

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

- ☐ Initial Assessment
- ☑ Annual Surveillance Assessment (2_2)
- ☐ Recertification Assessment (Choose an item.)
 - **⊠** Extension of Scope

Client Company Name / Parent Company: IOI Corporation Berhad

Client Company / Parent Company Address: IOI City Tower 2, Lebuh IRC, IOI Resort City 62502 Putrajaya, Malaysia

Certification Unit:

Dynamic Plantations Bhd – Gomali Palm Oil Mill

Location of Certification Unit:

5th Mile, Jalan Gemas – Batu Anam, Batu Anam 85100 Segamat, Johor, Malaysia.

Date of Final Report: 11th October 2022



TABLE of CONTENTS Page No

Section 1: So	cope of the Assessment	3
1.	Company Details	
2.	Certification Information	3
3.	Other Certifications	4
4.	Location(s) of Mill & Supply Bases	4
5.	Description of Supply Base	5
6.	Plantings & Cycle	6
7.	Summary of Certified Tonnage of FFB (Own Certified Scope)	7
8.	Summary of Certified Tonnage of FFB (from other certified unit(s))	7
9.	Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)	8
10.	Summary of Certified Tonnage (MT) (not applicable for ISS)	8
11.	Summary of Actual Volume sold	9
12.	Independent Smallholders Certified Tonnage (MT) / Volume	10
13.	Independent Smallholders Actual Sold Tonnage / Volume	11
Section 2: As	ssessment Process	12
2.1	Assessment Methodology, Programme, Site Visits	12
2.2	BSI Assessment Team	13
2.3 Ass	essment Plan	16
Section 3: As	ssessment Findings	20
3.1	Multiple Management Units and Time Bound Plan	20
3.2	Progress of scheme smallholders and/or outgrowers	22
3.3	Details of Nonconformities	37
3.3.1	Status of Nonconformities Previously Identified and Observations	46
3.3.2	Summary of the Nonconformities and Status	49
3.4	Stakeholders and previous land owner / user consultation	50
3.5	Impartiality and conflict of interest	52
Formal Signi	ng-off of Assessment Conclusion and Recommendation	53
Appendix A:	Summary of Findings	54
Appendix B:	GHG Reporting Executive Summary	.174
	Location Map of Certification Unit and Supply bases	
	Estate Field Map	
	List of Smallholder Registered and/or sampled	
• •	List of Abbreviations	



Section 1: Scope of the Assessment

1. Company Details					
Parent Company	IOI Corporation Berhad				
RSPO Membership Number	2-0002-04-000-00	Membershi	Approval Date	17/05/2004	
Address	Head Office: IOI City Tower 2, Lebuh IRC, IOI Resort City, 62502 Putrajaya, Malaysia.				
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Dynamic Plantations Bhd - Go	omali Palm Oil	Mill		
Location / Address	Gomali Palm Oil Mill, 5th Mi Malaysia.	le, Jalan Gem	as-Batu Anam 851	00 Segamat, Johor,	
Website	www.ioigroup.com				
Management Representative	Kesavan Manohar E-mail gmm@ioigroup.com				
Telephone	+603-89478888 +607-9498245	Facsimile	+603-89478888 +607-9498245		

2. Certification Information						
Certificate Number	RSPO 727112	Certificat	te Start Date	23/08/2020		
Date of First Certification	23/08/2010	Certificat	te Expiry Date	22/08/2025		
Scope of Certification	Production of Palm Oil and Palm Kernel					
Visit Objectives	The objective of the assessment was to conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by Gomali POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.					
Assessment Cycle	 □ Pre Assessment (Choose a □ Initial Assessment ⋈ Annual Surveillance Assess □ Recertification Assessment ⋈ Scope Extension 	sment (ASA	_ ,			
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 RSPO P&C 2018 for the Production of Sustainable Palm Oil Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil					
Supply Chain Module	☑ Identity Preserved; ☐ Mass	s Balance	Mill Capacity	90 mt/hr		
ISH certification Phase	□ Eligibility □ Milestone A □ Milestone B ⋈ Not Applicable					



3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
MSPO 727190	Part 3 of MS 2530 – Plantations and organized smallholders	BSI Services Malaysia Sdn. Bhd	09/09/2023			
MSPO 727189	Part 4 of MS2530- Palm Oil Mill	BSI Services Malaysia Sdn. Bhd	09/09/2023			
MSPO 727219	Malaysian Sustainable Palm Oil Supply Chain Certification Standard (MSPO SCCS) under the MSPO Certification Scheme	BSI Services Malaysia Sdn. Bhd	28/08/2024			
EU-ISCC-Cert-DE100- 01719121	ISCC EU	SGS Germany GMbH	31/08/2022			

4. Location(s) of Mill & Supply Bases							
Name	Location	GPS Co	ordinates				
(Mill / Supply Base / Group Manager / Smallholders)		Latitude	Longitude				
Gomali POM	5th Mile, Jalan Gemas-Batu Anam, K.B. No. 102, 85100 Segamat, Johor, Malaysia.	2°36'38.47"N	102°40'45.98"E				
Gomali Estate	Jalan Gemas-Batu Anam, K.B. No. 102, 85100 Segamat, Johor, Malaysia.	2°36'41.07"N	102°40'24.00"E				
Paya Lang Estate	Batu Anam, 85100 Segamat, Johor, Malaysia.	2°34'56.06"N	102°42'27.06"E				
Tambang Estate	Tambang Estate, Batu Anam, Segamat 85100 Johor, Malaysia.	2°37'55.01"N	102°42'59.01"E				
Sagil Estate	8 Milestone, Jalan Tangkak-Segamat, 84900 Tangkak, Johor, Malaysia	2°18'54.01"N	102°38'04.09"E				
Regent Estate	2nd Mile, Jalan Batang Melaka, 73200 Gemencheh, Negeri Sembilan, Malaysia	2°30'50.06"N	102°24'16.08"E				
Bahau Estate	Batu 5, Jalan Bahau-Rompin, 72100 Bahau, Negeri Sembilan, Malaysia.	2°48'32.06"N	102°26'55.04"E				
Kuala Jelei Estate	5KM, Jalan Tampin, 72109 Bahau, Negeri Sembilan, Malaysia	2°46'28.04"N	102°23'23.01"E				
Bertam Estate	Flora Horizon Sdn Bhd, Bertam Estate, 76100 Durian Tunggal, Melaka, Malaysia.	2°18'14.05"N	102°17'05.06"E				
Jasin Lalang Estate	Air Merbau, Jalan Jasin Bemban, Jasin Melaka, Malaysia	2°15'16.09"N	102°25'16.03"E				
Bukit Dinding Estate	1 1/2 Miles, Jalan Mentakab, 28600 Karak, Pahang.	3°23'28.05"N	102°04'31.08"E				



Bukit Serampang Estate* KM 12, Jalan Sagil –Tangkak, 84900 Tangkak, Johor	2º19′53.07″N	102° 41′17.04″E	
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Notes:

*Bukit Serampang Estate was previously under IOI Pukin management unit which was certified under different CB. Decision made by management to restructure and include under Gomali management unit

5. Description of Supply Base							
New Planting Development	⋈ No (no change in	total planted area	a)	☐ Yes (please refer to Principle 7 for details)			
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted		
Gomali Estate	2,171.00	4.25	380.50	2,555.75	84.95		
Paya Lang Estate	1,827.00	2.51	637.74	2,467.25	74.05		
Tambang Estate	1,805.00	0.94	204.76	2,010.70	89.77		
Sagil Estate	1,744.00	7.70	753.29	2,504.99	69.62		
Regent Estate	2,133.00	2.65	164.62	2,300.27	92.73		
Bahau Estate	2,629.00	3.16	206.33	2,838.49	92.69		
Kuala Jelei Estate	631.00	2.68	45.58	679.26	92.90		
Bertam Estate	309.00	0	32.98	341.98	90.36		
Jasin Lalang Estate	694.00	0.35	53.08	747.43	92.85		
Bukit Dinding Estate	1,445.00	46.82	168.61	1,660.43	87.03		
*Bukit Serampang Estate	2,371.00	9.48	344.65	2,725.13	87.01		
Total	17,759	80.54	2,992.14	20,831.68			

Notes:

- 1) Gomali Estate
 - *Increase 0.87ha river due to GIS remapping
 - **Reduce 0.87ha infrastructure & others due to increase 0.87ha river
- 2) Paya Lang Estate
 - *Reduce 157ha planted area due to replanting
 - **Increase 1.76ha river after GIS remapping
 - ***Increase 155.24ha in infrastructure & others due to Reduce 1.76ha for river
- Tambang Estate
 - *Reduce 70ha planted area due to 69ha change of crop from oil palm to coconut planting coconut and 1ha for field roads
 - **Variance 0.17ha river due to updating Muar river boundary in field PM98A and PM03A based on current UAV Imagery by GIS Dept.
 - ***Increase 70.17ha in infrastructure & others due to 70ha change of crop from oil palm to coconut and variance 0.17ha due to updating muar river boundary
- 4) Sagil Estate
 - *Reduce 168ha planted area due to change of crop from oil palm to coconut



- ** Increase 168ha in infrastructure & others due to change of crop from oil palm to coconut
- 5) Regent Estate
 - *Reduce planted 2 ha RGE due to remapping and road by GIS department
 - **Variance 0.01ha river due to updated river in field RR20A (2) and new steep declare 0.16ha in estate area
 - ***Increase 1.85ha in infrastructure & others due to reduce planted area and declare new steep area
- 6) Bahau Estate
 - *Reduce 2 ha planted area due to replanting and GIS remapping for field PR21A (ex PM94C)
 - **Reduced 0.2ha due to demarcation of river boundary shown in UAV Imagery by GIS Dept.
 - ***Reduced 0.72ha in infrastructure & others due to updated area by GIS department
 - ****Reduce 2.92ha certified area due to GIS remapping and survey on December 2021
- 7) Kuala Jelai Estate
 - *Reduce 3ha planted area due to updated TNB in field PM04B based on last standing palm
 - **Increase 3ha in infrastructure & others due updated TNB area in estate area
- 8) Bertam estate
 - *Reduce in certified (106.82 ha), planted area (102 ha) and infrastructure & others (4.82ha) due to Paya Rumput Division (land belongs to Hartawan Development) was disposed to third party on 09.08.2021.
- 9) Jasin Lalang Estate
 - *Increase 0.01ha river due to GIS adjustment and remapping
 - **Reduce 3.33ha in infrastructure & others due to updated new land title area by GIS department and admin department
 - ***Reduce 3.32ha certified area due to updated new land title area by GIS department and admin department
- 10) Bukit Dinding Estate
 - *Reduce 2 ha planted area due to GIS adjustment and remapping
 - ** Increase 2ha in infrastructure & others due to reduce of planted area
- 11) Bukit Serampang Estate
 - *With effect from 1st July 2021, Bukit Serampang Estate had been transferred to Gomali grouping

6. Plantings & Cycle							
Estate / Smallholders		Age (Ye	Mature	Immature			
	0 - 3	4 - 14	15 - 25	>25			
Gomali Estate	220	279	1670	2	1,951	220	
Paya Lang Estate	13	790.5	1,023.5	0	1,814	13	
Tambang Estate	75	660.5	996.5	73	1,730	75	
Sagil Estate	489	422.5	377.5	455	1,255	489	
Regent Estate	454	831.5	583.5	264	1,679	454	
Bahau Estate	494	1251	597	287	2,135	494	
Kuala Jelei Estate	0	271	360	0	631	0	
Bertam Estate	0	0	309	0	309	0	
Jasin Lalang Estate	0	0	0	694	694	0	
Bukit Dinding Estate	52	593.5	799.5	0	1,393	52	
Bukit Serampang Estate	160	411	1766	34	2,211	160	



