dee3 | 1,002 | |
| 42 | Buyer C | TR-dc30c072-6bce | 2,002 | |
| 43 | Buyer C | TR-9ab145e9-b482 | 2,002 | |
| 44 | Buyer C | TR-2da0068b-d344 | 2,002 | |
| 45 | Buyer C | TR-954a465f-f8ba | 1,002 | |
| 46 | Buyer C | TR-34171c08-5ded | 504.52 | |
| 47 | Buyer H | TR-11e7f47f-3dc9 | | 2,670.26 |
| 48 | Buyer F | TR-f864771f-c38e | 500 | |

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| | | | | |
|-------------------|---------|-------------------|----------|----------|
| 49 | Buyer F | TR-33b0f352-7459 | 525 | |
| 50 | Buyer F | TR-a5772aeb-1230 | 500.27 | |
| 51 | Buyer C | TR-46afc2f8-07c6 | 500.26 | |
| 52 | Buyer C | TR-5efac593-0f52 | 500.26 | |
| 53 | Buyer C | TR-edd19d44-b006 | 1,000.26 | |
| 54 | Buyer C | TR-0d5e7ddf-5a61 | 500.26 | |
| 55 | Buyer C | TR-314cdc99-789c | 500.27 | |
| 56 | Buyer C | TR-fce7869c-1570 | 2,500.25 | |
| 57 | Buyer C | TR-a4d1c9d6-e7fc | 2,000.27 | |
| 58 | Buyer C | TR-4845c321-e35c | 3,000.27 | |
| 59 | Buyer C | TR-7d7d0978-caae | 1,000.27 | |
| 60 | Buyer C | TR-48a8c33d-9fca | 525 | |
| 61 | Buyer C | TR-78551dcc-7059 | 525 | |
| 62 | Buyer C | TR-a5ce4b97-038a | 525 | |
| 63 | Buyer C | TR-3fa31570-169c | 1,050 | |
| 64 | Buyer C | TR-dd10106a-1276 | 525 | |
| 65 | Buyer C | TR-09416d45-a014 | 525 | |
| 66 | Buyer C | TR-19c1168f-06f8 | 2,100 | |
| 67 | Buyer C | TR-a50616f2-a810 | 1,050 | |
| 68 | Buyer C | TR-5e46f332-715d | 1,050 | |
| 69 | Buyer C | TR-1afa865f-6578 | 1,050 | |
| 70 | Buyer C | TR-6d311edd-4523 | 1,050 | |
| 71 | Buyer C | TR-43ba54e1-2132 | 500 | |
| 72 | Buyer C | TR-5417a507-d192 | 500 | |
| 73 | Buyer C | TR-19bf2e5e-b145 | 500 | |
| 74 | Buyer C | TR-9a7ef379-cd55 | 2,000 | |
| 75 | Buyer C | TR-39a94bef-5e64 | 996 | |
| 76 | Buyer C | TR-24d126ca-f7e9 | 1,000 | |
| 77 | Buyer C | TR-69d98e16-bc20 | 1,000 | |
| 78 | Buyer C | TR-f97fa3e5-f8e3 | 1,000 | |
| 79 | Buyer C | TR-4871f0a7-820e | 995.02 | |
| 80 | Buyer C | TR-43acbd6f-bbab | 1,000 | |
| 81 | Buyer C | TR-abf30b6c-c028 | 1,000 | |
| 82 | Buyer C | TR-89e6a193-cf2b | 1,000 | |
| March 2019 | | | | |
| 83 | Buyer C | TR-a7733582e-88c1 | 1,002.77 | |
| 84 | Buyer C | TR-565d5f47-e342 | 2,002.76 | |
| 85 | Buyer C | TR-d6c5ad88-cfbc | 1,002.76 | |
| 86 | Buyer C | TR-93c63e3a-e1e9 | 502.76 | |
| 87 | Buyer C | TR-f35c35b8-3786 | 1,002.76 | |
| 88 | Buyer C | TR-a5890bee-06b6 | 1,002.76 | |
| 89 | Buyer C | TR-1f1b329f-5b76 | 1,002.78 | |
| 90 | Buyer C | TR-69053821-4624 | 4,002.78 | |
| 91 | Buyer F | TR-6509891a-322d | 502.76 | |
| April 2019 | | | | |
| 92 | Buyer H | TR-O1550172-8d07 | | 2,226.20 |
| 93 | Buyer H | TR-fbaacf96-02eb | | 1,675.51 |
| 94 | Buyer C | TR-839ea39a-68c4 | 500 | |
| 95 | Buyer C | TR-38c80da7-c65a | 500 | |
| 96 | Buyer C | TR-25aeb444-7f6f | 500 | |
| 97 | Buyer C | TR-ec50506f-0a8a | 500 | |
| 98 | Buyer C | TR-30bc1aa2-99ce | 500 | |
| 99 | Buyer C | TR-43379dc5-062e | 500 | |
| 100 | Buyer C | TR-b6b2b2db-6768 | 1,000 | |
| 101 | Buyer C | TR-2361e3ad-ab53 | 500 | |
| 102 | Buyer C | TR-71e6f13e-a350 | 500 | |
| 103 | Buyer C | TRe3c20404-da4a | 500 | |
| 104 | Buyer C | TR-7f7a8ce2-c7b7 | 500 | |
| 105 | Buyer C | TR-c364f632-10a6 | 500 | |
| 106 | Buyer C | TR-96859da9-b98e | 997.14 | |
| 107 | Buyer F | TR-586cebd3-2bdd | 500 | |
| 108 | Buyer C | TR-e326a5e5-931e | 500 | |