	Total (ha)	1,957	5,511	8,482.5	1,809	15,802	1,957
Note:							

7. Summary of Certified Tonnage of FFB (Own Certified Scope)							
Estate /		Tonnage ((MT) / year				
Smallholders	Estimated (Aug 21 – July 22)	Actual (July 21 – April 22)		Forecast (Aug 22 – July 23)			
		Previous license period (July 21 – Aug 21)	Current license period (Sept 21 – Apr 22)				
Gomali Estate	38,220.00	6,422.54	22,741.21	34,250			
Paya Lang Estate	37,710.00	6,329.32	20,305.81	36,060			
Tambang Estate	27,935.00	4,105.14	15,663.14	26,617			
Sagil Estate	34,415.00	2,646.57	14,105.38	18,990			
Regent Estate	33,631.00	4,729.24	19,594.24	35,020			
Bahau Estate	43,920.00	7,379.88	28,312.54	44,990			
Kuala Jelei Estate	14,710.00	2,021.08	9,147.02	13,160			
Bertam Estate	11,460.00	1,137.67	5,629.37	7,510			
Jasin Lalang Estate	13,820.00	2,484.99	7,396.68	12,590			
Bukit Dinding Estate	37,713.00	4,865.56	15,909.95	34,680			
Bukit Serampang Estate	0	5,669.52	19,816.06	38,450			
Total	293,534	226,4	12.91	302,317			
Note:							

8. Summary of Certified Tonnage of FFB (from other certified unit(s))						
Estate /		Tonnage ((MT) / year			
Smallholders	Estimated (Aug 21 – July 22)					Forecast (Aug 22 – July 23)
		Previous license period (July 21 – Aug 21)	Current license period (Sept 21 – Apr 22)			
Segamat Estate		472.8	3,487.23			
Pukin Estate		182.23	2,274.13			
Shahzan 2 Estate		538.68	2,542.33			
Shahzan 1 Estate		202.41	2,406.88			
Total 12,106.69						
Note:						



9. Summary of Non-Certified Tonnage of FFB (outside supplier — excluded from certificate)						
Out growers /	Tonnage (MT) / year					
smallholders	Estimated (Aug 21 – July 22)	Actual (July 21 – April 22)		Forecast (Aug 22 – July 23)		
		Previous license period (July 21 – Aug 21)	Previous license period (Sept 21 – Apr 22)			
N/A						
Total	N/A	N/A		N/A		
Note:						

9A. I	9A. Monthly Records of Certified and Uncertified FFB Received since the last audit								
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)					
1	July 21	25,972.22	-	25,972.22					
2	Aug 21	23,215.41	-	23,215.41					
3	Sept 21	28,601.02	-	28,601.02					
4	Oct 21	23,811.27	-	23,811.27					
5	Nov 21	22,526.88	-	22,526.88					
6	Dec 21	15,714.66	-	15,714.66					
7	Jan 22	19,972.47	-	19,972.47					
8	Feb 22	26,703.24	-	26,703.24					
9	Mar 22	27,207.38	-	27,207.38					
10	Apr 22	24,795.05	-	24,795.05					
	TOTAL	238,519.6	-	238,519.6					
Note	Note:								

10. Summary of Certified Tonnage (MT) (not applicable for ISS)								
Estimated (Aug 21 – July 22)		Act (July 21 -	Forecast (Aug 22 – July 23)					
	Previous license period (July 21 – Aug 21)		Previous license period (Sept 21 – Apr 22)					
FFB		F	FB	FFB				
293,534.00 mt	49,187.63	3 mt	189,331.97 mt	302,318 mt				
	TOTAL	238,519.60 mt						
CPO (OER: 22.04%)	CPO (OER: 21.84%)		CPO (OER: 22.50%)					



64,694.89 mt	10,996.20 mt		41,098.88 mt	68,021.55 mt
	TOTAL	FOTAL 52,095.08 mt		
PK (KER: 5.06%)		PK (KER	PK (KER: 5.75%)	
14,852.82 mt	2,337.43 mt		8,584.34 mt	17,473.98 mt
	TOTAL	TOTAL 10,921.77 mt		
Note:	•	•		•

10A. Mo	nthly Records of Certified CF	PO & PK since the last audit	
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 21	5,807.02	1,169.68
2	Aug 21	5,189.19	1,167.75
3	Sept 21	6,409.26	1,415.39
4	Oct 21	5,313.48	1,058.87
5	Nov 21	4,917.23	970.81
6	Dec 21	3,412.60	661.41
7	Jan 22	4,275.65	838.66
8	Feb 22	5,580.89	1,227.04
9	Mar 22	5,907.52	1,287.66
10	Apr 22	5,282.24	1,124.50
	TOTAL	52,095.08	10,921.77

Current Lice	nse period (Sept 21 – A	pr 22)			
	DCDO CLife - L	Other Scher	nes Certified		
	RSPO Certified	ISCC	Others	Conventional	Total
CPO (MT)	38,122.06	-	-	131.16	38,253.22
PK (MT)	7,300.36	-	-	-	7,300.36
Credits	-	-	-	-	-
Previous Lice	ense period (July 21 – A	lug 21)			
CPO (MT)	9,611.32	-	-	-	9,611.32
PK (MT)	1,783.27	-	-	-	1,783.27
Credits		-	-	-	-



11A. Re	11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)								
No.	No. Buyers Name PalmTrace Trading Certified CPO Sold Certified PK Sold (MT)								
1	Non-disclosure	RSPO_PO1000003601	47,733.38	9,083.63					
		TOTAL	47,733.38	9,083.63					
Note:									

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)										
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)						
	Nil									
	TOTAL									
Note:										

11C. Re	11C. Records of CPO & PK Sold as conventional since the last audit (if any)							
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)					
1	Non-disclosure	131.16	0.00					
	TOTAL	131.16	0.00					
Note:								

11D. R	11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)								
No.	Buyers Name PalmTrace Trading RSPO Credits of CLicense Number CPO Sold								
	Nil								
	TOTAL								
Note:									

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (Not Applicable)		Actual (Not Applicable)			Forecast (Not Applicable)			
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B



Phase	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									
CSPK									

12A.	12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit									
No. Month - Year FFB Certified CPO Certified PK Certified PKO (MT) (MT) (MT) (MT)										
TOTAL										
Note	Note: Not Applicable									

13. Independent Smallholders Actual Sold Tonnage / Volume								
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	СЅРК	IS-CSPKO	IS-CSPKE	
Current L	Current License period (Not Applicable)							
Credits								
Physical								
Previous	License period	(Not Applicable)						
Credits								
Physical								

13A.	13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	No. Buyers Name PalmTrace Trading License Number FFB Sold (MT) CPO Sold (MT/credit) Certified PK Sold (MT/credit) Certified PKO Sold (MT/credit) Certified							
TOTAL								
Note	Note: Not Applicable							



Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067) Suite 29.01 Level 29, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 23-27/5/2022. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **13/8/2022** The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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



For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

Assessment Program	Assessment Program								
Name (Mill / Supply Base)	Year 1 (RC2)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)				
Gomali POM	√	✓	√	✓	√				
Gomali Estate		✓		✓					
Paya Lang Estate		✓		✓					
Tambang Estate		✓			√				
Sagil Estate		✓			✓				
Regent Estate			✓		✓				
Bahau Estate	√		✓						
Kuala Jelei Estate	√		✓						
Bertam Estate	√			√					
Jasin Lalang Estate	√			✓					
Bukit Dinding Estate			✓		√				
Bukit Serampang			✓						

Tentative Date of Next Visit: May 22, 2023 - May 26, 2023

Total Number of Mandays: 15 man days

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Hidhir Bin Zainal Abidin (MH)	Team Leader	 Education: Bachelor Degree in Chemical Engineering, National University of Malaysia Work Experience: 7 years working experience in palm oil industry specifically on palm oil milling for 5 years Auditor for several standards including ISO 9001, ISO 140001, OHSAS
		18001, MSPO and RSPO since 2012
		Training attended:
		3) ISO 9001 Lead Auditor Course
		4) ISO 14001 Lead Auditor Course
		5) OHSAS 18001 Lead Auditor Course in 2012



	1	
		6) Endorsed RSPO P&C Lead Auditor Course in 2013
		7) MSPO Awareness Training in 2014
		8) Endorsed RSPO SCCS Lead Auditor Course
		9) SMETA Auditor training
		10) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course
		Aspect covered in this audit:
		Legal requirements, policies and commitment, social aspects, contract agreement, human rights, land use rights, workers' welfare, and supply chain.
		Language proficiency:
		English and Bahasa Malaysia
Muhamad Naqiuddin Mazeli	Team Member	Education: Holds a Bachelor of Science Horticulture, University Putra Malaysia
(MN)		Work Experience: 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&C, ISCC, and ISO9001 and ISO 18001 for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO and other certifications where applicable to the operations during previous company.
		Training attended: He has completed ISO 9001: 2015 Lead Auditor Course, ISO 14001: 2015 Lead Auditor Course, ISO 45001: 2018 Lead Auditor Course, HCV & HCS Introductory Training, Endorsed RSPO P&C Lead Auditor Course and Social Auditing & SMETA Training
		Aspect covered in this audit: Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, GAP, mill best practices, training, and economic management plan.
		Language proficiency: English and Bahasa Malaysia
Vijay Kanna Pakirisamy (VK)	Team Member	Education: Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.
		Work Experience: He has 10 years' experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.
		Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training.
		Aspect covered in this audit: During this assessment, he assessed on the aspects of Environmental Best Practises, HCV and supply chain requirements.
		Language proficiency: English, Bahasa Malaysia and Tamil.
Mohamad Razaleigh	Team Member	Education: Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).
(MR)		Work Experience: He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was



		Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements
		Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training
		Aspect covered in this audit: Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, training, and economic management plan
		Language proficiency: English and Bahasa Malaysia
Dr Suhaili Sahari	Peer reviewer	Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.
		Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.
		Training attended:
		1. ISO 9001:2015 Lead Auditor and Internal Auditor
		2. ASI Peer Reviewer
		3. Safety & Health
		4. ISO 14001:2015 Standard
		5. RSPO Standards: RSPO P&C 2018 MY-NI 2019
		6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4
		7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS
		8. HACCP MS 1480:2019
		9. GAP Standard : Global GAP, Euru GAP

Accompanying Persons: Not applicable



2.3 Assessment Plan

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

Date	Time	Subjects	МН	VK	MR	MN
			Tea	m A	Tea	ım B
Sunday	PM	Audit team travel to Segamat. Check in at VIP Hotel, Segamat	√	√	-	-
22/05/2022	PM	Audit team travel to Karak. Accommodation TBC	-	-	√	\checkmark
Monday 23/05/2022	0730	Audit team travel to Gomali POM & Bkt Dinding Estate	√	√	√	√
Gomali POM: Team A Bkt Dinding Estate: team B	0830 0900	 Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). Verification on previous audit findings 				
	0900 1300	Gomali POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area. RSPO Supply chain requirements for mill - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims	< <	√ √		
	0900 1300	Bkt Dinding Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	-	-	√	√
	1300 1400	Lunch	√	√	√	√
	1400 1630	Gomali POM Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc	√	√	-	-



1	1400	Dist Dinding Estate			,	_ /
	1400 1630	Bkt Dinding Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	-	•	V	V
	1630 1700	Interim Closing Briefing	√	\	√	\checkmark
Tuesday 24/05/2022 Gomali POM &	0730 0830 1300	Audit team travel to Gomali POM and Bukit Dinding Estate Continue with unfinished element from day 1	√	√	√	√
Bukit Serampang Estate: Team A	1030 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	√	1	√	-
Bkt Dinding Estate & Kuala Jelei Estate:	1230 1330	Interim closing and Lunch break	√	√	√	√
team B	1330	Audit team travel to Bukit Serampang and Kuala Jelei Estate	√	√	√	√
	1430 1630	Bkt Serampang and Kuala Jelei Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	√
	1630 1700	Interim Closing Briefing	√	√	√	√
Wednesday 25/05/2022 Bkt Serampang: Team A Kuala Jelei Estate: Team B	0730 0830 1300	Travel to Bkt Serampang and Kuala Jelei Estate Continue with unfinished elements from day 2 Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√	√
	1000 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	√	-	√	-
	1300 1400	Lunch break	√	√	√	√
	1330 1630	Bkt Serampang and Kuala Jelei Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	V
	1630 1700	Interim Closing Briefing	√	√	√	√
Thursday 26/05/2022	0730	Travel to Regent and Bahau Estate	√	√	√	√



Regent Estate: Team A Bahau Estate: Team B	0830 1300	Continue with unfinished elements from day 3 Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.				
	1000 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	√	-	√	-
	1300 1400	Lunch break	√	√	√	√
	1330 1630	Regent and Bahau Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	>	√
	1630 1700	Interim Closing Briefing	√	√	√	√
Friday 27/05/2022 Regent Estate:	0730 0830 1230	Travel to Regent and Bahau Estate Continue with unfinished elements from day 4	√	√	√	√
team A Bahau Estate;	1230 1330	Interim closing and lunch break	√	√	√	√
team B	1330	Audit team travel to Gomali POM	√	√	√	√
	1500	Audit team discussion	√	√	√	√
	1600	Closing meeting – conclusion and recommendation	√	√	√	√
Saturday 28/05/2022	АМ	Audit team travel back to KL	√	-	-	√

Major NC close out visit

Time	Subjects	Mohd Hidhir
Friday PM	Travel to Segamat. Check in at VIP Hotel	√
Saturday 13/8/2022		
0745	Auditor travel to Gomali POM	√
0830 – 0845	Opening Meeting Opening Presentation by Audit team leader. Briefing on the verification plan	



Time	Subjects	Mohd Hidhir
0845 – 1130	Verification on previous Major NC. i) 2205750-202205-M1 – document review and contractor & worker's interview ii) 2205750-202205-M2 – workers/person in charge interview (individual and group session) and document review iii) 2205750-202205-M3 – workers/person in charge interview (individual and group session) and document review	√
1130 – 1200	Closing meeting - conclusion and recommendation	\checkmark



Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31st December 2021	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31st December 2021 and IOI ACOP 2020 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. The ACOP Report states that IOI Corporation Berhad plans to achieve 100% RSPO Certification for all estates and mill by 2023. https://www.rspo.org/members/62/IOI-Group RSPO secretariat approval obtained based on email communication dated 16/2/22.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new acquisition as to date.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No deviations	Complied
Have there been any changes to the time- bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	There has been no any changes to the time bound plan since the last audit. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31st December 2021. This is consistent with the ACOP Reporting last submitted for 2020.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31 st December 2021 and IOI ACOP 20202 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There has not been any isolated lapses in implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31 st December 2021 and IOI ACOP 2020 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There has not been any isolated lapses in implementation of the plan.	Complied
Un-Certified Units or Holdings		



No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Updates on the RSPO CP Complaints case tracking was referred to on issues related to this on IOI's uncertified units prior to and during the audit. Verified that incidences of HCV clearance that were reported at the IOI's uncertified unit at Kalimantan, Indonesia namely PT BSS since year 2010 is being resolved as per the RSPO NPP and RSPO CP Complaints processes. Another 1 unit namely PT KPAM at Kalimantan, had undergone the NPP Public Consultation and approved in April 2018 and HCSA Peer Review Assessment completed in May 2018. Currently, the plantation is under development and pending issuance of Local Government HGU. Reports on the NPP progress made to resolve the issues at the said units were checked and monitored till latest update made available on: https://askrspo.force.com/Complaint/s/case/5009000000028Erz8AAC/detail As off this audit, there has been no other incidences of any replacement of primary forest at any other area under the IOI group	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	The concession in Indonesia PT. KPAM had undergone the NPP process prior to any new planting. RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below: https://rspo.org/certification/new-planting-procedure/public-consultations/page/2? HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below: http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PTKPAM.pdf	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility as per the link below: https://askrspo.force.com/ Complaint/s/case/50090000028ErzqAAC/detail This is further check in the website: https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. Only 1 (one) management unit identified with potential liability and require concept note and remediation plan as reported in case tracker. Further information on the current progress is currently available in IOI Corporation Berhad's	Complied



	Website: https://www.ioigroup.com/Content/S/S Progress	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	There were no labour dispute reported	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There was no legal non-compliance reported.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Internal audit was carried out for IOI Pelita Plantation Sdn Bhd (Sejap and Tegai Estate) and SNA Group on November 2020. Positive assurance statement was made based on the audit results.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates	Complied
Have there been any stakeholder (including NGO) consultation conducted?	No stakeholder comments recorded	Complied

3.2 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?	Not applicable	Not Applicable					
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.							



Approved Time Bound Plan

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakon, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	Recertification audit : 30% remote audit done in Aug'21. Pending for follow-up onsite audit.	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2020	ASA-02: audit completed in November 2021	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Apr 2020	ASA-02 audit completed in November 2021	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, and Jasin Lalang	Aug 2009	Re-Certified in Oct 2020	ASA-01 audit completed in July 2021	No outstanding issues
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2020	ASA-01: 30% remote audit done in July'21. 70% onsite audit completed in November 2021.	No outstanding issues
6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	ASA-01: completed in September 2021	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	ASA-01: 30% remote audit done in Oct'21. Pending for follow-up onsite audit.	No outstanding issues
8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	Recertification audit completed in March 2021	No outstanding issues



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
9.	Leepang (Sabah) POM	Morisem 5, Leepamg 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Re-certified in December 2018	ASA-03: 30% remote audit done in Aug'21. 70% onsite audit completed in November 2021.	No outstanding issues.
10.	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Re-certified in Mar 2018	ASA-03: 30 % remote audit conducted in January 2021. 70% onsite audit completed in April 2021.	No outstanding issues
11.	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and Bimbingan 2	Oct 2012	Re-certified in July 2018	ASA-03: 30 % remote audit conducted in February 2021. 70% onsite audit completed in March 2021.	No outstanding issues
12.	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang 2, Leepang 3, and Leepang 4	Sept 2013	Re-certified in December 2018	ASA-03: audit completed in November 2021	No outstanding issues
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 (Outgrowers & Smallholders)	Planned - 2018	Certified in July 2018	ASA-03 audit completed in April 2021.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
14.	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 17 (Outgrowers & Smallholders)	Dec 2017	Certified in May 2018	ASA-03 audit completed in March 2021.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
15.	IOI – Pelita, Sarawak	Sejap and Tegai	Planned - TBC as it is under the	Uncertified Unit	IOI – Pelita (Sarawak) is in the resolution process (under RSPO CP)	Stage 3: Negotiations for Final Settlement As soon as the Movement Control Order (MCO) was lifted, IOI Pelita held the second round of negotiations with all eight



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
			resolution process			communities, one at a time, on 23-25 September 2021. Similar to the first round of negotiations, the meetings were observed by RSPO and other relevant stakeholders such as the Sarawak State government representatives. Due to Covid-19 travel restrictions some participants had opted to join the process via Zoom. The meetings were videotaped and recorded. All eight communities provided their response to IOI Pelita's
						settlement offers. Long Jegan community made two requests for the Sarawak State Government:
						1) to provide reassurance that the excised land will not be given to anyone else but the 8 community groups participating in the resolution process, and
						to appointment of facilitator for the process of dividing the excised land among the community groups.
						The eight community, LTKB, asked IOI Pelita to excise 300 ha of IOI Pelita planted land (the land IOI Pelita keeps) and return it back to LTKB. This, however, is legally impossible. IOI Pelita is a leaseholder and it can only surrender the land to the Sarawak State Government. This fact was explained to the LTKB community but the community stood firmly by its demand.
						As soon as the 2nd round of negotiations ended on Saturday, September 25th, IOI Pelita, Dr Ramy Bulan, and all government agencies participating in the negotiations recognized the need to address Long Jegan's concerns and came up with a detailed action plan aimed at providing all communities with more clarity and reassurance as to how the



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						Sarawak
						State Government will handle the question of land titling and which agency will play a facilitation role and help communities divide the excised land among themselves.
						In October 2021, IOI Pelita held several meetings with the Sarawak State Government representatives to address communities' remaining concerns regarding the status of the 4,615 hectares of land that IOI Pelita agreed to surrender.
						An inter-governmental meeting held on 2 December 2021 decided that Resident of Miri Office, acting on behalf of the Sarawak State Government, will meet each affected community to:
						1) inform them that the land surrendered by IOI Pelita will be gazetted as communal land under Section 6 of the Land Code, with all 8 communities as trustees,
						2) ask for communities' consent to allow a licensed surveyor to conduct a survey of the excised land as it is the necessary step for publishing the gazette,
						3) reassure them that the survey will take into account the results of the Community Participatory Mapping conducted by CICOM, explain that it will be entirely up to the communities how they divide the gazetted land among themselves.
						Progress on Stage 2: Community Participatory Mapping
						Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping,



_	1		1	1				
No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Multiple	Information on Minimum Requirer Management Units, Clause 4.5 ion Systems for Principles & Criter	.1 RSPO
						communitie 2020, six of done. Unfo reached Sa		mid-March eir surveys s outbreak Movement
						Complaints System	Obatic Of Completes: Salarini New Completes IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)	(Respondent)
							Local Community of Long Teran Kanan & NGO (Grassroots)	(Complainant)
							COMPLAINT PROGRESS	
							COMPLAINT BACKGROUND	
						Complaint Reference	NA	
						Status	Investgation	
						Respondent	IOI PELITA PLANTATION SON BHD (a subsidiary of IOI Corporation Berhad)	
						Complainant	Local Community of Long Teran Kanan & NGO (Grassroots)	
						Date Complaints Submi		
						Date Complaints Accept		
						Membership Sector	Processors and / or Traders	
						Location of Complaint Region / District / Provi	Malaysia Noe Miri. Sarawak	
						Summary of the Compli		
							Land conflict. Of Group's certification process for new certifications auspended in 14411. Both parties in a Mediator has been engaged inneuty the REPO Despuis Entirement Facility, Mediators proc Mediator. This stage would map the disputational process interesting the parties are new Mediation. This stage would map the disputational process process process and sense of the certification and process of the reputation states for the certification and excellent process and the certification and the cert	cess Stage 1 began in sent to Participate in a inticipate in the mediation