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| | | | | |
|------------------|------------|-------------------|------------|-----------|
| 109 | Buyer C | TR-524dafa1-247c | 500 | |
| 110 | Buyer C | TR-18df83db-dcdc | 500 | |
| 111 | Buyer C | TR-14efa7b6-be76 | 500 | |
| 112 | Buyer C | TR-28286a47-75c3 | 500 | |
| 113 | Buyer C | TR-7f9aa457-9ebc | 500 | |
| 114 | Buyer C | TR-4338d9ef-eea3 | 1,000 | |
| 115 | Buyer C | TR-1837be8e-0d2b | 500 | |
| 116 | Buyer C | TR-45db27bb-6024 | 500 | |
| 117 | Buyer C | TR-4bfa65ef-e631 | 500 | |
| 118 | Buyer C | TR-0291c82d-41cc | 500 | |
| 119 | Buyer C | TR-d6ceae8-013e | 500 | |
| 120 | Buyer C | TR-b9b9fe9f-3863 | 500 | |
| 121 | Buyer C | TR-a79b5923-620a | 1,500.74 | |
| 122 | Buyer F | TR-5867c8ab-04a9 | 500 | |
| May 2019 | | | | |
| 123 | Buyer C | TR-f5c8a4f4-e93f | 2,500 | |
| 124 | Buyer F | TR-2de03a67-42ca | 502 | |
| 125 | Buyer C | TR-46bf7317-d0cd | 500 | |
| 126 | Buyer C | TR-63cf5271-40bc | 500 | |
| 127 | Buyer C | TR-b6e526e2-152c | 500 | |
| 128 | Buyer C | TR-de94ad4d-0cfd | 500 | |
| 129 | Buyer C | TR-8fded790-17f6 | 500 | |
| 130 | Buyer C | TR-62052002-6c04 | 500 | |
| 131 | Buyer C | TR-ce48389c-c483 | 1,000 | |
| 132 | Buyer C | TR-cf25ef7e-e747 | 500 | |
| 133 | Buyer C | TR-131fffb5-bf99 | 500 | |
| 134 | Buyer C | TR-7414ab40--023d | 500 | |
| 135 | Buyer C | TR-9b23ccbc-e9e2 | 500 | |
| 136 | Buyer C | TR-128c61fa-4d1b | 500 | |
| 137 | Buyer C | TR-5b6ccb66-c1e1 | 500 | |
| 138 | Buyer H | TR-d4f292f2-e98f | | 4,437.72 |
| 139 | Buyer H | TR-1c4f73f5-e476 | | 1.01 |
| June 2019 | | | | |
| 140 | Buyer O | TR-b7f6ae60-92b3 | 2,495.64 | |
| July 2019 | | | | |
| | Nil | | | |
| | | | 118,172.01 | 21,919.68 |

Note:

Last audit was in August 2018. This audit period postponed until October 2019. The calculation period July 2018 – August 2019.