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Multiple	Information on Minimum Requirements for Management Units, Clause 4.5.1 RSPO on Systems for Principles & Criteria
							COMPLAINT UPDATE
						DATE	UPDATE DOCUMENTS
						15 Dec 2021	Pending update on negotiations.
						29 Sep 2021	Pending report from Complaints Desk and deliberation by the CP.
						25 Aug 2021	Pending report from the Complaints Desk.
						28 Jul 2021	The Respondent has invited the RSPO Secretariat to participate in the second phase of negotiation and witness the process of the signing of the settlement agreement by the communities.
						23 Jun 2021	The Complaints Desk had a meeting with representatives of the Respondent. The Respondent have also forwarded to the Complaints Desk some supporting documents. They are currently being reviewed by the Complaints Desk.
						25 May 2021	The Secretariat's review is underway. The Secretariat to reach out to the Respondent on updates.
							d updated progress of this issue could be access e link below;
						(a) IOI Pel	ita Land Dispute Resolution Plan
						(b) <u>Current</u> <u>Process</u>	t progress on IOI Pelita Land Dispute Resolution
						(c) <u>https:/</u> <u>Categor</u>	/www.ioigroup.com/Content/MEDIA/M Media?
						(d) RSPO (Case Tracker – IOI Pelita Status of Complaints
						(e) IOI Pel	ita & Stakeholders Reaching a Breakthrough
						. ,	udit for Sejap Estate have been completed in
						November2	
16.	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned - 2022	Uncertified Unit	RSPO Stage 1 was conducted in September 2019.	complaint work with t	nplaints Panel (CP) has officially closed the case on 12 October 2018. IOI will continue to the RSPO Investigate and Monitoring Unit on the ation of its Action Plans to ensure continuous

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.
						On 15 th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."
						IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."
						Further and updated progress of this issue could be access through the link below;
						(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS
						(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						RSPO Soundtable on Sound of Companies Sound Feel of Companies Sound O'Companies Sound O'Companies Sound O'Companies Sound O'Companies Sound O'Companies Sound O'Companies PT Subsess Karrya Sawrit (PT SKS), PT Berkat Nababi Sawrit (PT SNS), PT
						Burni Sawit Sejahara (PT BSS), PT Sawit Nabat Agro (PT SNA) (a subsidiary of IOI Corporation Berhad) (Respondent) Alderwironment (Complainant)
						COMPLAINT PROGRESS
						COMPLAINT BACKGROUND Complaint Reference NIA
						Status Case closed PT Sakes Karya Seel (PT SKS): PT Seels (PT SKS): PT Seels (PT SKS): PT Seel Sejakhra: PT SKS): PT Seel Natid Aya (PT SNA) is subsidiary of CC Corporation Sethad) Complainant Althority consent
						(c) RSPO Post-Complaints Monitoring
						RSPO Nucleita de basearie de Cartification Sealancies Para MARCT MARCE M
						## 1590 / Investigation & Ministrating that BMLE / Ministrang / Peer Completes Munisping
						Post Complaints Monitoring TITLE CURRENT STATUS PT States Karya Sanit SSKI. PT Silves National Senit SPT SMS. PT States Sanit Seypheres SPT SSSI Admission of ST Senit National Senit SPT SMS. SC CICCUS is subridary of SCI Corporation Service. Case No. COR CO. COLOURS Selections STATE STATES SANITATION OF STATES SANITATION OF STATES SANITATION.
						The Stage 1 of RSPO P&C audit was conducted on 9 th – 12 th September 2019 by BSI
						Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						be conducted in year 2021. The postponement of the main assessment have been communicated and approved by RSPO. In November 2020, PT. SKS internal auidit have been conducted.
						Date of RSPO main assessment audit have been proposed to CB to be conducted in Mid 2022
17.	PT BNS, Indonesia	BNS 1, BNS 2, BNS 3 and BNS 4	Planned - 2022	Uncertified Unit	RSPO Stage 1 audit was conducted in September 2019	RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively. On 15 th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed." IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."



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Tracker – PT BSS, PT SKS & PT. BNS Status
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ukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT mi Sawit Sejahtera (PT BSS), PT Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad) (Respondent)
Aidenvironment (Complainant)
COMPLAINT PROGRESS
COMPLAINT BACKGROUND
N/A
Case closed
PT Suitsies Karya Saerit (PT SKS), PT Berkat Nabell Saerit (PT BNS), PT Burni Servit Sejahtora (PT BSS), PT Saerit Nabeli Agro (PT SNA) (is subsidiary of ICI Corporation Berhad)
Aidenvironment



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						RSPO Newholder in Justice Small Solder Copported Fution Distances: Small Solder Copported Fution Distances: Small Solder Copported Fution Distances Small Sm
						Post Complaints Monitoring TITLE FI Subsections SCHL (IF) Banks Makes Seed FI SCHL (IF) Banks Seed September OF SSL (IF) Banks Makes Seed FI SCHL (IF) Banks Seed September OF SSL (In) Subsection of IF) Seed Makes Approved SSL (In) Collision Subsection of Title Compensation Services College Additional or College College
						The Stage 1 of RSPO P&C audit was conducted on 9 th – 12 th September 2019 by BSI
						Due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. The postponement of the main assessment have been communicated and approved by RSPO. In November 2020, PT. BNS internal audit have been conducted.
						Date of RSPO main assessment audit have been proposed to CB to be conducted in Mid 2022
18.	PT BSS, Indonesia	BSS 1, BSS 2, BSS 3 and BSS 4	Planned - 2022	Uncertified Unit	RSPO Stage 1 was conducted in September 2019	RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						On 15 th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."
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						(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS (b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						PT Sukes Kaya Sawit (PT SKS), PT Berkat Nabati Agor (PT SNA) (a subsidiary of IOI Corporation Berhad) Addenvironment. (Complainant) COMPLANT PRODRESS COMPLANT PRODRESS PR

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						RSPO. In November 2020, PT. BSS internal auidit have been conducted.
						Date of RSPO main assessment audit have been proposed to CB to be conducted in Mid 2022
19.	PT KPAM, Indonesia	Under Development	Planned - 2023	Uncertified Unit	NPP and HCSA was approved in April 2018. Currently under development.	RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:
						RSPO Roundale us hatanable Pain OI Resources Smallholder Engagement Platform Sustainability College RSPO CI
						ABOUT MEMBERSHIP CERTIFICATION SMALLHOLDERS P&C 2018 IMPACT ### RSPO / Certification / New Planting Procedure / Public Consultations
						New Planting Procedure Public Consultations
						IOI Croup - PT. Kalimantan Prima Agro Mandiri New Planning Procedures Public Consultations * 13 April 2018 IOI Group - PT. Kalimantan Prima Agro Mandir has proposed new planting area located in the Sukaramal Village. Kendawangan and Maniris Marka Subdistrict. Ketapanga Regency, West Kalimantan Province. Indonesia. This is the summary report of IOI Group - PT. Kalimantan Prima Agro Mandiri New Planting Assessment is now open for public comments for 30 days as required by the RSPO New Planting Procedures (NPP). COMPLETE COMPLET
						https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?
						HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:
						http://highcarbonstock.org/wp- content/uploads/2018/05/PRR-PTKPAM.pdf



3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were three (3) Critical; three (3) Minor nonconformities and zero (0) Opportunity For Improvement raised. The IOI Gomali POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity				
NCR Ref #	2205750-202205-M1			
Due Date	26/8/2022	Closure Date	17/8/2022	
Indicator & Category (Critical / Minor)	6.2.2 (Critical)			
Statement of Nonconformity:		ble between the contractor ar legal requirements (e.g. Emp		
Requirement Reference:	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.			
Objective Evidence:	Working contract agreement between Contractor (Mega Sensasi Jaya Sdn. Bhd.) which has been appointed as FFB transporter by IOI Plantation Sdn. Bhd. and their workers (ID No: 970522-05-xxxx which has been appointed as lorry driver) does not indicate the working hours, number of days entitle for annual leave and public holidays, medical and other benefits.			
Corrections:	The Contractor (Mega Sensasi Jaya Sdn Bhd) have revised their workers contract agreement according to Employment Regulation 1955 which will be then acknowledged by the workers.			
Root Cause Analysis:	The contractor, Mega Sensasi Jaya Sdn.Bhd, were found to be unclear with the Employment Regulation 1957. Under regulation 5 of the Employment Regulation 1957, there is a list of details of the employment terms and condition that must be stated in workers' contract agreement. Without proper awareness of on the said regulation, the contractor has only stated a simple sentence for the "number of days entitle for annual leave and public holidays, medical and other benefits stipulated under the Malaysian Law" in their workers' contract agreement with the intention to ease the workers understanding on the matter, which has therefore created an ambiguity in interpreting the sentence			
Corrective Actions:	Sustainability team will conduct a training for selected contractors in Gomali Region, which was found has yet to have proper understanding on the details of employment terms and condition which need to be clearly stated in workers contract agreement, as per regulation 5 of Employment Regulation 1955			



Assessment Conclusion:	Major NC close out verification: i) Worker's contracts have been revised and according to Employment Act 1955. Verified signed contract between Mega Sensasi Jaya Sdn Bhd and acknowledged by the said worker on 23/7/2022.	
	ii) Training for contractors was carried out on 22/7/2022 and attended by 9 contractors (FFB, CPO, PK transporter). Interview with 1 (one) of the contractor, Mr Tan form Mega Sensasi Jaya Sdn Bhd has confirmed on the training attended and awareness on Employment Act 1955.	
	Implementation of corrective action taken was found to be sufficient to close the NC on 17/8/2022. Continuous implementation will be further verified in the next assessment.	

Non-conformity			
NCR Ref #	2205750-202205-M2		
Due Date	26/8/2022	Closure Date	17/8/2022
Indicator & Category (Critical / Minor)	2.1.1 (critical)		
Statement of Nonconformity:	Evidence of compliance wa	s not effectively demonstrated	d
Requirement Reference:	The Unit of Certification co	mplies with legal requirement	S
Objective Evidence:	Gomali POM		
	The mill has conducted audiometry test for 2021 on 08 - 14/07/2021 at Segamat Clinic for 117 of its workers. Based on the results provided by the clinic, 52 workers were classified under Standard Threshold Shift and stated to be retests within 3 months (90 Days). Nevertheless, the mill conducted the retest on 03 - 22/01/2022. The retest has exceeded 82 days (172 days) from the 3 months supposed time frame.		
	Bukit Serampang Estate		
	Schedule Waste (SW) Recent Disposed Previous Disposal eSwis First Generation No of days from last disposal 104, 305,410 11/04/2022 02/09/2021 30/09/2021 192. It was identified that the estate has exceeded the validity period of SW storage as stipulated in the Environmental Quality Act 1974 (Act 127), prior to disposal.		
	Reference: "Environmental Quality (Scheduled Wastes) Regulations 2005; PU(A) 294/2005; Regulation 9-Storage of Scheduled Wastes; No.5 – Any person may store schedule wastes generated by him for 180 days or less after its generation provided that: The quantity of scheduled wastes accumulated on site shall not exceed 20 metric tonne.		
	Based on the above issues, there was no evidence to show the existing monitoring mechanism effective to ensure compliance to legal requirements.		



Corrections:	Gomali POM Audiometric re-test for the 52 workers has been conducted from 03rd to 22nd January 2022. The report has been received from OHD on 15th February 2022.		
	Bukit Serampang Estate		
	l		
	Bukit Serampang Estate management has already disposed the scheduled waste on 11/04/2022.		
Root Cause Analysis:	Gomali POM		
	There is no mechanism or internal SOP to monitor the audiometric test programme will be done within the stipulated time, as per legal requirement for the retest of the respective workers under Temporary Standard Threshold Shift Category.		
	Bukit Serampang Estate		
	Bukit Serampang Estate had initiated the process for scheduled waste disposal through DOE licensed contractor, Kualiti Alam Sdn Bhd, on 16th February 2022. At that point of time, the period from the date of first generation of the scheduled waste was only at 139 days. However, contractor sent an email to inform us that they cannot dispatch their lorry to BS estate as we did not meet the contractor's quota of 18 pallet for collection. However, on 25 March which is 176 days from generation date, they agreed to collect our 7 pallets but the date will be 11th April 2022 which will be 193 days from generation date. As the estate had no choice, they had to agree to this arrangement as engaging a new contractor would take a longer time.		
	The current SOP (SOP: IOI-OSH 3.2.2) for Scheduled Waste handling currently does not specify a properly guided timeframe from the initial process of engagement with the disposal contractor until the whole process of disposal completed.		
	The current SOP also does not able to provide guideline on what action to be taken in a situation where the disposal cannot be completed within the stipulated 180 days due to unforeseeable and unexpected circumstances.		
Corrective Actions:	Gomali POM		
	SOP of Management of Occupational Noise Exposure and Hearing Conservation will be established.		
	2) Training for Mill Management on the newly established SOP.		
	3) Mill management to update safety and health annual program with Hearing Conservation Program (HCP) and implement accordingly.		
	Bukit Serampang Estate		
	The following actions will be carried out:		
	 The existing SOP (SOP: IOI-OSH 3.2.2) document will be revised and updated to include a guided timeframe (about 120 days or sooner) for the commencement of the process to arrange for the disposal of scheduled waste disposal. 		