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)

| No. | Buyers Name | Scheme Name | CPO Sold (mt) | PK Sold (mt) |
|-----|-------------|-------------|---------------|--------------|
| | Nil | | | |

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)

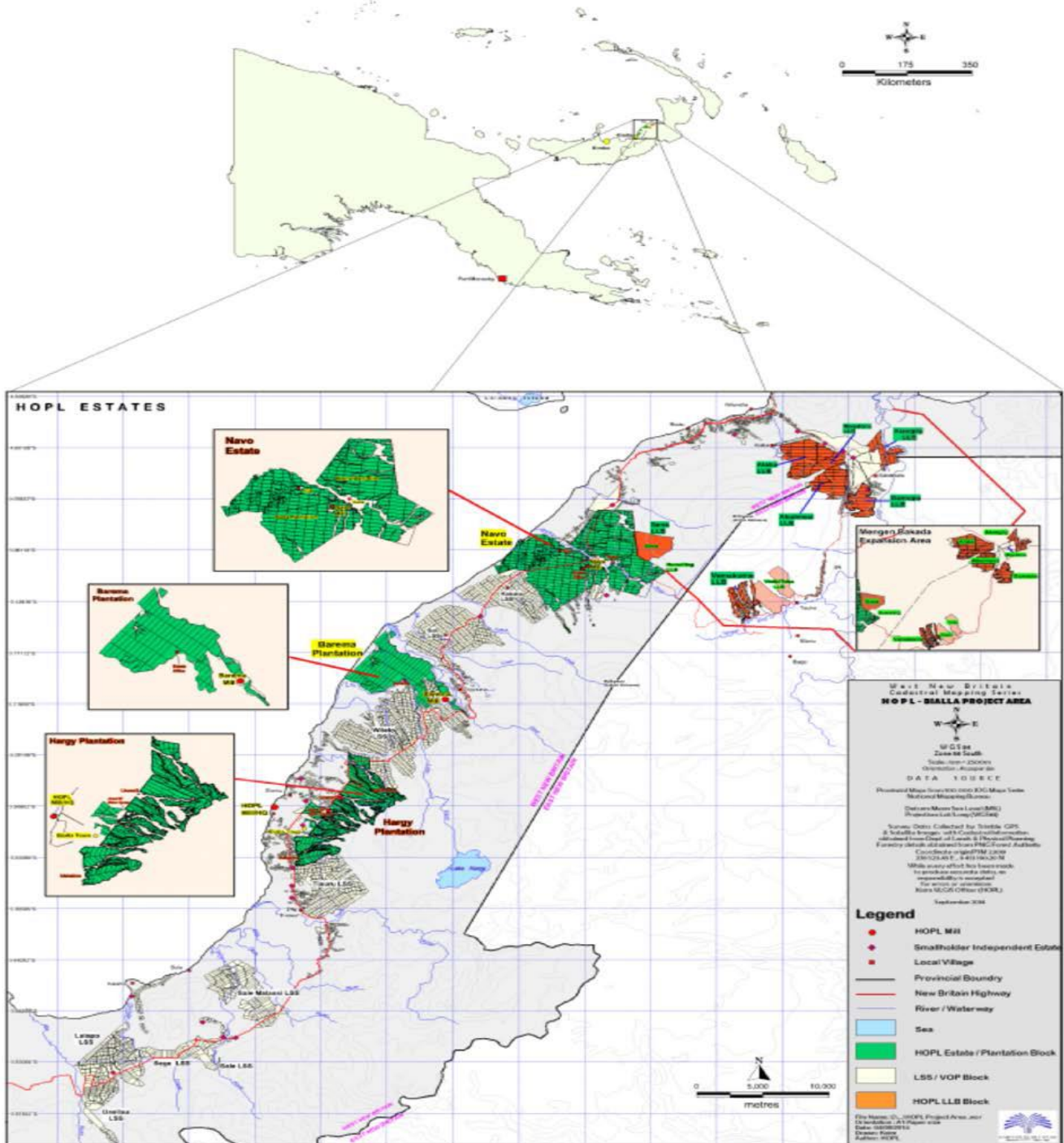
| No. | Buyers Name | CPO Sold (mt) | PK Sold (mt) |
|-----|-------------|---------------|--------------|
| | Nil | | |

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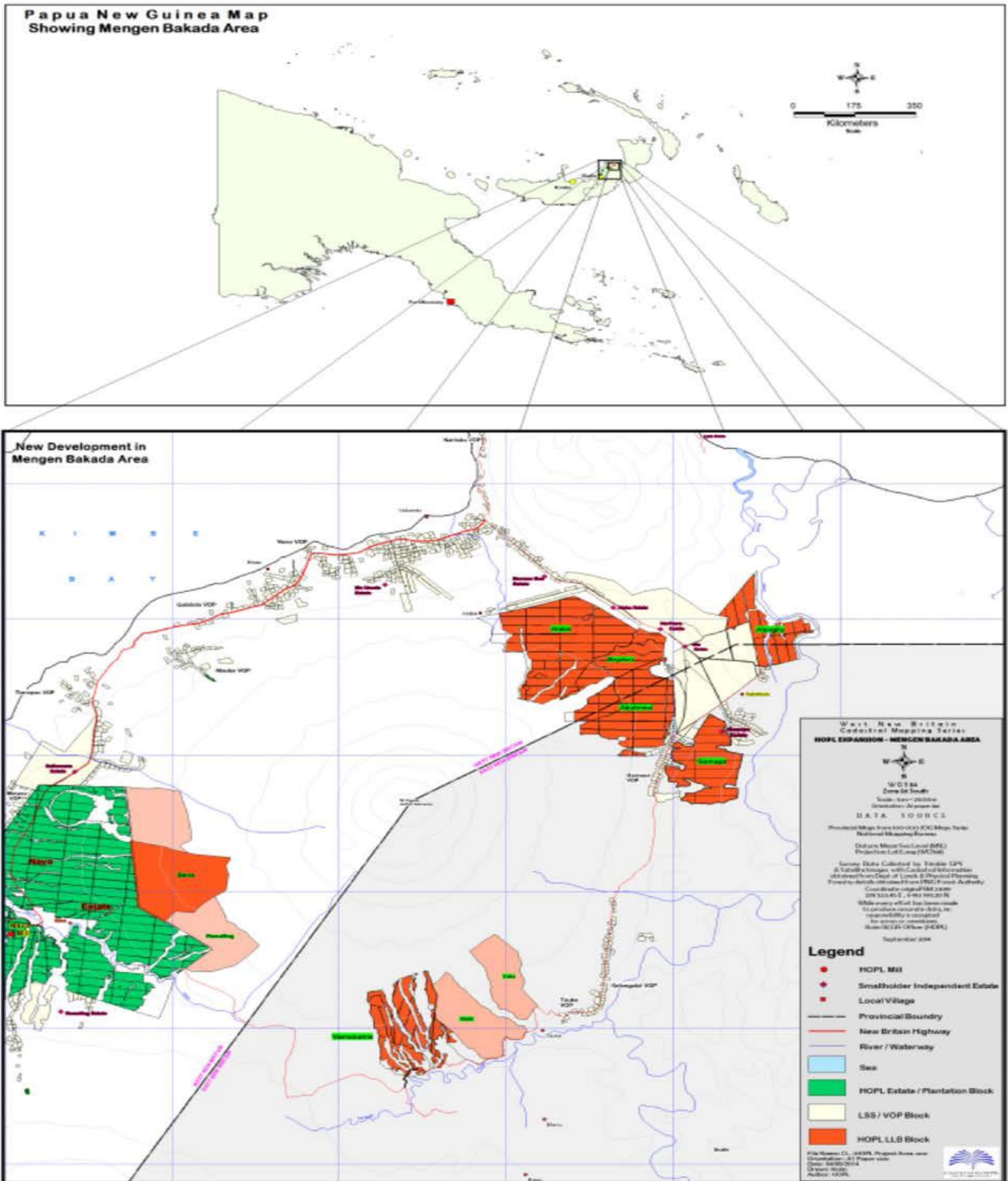
| F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) | | | |
|--|--------------------|---|--|
| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold (mt) |
| | Nil | | |