	2) The SOP will also be revised to include guidance of the steps to be taken if
	the disposal cannot be disposed on time, which will include request for period extension for the disposal from DOE.
	3) The SOP will be revised to include a clause to consider replacing the contractor if they do not comply with regulations
	4) SW disposal will be discussed during Environmental meeting as part of the monitoring for the disposal of SW.
	5) Training on the updated SOP will be given by HSE/Sustainability Team to the OC's management team personnel in charge to keep them informed and aware on the latest update & changes in the document.
	6) OCs management shall take measure in ensuring the disposal is accordance with updated SOP by giving trainings to their respective personnel in charge of the SW handling.
Assessment Conclusion:	Major NC close out verification:
	Gomali POM
	i) OSH annual plan updated on 29/7/2022 has included related safety and health program with Hearing Conservation Program (HCP)
	ii) SOP of Management of Occupational Noise Exposure and Hearing Conservation was established and include process flow on the management of the said SOP. Document reference, IOIPSSB/HSE/FM/01 rev:0 dated 1/6/2022.
	iii) Training for the management team was given by Sustainability team on 14/7/2022. Evidence of training carried out and attendance available for verification. Interview with the person in charge has confirmed on the understanding of SOP and related process for improvement.
	Bukit Serampang Estate
	 i) SOP (SOP: IOI-OSH 3.2.2) revision 3, dated 7 June 2022 has been updated to include a guided timeframe (about 120 days or sooner) for the commencement of the process to arrange for the disposal of scheduled waste disposal. Related ii) Process flow, document reference, IOIPSSB/HSE/FM/02 rev:0 dated 1/7/2022. Implementation of the process can be seen from date of generation up to date
	of disposal. Other related requirements on extension and registered contractor were also updated in the SOP.
	iii) SW disposal discussed in the environmental meeting on 20/7/2022 which attended by management team and EPMC @Environmental Performance Management Committee. Internal briefing/training was also given during environmental meeting for those attended. Minutes of meeting available for verification.
	iv) Training on the updated SOP was given by HSE/Sustainability Team was carried out on 14/7/2022. Interview with the person in charge has confirmed on the understanding of SOP and related process to be obliged with.
	Implementation of corrective action taken was found to be sufficient to close the NC on 17/8/2022. Continuous implementation will be further verified in the next assessment.



Non-conformity				
NCR Ref #	2205750-202205-M3			
Due Date	26/8/2022	Closure Date	17/8/2022	
Indicator & Category (Critical / Minor)	7.8.1 (critical)			
Statement of Nonconformity:	Water Analysis was not dor	ne for Domestic Water used fo	or consumption.	
Requirement Reference:	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:			
	a. The unit of certification does not restrict access to clean water or contribute to pollution of water used by communitiesb. Workers have adequate access to clean water.			
Objective Evidence:	Bkt Serampang Estate	access to clean water.		
	Water usage is monitored on a half yearly basis by the estate. Previously water used for consumption was treated in the estate using the water source available. The latest National Drinking Water Quality Standard (NDWQS) was conducted on 26/11/2021. The results indicated that certain specifications did not comply with the NDWQS. Hence, the estate could not justify that the water used for domestic consumption complies with NDWQS. Hence, a major non-conformity was raised due to recurrence of minor NC in the same indicator as per RSPO P&C System November 2020.			
Corrections:	Bukit Serampang Estate management has already made arrangement for the resampling of the domestic water by sending it to an accredited lab.			
Root Cause Analysis:	The previous Sustainability Staff who was assigned by Bukit Serampang Estate management had recently resigned. The previous Sustainability Staff who was assigned by Bukit Serampang Estate management had recently resigned. Thus, the follow up of the report and result of the domestic water analysis were not done accordingly.			
	There is also no proper guidance and mechanism in place concerning the course of actions to be taken if the water quality results indicated that certain specifications did not comply with the required standard.			
Corrective Actions:	 The water management plan 2022 for Bukit Serampang Estate will be updated to include the actions to be / has been taken by the estate management whenever the drinking water analysis do not meet the specifications. Estate manager to immediately brief the estate management on the revised action plan. 			
Assessment Conclusion:	NC close out verification:			
, assessment dentities	i) Arrangement for retest dated 9/6/2022 was verified. Refer to report, BSE/Water/June2022/01 and certificate of analysis, LP/0622/5781(1 & 2).			



ii) Water management plan for 2022 (date review 19/7/22) was made available for verification. The plan has included troubleshooting guidelines for (off-spec) and action to be taken for rectification.
iii) Training was carried out for estate team on 19/7/2022. Interview with the person in charge has confirmed the understanding and awareness of the revised plan.
Implementation of corrective action taken was found to be sufficient to close the NC on $17/8/2022$. Continuous implementation will be further verified in the next assessment.

Non-conformity				
NCR Ref #	2205750-202205-N1	Issued Date	27/5/2022	
Due Date	26/5/2023	Closure Date	Next annual surveillance assessment	
Indicator & Category (Critical / Minor)	4.2.3 (minor)			
Statement of Nonconformity:	Process to keep parties to a grievance informed of its progress, including against agreed timeframe and the outcome was not effective and communicated to relevant stakeholders.			
Requirement Reference:	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.			
Objective Evidence:	Gomali POM Based on interview with NUPW head and other JCC representatives, the have a few complaints which commonly shared between estate and mill. Issues related to road condition and repairs, waste handling and road safety were highlighted. These issues were trailed further in the complaints/green book and JCC's 2022 meeting minutes. None of the said issues recorded hence progress, agreed time frame and outcome was not available for verification. Bukit Serampang Based on interview with neighboring village representatives (Kg Sengkang), they have highlighted on the replanting activities which is still in progress. Issues related to small/bottleneck drain and resulting to overflow and flooding to the some of the villager's farm are among their concern. Investigation of the said issue was not yet initiated hence validity of complaint was not able to be further verified.			
Corrections:	Gomali POM A meeting will be conducted with the NUPW head and other JCC representatives by the mill management to update them regarding current status on their grievances. Bukit Serampang Estate A physical meeting was conducted on 30th May 2022 between estate management and the representatives of Kg Sengkang to request for more information (in writing) on their appeal for assistance for flood mitigation measures in their own			



	land, which was highlighted to the auditors. Bukit Serampang estate management requires this information for their submission of the details of the issue to IOI HQ, for HQ approval to assist on this matter. Follow up measures will be taken upon getting approval from HQ.
Root Cause Analysis:	Gomali POM
	The workers already highlighted the following issues during internal verification audits by Sustainability department. Mill management have already resolved the issues but they have yet to communicate it's progress and outcome to the workers. As for the records, since this grievance was raised through interview session, the details of the issue was only recorded in the interview session records. The actions to be taken are also recorded in that documents.
	However, the format of the record was not established in a way to ensure proper flow of grievance handling will be followed (e.g. complainant acknowledgement, person in charge, etc.). As all issues are recorded and addressed as prompt as possible, operating centers felt that consolidating the comments in another documents will only be duplicating the action taken.
	Bukit Serampang Estate
	Due to Covid 19 pandemic, estate management only distribute stakeholder consultation form and stakeholder interview form to obtain feedback / information / grievances from the stakeholders regarding estate activities that may give impact to them including replanting. As there are no feedback / grievances from the village representative's (Kg Sengkang) feedback form, the estate management thought there are no issues from villagers.
Corrective Actions:	Gomali POM & Bukit Serampang Estate
	1) A memo will be distributed to all operating centers in the region to remind them to ensure that all grievances raised by employees and stakeholders are documented in the Grievance book / Social mitigation plan. The format given Grievance book / Social mitigation plan will ensure a proper flow of grievance handling, as per the company grievance mechanism.
	These grievances shall then be addressed and the relevant stakeholders shall be informed regarding the outcome and agreed timeframe (if the grievance can be resolved). If the grievance can't be resolved / addressed / attended, the complainant shall be informed with appropriate explanation. The complainant shall then be requested to acknowledge the decision.
	Stakeholders shall be updated on the progress of actions taken to settle issues that can be settled. Once the issues are settled, the relevant stakeholders shall be requested to acknowledge that the issues have been resolved amicably.
	Complainants are required to contact Management if they are unsure of the progress of complaints made or if they have any new grievances
	2) Stakeholders, management and employees are given briefing/training on IOI's grievance procedures during stakeholders' meetings, daily muster, posters on notice boards, linesite etc.
	Grievance procedures includes Grievance book, ECC/JCC meetings, Hotline, Grievance App (IOI Mesra), Whistleblowing, internal and external stakeholder meetings, communicating directly to operating center management etc.



Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will
	be further verified in the next assessment.

Non-conformity				
NCR Ref #	2205750-202205-N2			
Due Date	26/5/2023	Closure Date	Next annual surveillance assessment	
Indicator & Category (Critical / Minor)	7.3.2 (minor)			
Statement of Nonconformity:	Proper disposal of waste m	aterial was not effe	ctively demonstrated	
Requirement Reference:		Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	During the visit to the Gomali POM line site, it was found that scheduled waste items such as 2T Lubricant containers have been inappropriately disposed into the field areas surrounding the housing complex. Hence a minor nonconformity was raised.			
Corrections:	Immediate linesite cleaning have been done on 23.05.2022 and all scheduled waste items have been collected and stored in SW store.			
Root Cause Analysis:	Gomali POM linesite and Gomali Estate is sharing the same linesite compound. Estate had already done line site inspection by HA on weekly basis and trainings were given by management on waste management, waste segregation, and schedule waste to person in charge and targeted workers according to training need analysis (TNA) However, there are lack of awareness and reminders given to workers in which			
	resulting in workers disposing waste not according to procedure despite training on waste management, waste segregation, and schedule waste had been done. Workers use 2T for their motorcycle and does not aware on the correct way of disposing schedule waste (2T lubricant containers)			
Corrective Actions:	The following actions will b			
	Awareness and reminders will be carried out frequently to all workers regarding waste management and disposal			
	2) Trainings on waste management, waste segregation, and schedule waste will be given to all workers and the trainings material will be updated to ensure comprehensive understanding to workers			
	3) Training need analysis will be updated to address all workers instead of only general workers (line site sweeper)			
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.			