Appendix F: Location Map of Certification Unit and Supply bases

PNG Map Showing HOPL Estates



Appendix G: Estate Field Map



Appendix H: List of Smallholder Sampled

| Code | Name | Status | Hectarage |
|--------|----------------------|------------------------|-----------|
| 010299 | MANGALINA JOHN | Land Settlement Scheme | 6,18 |
| 010343 | GEORGE KUNUDAR | Land Settlement Scheme | 4,93 |
| 010278 | MARKUS LUKARA | Land Settlement Scheme | 4,12 |
| 010344 | ERICK WALI | Land Settlement Scheme | 6,83 |
| 021066 | MITIRO SALABUNG | Land Settlement Scheme | 5,30 |
| 021107 | NAUNIGI TUGUTE | Land Settlement Scheme | 6,35 |
| 021188 | MAX BUSON | Land Settlement Scheme | 5,82 |
| 021088 | SIRA DOANG | Land Settlement Scheme | 5,69 |
| 021474 | RONNY WALAKAWI | Land Settlement Scheme | 4,56 |
| 031316 | SABASTIAN WOLU | Land Settlement Scheme | 6,34 |
| 031364 | FLESIAN YUMBU | Land Settlement Scheme | 5,43 |
| 040767 | ANDREW LALOU | Land Settlement Scheme | 3,66 |
| 040610 | JOHN TABARI | Land Settlement Scheme | 1,95 |
| 040680 | MICHAEL LOPESE | Land Settlement Scheme | 2,59 |
| 040402 | JOE SUKA | Land Settlement Scheme | 3,09 |
| 040409 | VITOLO MERA | Land Settlement Scheme | 2,89 |
| 040748 | SUSAN DAIPO | Land Settlement Scheme | 4,84 |
| 040415 | JACOB MAVUTA | Land Settlement Scheme | 1,11 |
| 050175 | SAM TIARO | Land Settlement Scheme | 5,28 |
| 050174 | PAULIAS ALIAI | Land Settlement Scheme | 4,50 |
| 050199 | IEISA ISA | Land Settlement Scheme | 3,49 |
| 050188 | NERIUS SUALI TAVISOU | Land Settlement Scheme | 5,07 |
| 050212 | JACOB MILALE | Land Settlement Scheme | 1,77 |
| 080816 | MICHAEL WILLIMON | Village Oil Palm | 1,53 |
| 111174 | MARK DANIEL | Village Oil Palm | 1,52 |
| 111123 | LAELI TOGA | Village Oil Palm | 2,07 |
| 111111 | LESIA WALAU | Village Oil Palm | 1,49 |
| 120120 | FRED SAMUA GAA | Village Oil Palm | 2,00 |
| 121221 | KESIA BUJELI | Village Oil Palm | 4,00 |
| 131352 | DORCAS KAVELU | Village Oil Palm | 2,00 |
| 131324 | ROPA MATAMULI | Village Oil Palm | 1,99 |
| 131367 | GABRIEL SALUA | Village Oil Palm | 2,00 |
| 161681 | DARIUS BOKO | Village Oil Palm | 2,00 |
| 161646 | GIRE MARGRET SUKI | Village Oil Palm | 2,21 |
| 171783 | MATILDA M PALIK | Village Oil Palm | 2,00 |
| 171729 | ELIAS TOLUBA | Village Oil Palm | 1,14 |
| 171743 | TORUGA DALE | Village Oil Palm | 2,00 |
| 321082 | LEONORA KOLOSI | Land Settlement Scheme | 3,47 |
| 321160 | TETERI LOLOMA | Land Settlement Scheme | 0,02 |