Non-conformity			
NCR Ref #	2205750-202205-N3	Issued Date	27/5/2022
Due Date	26/5/2023	Closure Date	Next annual surveillance assessment
Indicator & Category (Critical / Minor)	3.3.3 (minor)		
Statement of Nonconformity:	Records of monitoring and	any actions taken are i	maintained and available.
Requirement Reference:	Bukit Serampang Estate Bukit Serampang Estate have conducted assessment of incoming and outgoing water course (Date: 20/01/2022; Report Number: BSE/10/03/2022) and domestic water (Date: 26/11/2021) by sending samples of the water to the accredited lab/company lab for water analysis. The estate has received the results of the lab analysis. The results indicated that the results did not meet the specifications. There was no evidence of action taken post receiving the non-conforming results.		
Objective Evidence:	Records of monitoring and any actions taken are maintained and available.		
Corrections:	 Domestic water: Estate management had sent re-sampling of the domestic water to an accredited lab on 25/05/2022. Please refer appendix 1 for the domestic water result. Stream water analysis: As the off-spec water is due to low precipitation in the estate, RC have been contacted to collect the water sample after the drought season end. Please refer to Appendix 2 for confirmation email from RC on the date of WQI re-sampling. 		
Root Cause Analysis:	The water management plan for domestic and oil palm cultivation did not address the action plan or management plan if the drinking and river water analysis result did not meet the required specification. Hence, estate management does not have any guidance pertaining the next action that shall be taken if the result is not comply with standard.		
Corrective Actions:	The water management plan 2022 has been updated to include the action that shall be taken by estate management if the drinking or river water analysis do not meet the specifications. The amended water management plan has been sent to Bukit Serampang Estate to replace the previous version. Please refer to Appendix 3 and Appendix 4 for revised domestic water management plan and revised water management plan for oil palm cultivation of Bukit Serampang Estate respectively. Estate manager to conduct briefing session for his estate management team on the revised action plan.		
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		



Opport	Opportunity for Improvements		
OFI#	Description		
OFI 1	Nil		

Positive Findings		
PF#	Description	
PF 1	Good cooperation given by sustainability and site management team	

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity	Non-conformity			
NCR Ref #	2076734-202106-N1			
Due Date	1/7/2022 Closure Date 27/5/2022			
Indicator & Category (Critical / Minor)	2.2.2 (Minor)			
Statement of Nonconformity:	Contracts contain specific cla legal due diligence evidence v			
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.			
Objective Evidence:	 3 labour agencies contract/agreement reviewed; India (Vazir Enterprises), date signed 26 January 2018 Nepal (Sky of The World Pvt. Ltd), date signed 16/10/2019 Indonesia (PT Tekad Jaya Abadi (Cabang Lombok Timur)), date signed 01/11/2017 None of the above contracts stipulate the clause on meeting legal requirements in Malaysia. Furthermore, a legal due diligence process by HRD was carried out on February 2020 using recruitment agencies risk mapping. 5 labour agencies were evaluated however evaluation criteria on meeting applicable legal requirements in Malaysia was not included in the risk mapping criteria. 			
Corrections:	All our contracts/agreements with our recruitment agencies will be revised to include the clause on compliance to legal requirements in Malaysia and the workers country of origin and all the recruitment related clauses found under indicator 6.1 in the latest RSPO MYNI. The recruitment agencies risk mapping for due diligence process will be revised accordingly by including "Compliance with applicable legal requirements in Malaysia" and recruitment related clauses found under indicator 6.1 in the latest RSPO MYNI.			
Root Cause Analysis:	The CH was unclear about the requirement to revise the foreign workers recruitment procedures in line with the updated RSPO MYNI 2019, and the CH felt that their 2017 recruitment procedures which is quite comprehensive was sufficient. Therefore, the			



	CH failed to revise the foreign workers recruitment procedures, contract and risk mapping accordingly.			
Corrective Actions:	 The following actions will be carried out: IOI HQ/HR shall be requested to revise the existing foreign workers recruitment guidelines/ procedures, contracts and due diligence risk mapping to include applicable legal requirements in Malaysia and the new requirements found under Indicator 6.1 in the latest RSPO MYNI dated May 2021 IOI HQ/HR shall take measures to keep abreast on changes to recruitment related requirements by checking with various sources like Malaysian and Workers' countries laws, RSPO, MSPO, ISCC P & Cs, ILO etc HR shall take measures to strictly monitor recruitment agents on the implementation of these revised requirements 			
	The above revised documents will be used by HR to conduct briefing to recruitment companies before contracts are signed. Records of briefing and attendance shall be available upon request			
Assessment Conclusion:	ASA2_1 verification: Interview with HR department was carried onsite to verify the implementation of corrective action taken. Verification of revised contract/agreement with the recruitment agencies were evident and all required clause as to comply with applicable laws in Malaysia/country of origin and other requirements (RSPO, MSPO, ISCC P & Cs, ILO etc). Corrective action was found to be effective thus the previous minor NC is closed on 27/5/2022. Continuous implementation will be further verified in the next assessment.			
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable			

Non-conformity					
NCR Ref #	2076734-202106-N2	Issued Date	2/7/2021		
Due Date	1/7/2022	Closure Date	27/5/2022		
Indicator & Category (Critical / Minor)	7.8.1 (Minor)				
Statement of Nonconformity:	Water Contingency Plan for Domestic Water Usage was not implemented.				
Requirement Reference:	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. 7.8.1b Workers have adequate access to clean water.				
Objective Evidence:	The Water Contingency Plan states that the management will ensure the continuity of quality water supply by: 1. Purchasing of water from the local water service provider, Syarikat Air Johor, 2. Diversion of water from Bukit Serampang Estate using alternative piping and				



	water tanks.
	Sagil Estate
	The renewal of license to supply water for domestic use has been denied by the authority due to the water sampling results showing non-conforming results. The management have taken necessary steps to obtain renewal of the license as verified during the assessment. Nevertheless, efforts to ensure the continuity of water supply as stated in the Water Contingency Plan was not implemented.
Corrections:	Sagil Estate has managed to make arrangements with Bukit Serampang for temporary water supply to Sagil estate through portable water tanks. Sagil Estate is currently sending tanks to collect water from Bukit Serampang estate before supplying to Sagil Estate residents.
Root Cause Analysis:	The water contingency plan which states that the CH will either purchase water from Syarikat Air Johor or divert water from Bukit Serampang Estate using alternative piping and water tanks was only prepared on 30th June 2021. As the CH is in the process of applying for approval from both parties, it caused a delay in the implementation of the contingency plan.
Corrective Actions:	Water Management Plan preparation procedure will be introduced as following: a. Water management plan questionnaire which are including the contingency plan shall be sent by operating centre prior to the WMP preparation and must be return back to the Sustainability team within one weeks
	 Sustainability team shall prepare the complete Water Management Plan after receive the answered questionnaire. The completed water management plan shall be distributed to all operating centre within 2 weeks.
	 Respective operating centre shall review the water management plan. If has any amendment required, operating centre shall revert back to Sustainability team within 3 days.
	d. If within 3 days the Sustainability team doesn't receive any feedback from the estate, the management plan will be considered accepted by the operating centre
	e. The management plan shall be effective from the date of receiving the Water Management Plan
	f. Operating centre must strictly follow the management plan without fail.2. Sustainability team will check the implementation of the management plan during the annual internal audit.
	Head of operating centre shall ensure the management plan communicated well to the assistants and management staffs through environment meeting will be held once in every 3 months.
Assessment Conclusion:	ASA2_1 verification:
	The previous minor NC was not effectively closed based on current site condition. The estate could not justify that the water used for domestic consumption complies with NDWQS. Due to recurrence of NC in the same indicator, hence the previous minor NC escalate to major NC based on RSPO P&C System Nov 2020.
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable



Opport	Opportunity for Improvement			
OFI#	Description			
OFI 1	OFI Statement:			
	Verification / Follow-up actions:			
	Not applicable			

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
SH-01	Major	4.4.1	31/05/2019	Closed on 30/08/2019
AL-01	Major	4.4.2	31/05/2019	Closed on 30/08/2019
SH-02	Major	5.2.1	31/05/2019	Closed on 30/08/2019
JMD-01	Major	6.1.3	31/05/2019	Closed on 30/08/2019
JMD-02	Major	6.5.1	31/05/2019	Closed on 30/08/2019
1929856-202006-M1	Critical	6.6.1	03/07/2020	Closed on 15/09/2020
1929856-202006-M2	Critical	6.4.2	03/07/2020	Closed on 15/09/2020
1929856-202006-M3	Critical	2.1.1	03/07/2020	Closed on 15/09/2020
1929856-202006-M4	Critical	3.6.1	03/07/2020	Closed on 15/09/2020
1929856-202006-N1	Minor	3.5.1	03/07/2020	Closed on 16/07/2021
1929856-202006-N2	Minor	6.5.4	03/07/2020	Closed on 16/07/2021
1929856-202006-N3	Minor	3.4.2	03/07/2020	Closed on 16/07/2021
1929856-202006-N4	Minor	7.3.1	03/07/2020	Closed on 16/07/2021
1929856-202006-N5	Minor	7.12.7	03/07/2020	Closed on 16/07/2021
2076734-202106-N1	Minor	2.2.2	02/07/2021	Closed on 27/05/2022
2076734-202106-N2	Minor	7.8.1	02/07/2021	Escalated to major NC
2205750-202205-M1	Major	6.2.2	27/05/2022	Closed on 17/08/2022
2205750-202205-M2	Major	2.1.1	27/05/2022	Closed on 17/08/2022
2205750-202205-M3	Major	7.8.1	27/05/2022	Closed on 17/08/2022
2205750-202205-N1	Minor	4.2.3	27/05/2022	"open"
2205750-202205-N2	Minor	7.3.2	27/05/2022	"open"
2205750-202205-N3	Minor	3.3.3	27/05/2022	"open"



3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss IOI Gomali POM 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.

Stakeholders contacted				
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)		
Union	Uganeshwaran Nesh/ National Union Plantation workers	Online meeting		
Neighbouring Estate	N. Suresh/ Sungai Pertang Estate	Face to Face		
Contractor	Kannapathi A/L Manikam	Face to Face		
Governmental Department	Zachary Adams/ Balai Polis Karak	Face to Face		
Local communities	Khairi Daud - JKKK Kampung Tepoh, Karak	Face to Face		
Internal	Gender representative/gender committee	Face to Face		

Stake	eholders comment
1	Feedbacks: Uganeshwaran Nesh/ National Union Plantation workers
	Mr Uganeshwaran is the secretary of National Union Plantation Workers for Pahang State. He mentioned that frequent communication and consultation with the estate manager under IOI group has been done directly through meeting and phone call . He also mentioned that high participation from IOI Group workers in NUPW is very satisfactory. IOI group support any activities conducted and persuade any workers to join any Union as per mentioned in their own policy.
	Audit Team verification and response: There is no further verification required by the audit team. The management noted with the respond and will try to improve in the future.
2	Feedbacks: N. Suresh/ Sungai Pertang Estate
	Mr N. Suresh is the manager of Sungai Pertang Estate under Sungai Pertang Group for nearly 10 years. Interview with confirmed that good relationship has been established by the management with smallholder surrounding the estates. Latest land survey has been conducted in year 2012 during the last replanting



	and there are no issues of land. Demarcation of boundary markers done by both parties and can be clearly sighted. He also mentioned that next resurvey will be done in year 2023 during next replanting. N. Suresh/
	Audit Team verification and response: There is no further verification required by the audit team. The management noted with the respond and will try to improve in the future.
3	Feedbacks: Kannapathi A/L Manikam
	Mr Kannpathi has been appointed as grass cutting contractor since last 20 years. Contract agreement detailing all term has been signed by both parties and confirmed that stakeholders understand content of the agreement. Payment has been made normally with period around 7-10 days after invoice submitted
	Audit Team verification and response: There is no further verification required by the audit team. The management noted with the respond and will try to improve in the future.
4	Feedbacks: Worker's Representative/Gender Committee
	Sample of local and foreign workers has been interviewed. As per interview, there is issues has been raised where policy and procedure has been communicated to all workers. Salary payment is in line with local regulations. All workers interviewed satisfied with accommodation provided by the company.
	Audit Team verification and response:
	Management team will keep update on any update of legal requirement to ensure that all workers will be paid compliance with legal requirement.
5	Feedbacks: Sergeant Zachary Adams - Karak Deputy Chief Police
	No issue or complaint received for Bukit Dinding Estate operation received from communities so far. However, Karak police expressed their concern to make immediate report if there are any criminal activities or suspects within the estate area
	Audit Team verification and response:
	Management team will keep date on any criminal activities or suspect identified within estate area.
6	Feedbacks: Khairi Daud - JKKK Kampung Tepoh, Karak
	Appreciate for the post flood contribution from Bukit Dinding Estate to the villagers. No other issue raised
	Audit Team verification and response:
	The management will continue to contribute on local and community development.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Pamol Plantations Sdn. Bhd. (Unilever Group)	2003	11,673.27	Yes	No	Yes, ownership changed due to estate bought over by IOI Corporation Berhad on 17/01/2003
Notes: -					

Previou	Previous land owner / user comment	
	Feedbacks:	
	Audit Team verification and response:	



3.5 Impartiality and conflict of interest

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



Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Agos Bin Atan
Company Name: BSI Services (M) Sdn Bhd	Company Name: IOI Plantation Services Sdn Bhd
Title: Lead Auditor	Title: Senior Manager, Sustainability
Signature:	Signature: (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.)
Date: 24 th August 2022	Date: 30th August 2022



Appendix A: Summary of Findings

Criterio	n / Indicator	Assessment Findings	Compliance
Princip	e 1: Behave ethically and transparently		
	n 1.1: The unit of certification provides adequate information to relevant ate languages and forms to allow for effective participation in decision makes		SPO Criteria, in
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	Gomali POM certification unit is able to demonstrate that documents specified in the RSPO P&C are made available to the public. The publicly available documents are available at the office notice board at Mill and every estate, and inside the office which can be assessed by stakeholders if they wish to. These include documents related to environmental, social and legal issues such as: Company policies, including Sustainable Policy which contains policy on protection of human rights defenders, Land titles High Conservation Value and High Biodiversity Value document summaries Details of complaints and grievances Negotiation procedures Business unit organizational structure Public summary of certification assessment report Negotiation procedures Meeting of minutes with stakeholders, safety and welfare committee meetings Continuous improvement plans The company policies are also shared with the stakeholders during stakeholder meetings held as follows:	Complied

		 Gomali POM has carried out stakeholder meeting on 1/4/2022. For internal stakeholder session, the latest meeting was carried out on 12/4/2022. Regent Estate stakeholder meeting was carried out on 12/5/2022. For internal stakeholder, the session was carried out on 15/4/2022. 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the company policies are available in dual language, i.e., Bahasa Malaysia and English. Information requested by government department stakeholders are prepared in Bahasa Malaysia. Refer to Indicator 1.1.3 below.	Complied
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	Records of requests for information and responses are duly maintained and verified during the surveillance audit. Reviewed were requests for information and the responses: SJK(T) Ladang Regent – Requested to use estate field for co-curricular activities, grass cutting, road traffic control for school children safety. Action – Estate has arranged for 2 rounds of grass cutting per month. AP assigned to SJK (T) Ladang Regent to monitor movement of vehicle in front of the school area.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	IOI Corporation Berhad has developed Stakeholder Request Procedure for Corporate Level and Estate Level and Grievance Procedure (Staff Grievances Standard of Procedure). The flowchart has detailed out the process of request by the stakeholders. Stakeholders can access to www.ioigroup.com , call IOI Group General Line or write formal letter to Head Office of IOI if they have any requests or complaints. The stakeholders need to be informed of outcome within 5 working days. The relevant procedures for consultation and communication are documented; a. Stakeholder Request Procedure Flowchart (SOP 6.11; Rev 1B;	Complied

		dated 28/12/2020 b. Stakeholder Company 1A; dated 17/01/2020 c. Negotiation Procede There are 2 options for either face to face meet form named "Borang"	plaint Procedure Flower 2017) dure (SOP 6.11; Rev 1 consultation during the eting or by sending our	A; dated 17/01/2017). his COVID19 pandemic t stakeholder feedback	
		relevant stakeholders. incorporated in the soc	All feedbacks received ial management plan	I with be reviewed and for further action.	
		Nominated person in chemill. Appointment lett Serampang Estate. Conduring the stakeholder stakeholders.	er dated 1/9/2020 with mmunication of the pro	was verified at Bukit ocedure has been done	
		Estates	Internal stakeholder consultation	External stakeholder consultation	
		Kuala Jelei Estate	27/04/2022	21/04/2022	
		Bukit Dinding Estate	11/04/2022	11/05/2022	
		Bahau Estate	14/04/2022	21/04/2022	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Each unit within Gomal own list of stakehold government agencies of Department, Department and Health, India Commissioner, Nepal a are neighbouring e canteen/shop operator	ders. The stakeholde such as the Labour Dep ent of Environment, High Commissioner and Indonesian Embass estates, neighbouring	partment, Immigration Department of Safety r, Bangladesh High sies, etc. Also included g villages, schools,	Complied

		for each stakeholder and their nominated representatives are also available.	
Criterio	on 1.2: The unit of certification commits to ethical conduct in all business of	perations and transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	A Policy known as 'Code of Business Conduct & Ethics' June 2020 is available which was sighted and verified during the audit. Among others, this Policy calls for:	Complied
	·	Dealing fairly with customers, suppliers, contractors, competitors and other employees;	
		 Avoid situations of conflict of interests between personal interest and interests of the Company; 	
		 Not to be influenced by receiving favours, and not to influence by giving favours; 	
		Not to accept any kinds of bribes or kickbacks or other unlawful or unethical benefits.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Mechanism for ensuring compliance is described in the "Mechanism of Tracking Law Changes", dated 27/07/2018. The sustainability team is responsible to monitor implementation/updating of information through routine monitoring and internal audit. The internal audit was conducted following the SOP on Sustainability (1.7 Internal Audit, Rev 1A, dated 03/05/2018). Procedure of controlling the disclosure of confidential information (for third party) estate dated 2011 been established to ensure the compliance and the implementation of the policy and overall ethical business practice.	Complied
		The management of each operating units monitor compliance of the policy through internal audit that has been conducted on annual basis by the sustainability department. Sighted internal audit report for each estate and there is no noncompliance of the policy during the internal audit.	

		a) Bahau Estate: 24/01/2022 b) Kuala Jelei Estate: 15/03/2022 c) Bukit Dinding Estate: 26/01/2022 Other than that, there is whistle blowing policy revised on October 2019 where the objective of the policy is to provide avenue for all stakeholders raise concern for any improper conduct without fear of retaliation and to offer protection for such persons who report such allegation. Stated in the policy, investigation of the of any issues must be completed within 2 weeks and submitted to appointed officer within 2 weeks after the investigation completed.	
Princip	e 2: Operate legally and respect rights		
Criterio	n 2.1: There is compliance with all applicable local, national and ratified in	ternational laws and regulations.	
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	 IOI Gomali POM and Supply Base estates sampled permit and licenses were verified as below: Gomali POM MPOB License; License Number: 500117204000; License Validity Period: 01/02/2022 – 31/01/2023; Possessing Capacity: 540.000 mt FFB a year. DOE Compliance Schedule; License Number: 004713; Reference Number: AS(B)J31/152/000/049; License Validity Period: 01/07/2021 – 30/06/2022. SPAN License; Class License Number: SPAN/EKS/(PT)800-4/14/09; License Validity Period: 15/01/2020 – 14/01/2023. BAKAJ Water Extraction and Diversion License; License Number: 08/A/Sgt/003; File Number: BAKAJ/334/300/5/6/8/8; Water Extraction Limit: 4008³/ day; License Expiry Date: 31/12/2022. 	Non- compliance



5. Private Installation License; License Number: LP 12/1/4/100 (CO-GEN); Licensed Capacity: 6.2; License Commencement Date: 16/01/2020; License Expiry: 10 years from the license commencement date.

Bukit Serampang Estate

- 1. MPOB License; License Number: 586845002000; License Validity Period: 01/07/2021 30/06/2022
- 2. Permit Potongan Daripada gaji Pekerja; Serial Number: PP3/29/030/2009; Permit Valid Since: 01/09/2009.
- 3. Pengandang Tekanan Tak Berapi (Air Compressor); Registraion Number; JH PMT 12496; Expiry Date: 12/03/2023.
- 4. BAKAJ Water Extraction and Diversion License; File Number: BAKAJ/334/300/05/04/07/2; License Number: 07/A/Ldg/101; Water Extraction Limit: 90³/ day; License Expiry Date: 31/12/2022.
- 5. Permit Barang Kawalan Berjadual; Serial Number: P(J 005076); Reference Number: MR/LBK/P-0008/14@SKS 132; Description: Diesel; Storage Capacity: 18,000 Liter; License Validity Period: 26/12/2021 25/12/2024.

Regent Estate

- 1. MPOB License; License Number: 586619002000; License Expiry Date: 30/06/2023.
- 2. Permit Barang Kawalan Berjadual; Reference Number: KPDNHEP(NS)600-3/3/17-SK03/1991; Description: Diesel; License Expiry: 07/10/2022.
- 3. Certificate of Fitness for Air Compressor; Reference Number: PMT-NS/2138; Certificate Expiry Date: 10/08/2023.

Bukit Dinding Estate



- 1. Permit for deduction of wages for electricity from JTK, reference no: JTK.PHG.600-2/11/3(35), endorsed on 14/07/216.
- 2. Permit for deduction of wages for NUPW from JTK, reference no: JTK.PHG.600-2/11/3(35), endorsed on 16/05/2002.
- 3. Permit for storing diesel, reference no: P6000264, expired on 20/07/2022.
- 4. Permit for storing petrol, reference no: KPDNHEP.PHG.RUB.600-5/5/557, expired on 06.02.2023.
- 5. MPOB license reference no 501850402000, expired on 30/09/2022.
- 6. Certificate of fitness for air compressor, reference no: PMT-PH/21.39683, expired on 08/06/2022.
- 7. Calibration weighing machine by Metrology Corporation Malaysia Sdn Bhd, reference no B839520083 (DE1800388), expired on 27/09/2022.

Kuala Jelei estate

- 1. MPOB License; License Number: 586620002000; Estate Area: 2018.62 Ha; License Validity Period: 01/07/2021 30/06/2022.
- Permit Barang Kawalan Berjadual; Reference Number: KPDNHEP(KP)05/709/P/1999/121; P Series Number: N000865; Description: Diesel; Storage Quantity: 18,000 Litres; License Validity Period: 27/12/2021 – 26/12/2022.
- 3. Weighbridge commissioning Certificate (CWIS/COMM/0510/21) dated 14/10/2021. This certificate produces by CWIS SYSTEMS Sdn Bhd.
- 4. License from JTK (4) PMT 10501/2016/0013 dated 23/8/2016 for water deduction from wages.

Bahau Estate



- 1. License from JTK for wages deduction (water) PMT10502/2019/0015 valid until dated 22/10/2022.
- 2. MPOB license 586370102000 was valid from 1/7/2021 until 30/6/2022.
- 3. MPOB license for nursery 589082011000 was valid from 1/10/2021 until 30/9/2022.
- 4. License to possess Arms and ammunition available under license 259384 dated 23/01/2020 and latest renew 28/6/2021.
- 5. Weighbridge calibration conducted by Metrology Corporation Malaysia Sdn Bhd (CA008865).