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| | | | |
|--------|----------------------|------------------------|-------|
| 321081 | NICK KATUN | Land Settlement Scheme | 6,01 |
| 350060 | DIMON LUME | Village Oil Palm | 1,80 |
| 311790 | LAURENCE KITINAURU | Land Settlement Scheme | 3,90 |
| 311773 | MALCOLM GAR AVUSI | Land Settlement Scheme | 5,53 |
| 311784 | GEORGE LINGE | Land Settlement Scheme | 5,33 |
| 332002 | AMBROSS VITATA | Land Settlement Scheme | 3,72 |
| 331952 | PREIMUS AULAI | Land Settlement Scheme | 5,69 |
| 331872 | MATHEW RERE | Land Settlement Scheme | 4,81 |
| 331955 | KAIREN WAPIWAN | Land Settlement Scheme | 5,53 |
| 370017 | CLEMENT BALELE | Village Oil Palm | 2,00 |
| 380088 | HUBERTINA LAGISA | Village Oil Palm | 1,13 |
| 380115 | RUDOLF MELI | Village Oil Palm | 2,00 |
| 390099 | CHRISTOPHER METORE | Village Oil Palm | 0,86 |
| 390016 | MARTIN TEVANG | Village Oil Palm | 1,08 |
| 390101 | ANDREW KEPU | Village Oil Palm | 0,58 |
| 440021 | MARIA GABU BENO | Village Oil Palm | 10,93 |
| 440053 | JOHN KOINI | Village Oil Palm | 0,67 |
| 450003 | LEONARD BUBU | Village Oil Palm | 2,00 |
| 077252 | MICHELLE RAHAB VULIA | Village Oil Palm | 1,00 |
| 070753 | JAMES WESLEY | Village Oil Palm | 2,00 |
| 077135 | LOKO WARPIN | Village Oil Palm | 2,00 |

Appendix I: List of Abbreviations

| | |
|----------|--|
| a.i | Active Ingredient |
| BOD | Biochemical Oxygen Demand |
| BOGA | Bialla Oil Palm Growers Association |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm Oil |
| CSPO | Certified Sustainable Palm Oil |
| DO | Delivery Order |
| EFB | Empty Fruit Bunch |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| EMS | Environmental Management System |
| FFB | Fresh Fruit Bunch |
| FPIC | Free, Prior, Informed and Consent |
| GAP | Good Agricultural Practice |
| GHG | Greenhouse Gas |
| GMP | Good Manufacturing Practice |
| GPS | Global Positioning System |
| HCV | High Conservation Value |
| HOPL | Hargy Oil Palms Limited |
| ILG | Incorporated Land Group |
| IPM | Integrated Pest Management |
| IP | Identity Preserved |
| ISCC | International Sustainable Carbon Certification |
| LD50 | Lethal Dose for 50 sample |
| LSS | Land Settlement Scheme |
| MB | Mass Balance |
| MSDS | Material Safety Data Sheet |
| MT | Metric Tonnes |
| OER | Oil Extraction Rate |
| OPIC | Oil Palm Industry Corporation |
| OSH | Occupational Safety and Health |
| PK | Palm Kernel |
| PKO | Palm Kernel Oil |
| PNG | Papua New Guinea |
| PNG-OPRA | Papua New Guinea Oil Palm Research Association |
| POM | Palm Oil Mill |
| POME | Palm Oil Mill Effluent |
| PPE | Personal Protective Equipment |
| RSPO | Roundtable on Sustainable Palm Oil |
| P&C | Principles & Criteria |
| RTE | Rare, Threatened or Endangered species |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SG | Segregation |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |
| VOP | Village Oil Palms |