Nevertheless, non-conformities were identified in the certification unit as below:

Gomali POM

The mill has conducted audiometry test for 2021 on 08 - 14/07/2021 at Segamat Clinic for 117 of its workers. Based on the results provided by the clinic, 52 workers were classified under Standard Threshold Shift and stated to be retests within 3 months (90 Days). Nevertheless, the mill conducted the retest on 03 - 22/01/2022. The retest has exceeded 82 days from the 3 months supposed time frame.

Bukit Serampang Estate

Schedule	Recent	Previous	No of days from
Waste (SW)	Disposed	Disposal	last disposal
104, 305,410	11/04/2022	02/09/2021	220

It was identified that the estate has exceeded the validity period of SW storage as stipulated in the Environmental Quality Act 1974 (Act 127), prior to disposal.

		Reference: "Environmental Quality (Scheduled Wastes) Regulations 2005; PU(A) 294/2005; Regulation 9-Storage of Scheduled Wastes; No.5 – Any person may store schedule wastes generated by him for 180 days or less after its generation provided that: The quantity of scheduled wastes accumulated on site shall not exceed 20 metric tonne. Due to the non-conformities identified, a major non-conformities was raised.	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -		Complied



		 Emergency (Prevention and Control of Infectious Diseases) Amendment – Ordinance 2021 Workers' Minimum Standards of Housing and Amenities Regulations 1990 – Amendment Electricity Supply Act 1990 – Amended to Electricity Supply (Amendment) Act 2015. 	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	All operating units have established the legal boundary based on the land title that they possess. The boundary has been demarcated with boundary stones, boundary markers, security trenches and security fences. Visit to the mill and respective estate's boundary were verified as below: Gomali POM	Complied
		The mill is situated within Paya Lang Estate's. The associated land title for Paya Lang Estate (Lot 908) documents were available for verification. The mill area was clearly demarcated with fences to separate the area from the estate.	
		Bukit Serampang Estate The estate is surrounded by IOI Sagil Estate and villages. Visited the estate boundary at Field PM01F with Kampung Hang Tuah at coordinate Lat. 2°18′35.54″ N, Lon. 102°40′25.99″ E. Red Poles were erected to clearly indicate the boundary of the estate with the village.	
		Regent Estate The estate is surrounded by external estates and villages. Visited the estate boundary at Field PM05A with Kampung Sri Asahan at coordinate Lat. 2°31′06.43″ N, Lon. 102°23′21.04″ E. Red Poles were erected to clearly indicate the boundary of the estate with the village.	



Criterio	on 2.2: All contractors providing operational services and supplying labour,	and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	1
2.2.1	A list of contracted parties is maintained Minor compliance -	List of contracted parties are available and duly maintained. Reviewed during the audit were the list contains names and contact details of the contractors and this information are available in the stakeholders' list.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	All contracts sampled during the audit contain a clause that commits to compliance with legal requirements. Clauses 5 and 6 of each contract commits to compliance with legal requirements such as having valid road taxes, insurance policies, drivers possessing valid driving licences, compliance with the Malaysian Occupational, Safety and Health Act 1994, Factory & Machinery Act 1967, Environmental Laws, etc. Clause 1 of the Additional Requirements for Contractors and Service Providers confirms that the contractors are aware and comply with applicable local, national, international laws and regulations, legal requirements such as valid passports, work permits, identity cards for locals. This also includes signing of employment contracts with their worker, paying minimum wages, employing workers 18 years and above, no sexual harassment, no contract substitution, payment of insurance coverage, etc. Sighted during the audit were the following contracts: a. Agreement between Gomali POM and Tiruvalar Ramasamy A/L Rajoo for disposal of mill palm waste dated 29/10/21 (GMM/PTI) valid from 1/11/21 – 31/10/22. b. Agreement between Gomali POM and Koh Kee Hock for clearing of FFB at ramp dated 1/11/21 (GMM/002-20/21) valid from 1/11/21 – 31/10/22.	Complied



- c. Agreement between Bukit Serampang Estate and Sinar YSM Enterprise for rubbish collection dated 1/12/21 (BSE/005-21/22) valid from 1/12/21 30/06/22.
- d. Agreement between Bukit Serampang Estate and Metallic Milestone Sdn Bhd for transport of oil palm FFB dated 1/09/19 (BSE/005-21/22) valid from 1/9/19 31/08/22.
- e. Agreement between Regent Estate and SPR Contract Works for rental/hiring of excavator dated 1/07/21 (RGE/007-21/22) valid from 1/7/21 30/06/22.
- f. Agreement between Regent Estate and YIH Construction Sdn Bhd for land preparation and replanting works dated 10/2/2022 (Regent Estate -206 Ha), start date 10/2/2022 until 30/6/2022.

Bukit Dinding Estate

List of contracted parties for Bukit Dinding Estate maintained in the document title "Stakeholders List" revision number 04 dated 01/2021 where total 4 contractors listed as per below

- a. RCLS Enterprise- Hiring JCB
- b. Kannapathi A/L Manikam- Grass cutting
- c. Jit Yu Construction Construction of labor quarters
- d. Thivashyny Entterprise Hiring excavator

Kuala Jelei Estate

List of contracted parties for Kuala Jelei Estate maintained in the document title "Stakeholders List" revision number 04 dated 01/2021 where only 1 contractor for hiring JCB appointed, Mr Chong Wai Meng.

Bahau Estate

		List of contracted parties for Bahau Estate maintained in the document title "Stakeholders List" revision number 04 dated 01/2021 where only 2 contractor appointed. a. Farm Chap Lee- Hiring JCB b. Teck Lee Construction Contractor- Hiring mini excavator
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	All sampled contracts with contractors contain a provision that contractors and service providers are aware and will not engage in child, forced and trafficked labour. This provision is available under Clause 1(d) of Additional Requirements for Contractors which was signed and acknowledged by the respective contractors. The sampled contracts were as follows: a. Agreement between Gomali POM and Tiruvalar Ramasamy A/L
		Rajoo for disposal of mill palm waste dated 29/10/21 (GMM/PTI) valid from 1/11/21 – 31/10/22.
		b. Agreement between Gomali POM and Koh Kee Hock for clearing of FFB at ramp dated 1/11/21 (GMM/002-20/21) valid from 1/11/21 – 31/10/22.
		c. Agreement between Bukit Serampang Estate and Sinar YSM Enterprise for rubbish collection dated 1/12/21 (BSE/005-21/22) valid from 1/12/21 – 30/06/22.
		d. Agreement between Bukit Serampang Estate and Metallic Milestone Sdn Bhd for transport of oil palm FFB dated 1/09/19 (BSE/005-21/22) valid from 1/9/19 – 31/08/22.
		e. Agreement between Regent Estate and SPR Contract Works for rental/hiring of excavator dated 1/07/21 (RGE/007-21/22) valid from 1/7/21 – 30/06/22.
		f. Agreement between Regent Estate and YIH Construction Sdn Bhd for land preparation and replanting works dated 10/2/2022 (Regent Estate -206 Ha), start date 10/2/2022 until 30/6/2022.

		Bukit Dinding Estate Samples of 2 contractors has been samples details as per below a. RCLS Enterprise contract number BDE/002-21/22 dated 01/07/2021 for hiring JCBs b. Thivaashiny Enterprise contract number BDE/005-21/22 dated 01/07/2021	
		Kuala Jelei Estate There is only 1 contractor for hiring JCB appointed, Mr Chong Wai Meng. Contract agreement verified contract number KJE/008-21/22 dated 01/01/2022	
		Bahau Estate Contract agreement sighted at Bahau estate such as Contract No: BHE/011-21/22, dated 01/07/2021 between IOI Plantation Sdn Bhd. and Farm Chap Lee for Hiring of Backhoe.	
		Stated in the contract agreement, additional requirement for contractors and services provider issuance dated 01/12/2020 that all contractors need to comply with all applicable local, national and ratified international law and regulations. Stated also in the document that contractor need to ensure all workers is above 18 years old and there is no contract substitution.	
Criterio	on 2.3: All FFB supplies from outside the unit of certification are from legal	sources.	
2.3.1	 (C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	IOI Gomali POM receives RSPO Certified FFB from the 11 estates within the Gomali Certification Unit and also diverted FFB from other RSPO Certified IOI Plantations Berhad Oil estates such as Segamat Estate, Pukin Estate, Shahzan 1 Estate, Shahzan 2 Estate. The mill has obtained all the information required by the indicator for all active FFB Suppliers as verified during the audit.	Complied

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

	- Critical (Major) compliance -					
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	IOI Gomali POM smallholders or o the IOI Group of	Complied			
Princip	le 3: Optimise productivity, efficiency, positive impacts and resilie	nce				
Criterio	n 3.1: There is an implemented management plan that aims to achieve lor	ng-term economic	and financial vial	oility.		
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	IOI Gomali POM The 5 Year Busin and available for yearly basis by Summary Supply Capacity and Pros	Complied			
		Financial Year	MT	OER %	KER %	
		2021/2022	303,973	21.75	5.00	
		2022/2023	301,425	21.75	4.80	
		2023/2024	286,082	21.75	5.75	
		2024/2025	276,172	22.00	5.75	
		2025/2026	281,915	22.00	5.75	
		IOI Gomali Suppl The 5 Year Bus Certification Unit Plan is reviewed of	siness Plan was estates and avai	lable for verificati		

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RSPO P&C Public Summary Report Revision 13 (Apr 2022)

	Plan covers the area statement, Crop (FFB) by Year Planting, Crop (FFB) Monthly Breakdown, 10 Years Replanting Programme Summary Replanting programme by Field, Detail Replanting Programme by Field, Executive/Staff & Workers requirement General Charges Statement, Mature Oil Palm Costing Statement Capital Expenditure Statement and Summary Replanting Cost to Maturity. Verified the FFB Crop (Mt) actual (2021/2022), estimated (2022/2023) and projection (2023/2024 – 2025/2026) for the sampled estates as below:					gramme, eplanting uirement, catement, g Cost to estimate		
		Estate	21/22	22/23	23/24	24/25	25/26	
		Bukit Dinding	36430	35300	37500	39100	28500	
		Regent Estate	29565	38952	36958	45531	38744	
		Bkt Serampang	10368	8548	7349	6145	5069	
		Bahau	43870	44990	49410	58800	62450	
		Kuala Jelai	16862	12620	13250	12970	10840	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Gomali Certification Unit. Verified the 10 Years repl. Programme Summary 2020/2021 – 2029/2030. The repl. programme for the next 5 years has been stated below. IOI – Gomali Financial Year					eplanting	Complied
							Financial Year	
		Certification Unit	22/23	23/24	24/25	25/26	26/27	
		Bkt Serampang Est	t -	-	172	200	-	
		Regent Estate	215	118	170	-	-	

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		Annual replanting programme has been established by the estate under Gomali Certification Unit. Verified the 5 Years replanting programme for the Estate as follows:					
		Replanting programm	2024/25	2025/26	2026/27	2027/28	
		Bukit Dinding estate	-	30	159	288	
		Kuala Jelei estate	65	0	0	191	
		Bahau estate	0	0	0	0	
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	IOI Gomali Operating respective sites on a during the management. Results of Internation. Customer Feedbard. Status of prevent. Follow Up actions. Changes that counce. Recommendation. The minutes of meeting each thoroughly exact discussed. The man respective operating of the management. Gomali POM: 19/1- Bukit Serampang. Regent Estate: 03	yearly ba ent review al Audit ive and con for manage ild affect the s for impro- ng indicate mined, and nagement units as fol 05/2022 Estate: 30	sis. Among are as follower as follower as follower action where a follower action are action as follower action act	on plans ews nent system rnal audit fective actio	ers discussed n indings were n plan were	Complied

	on 3.2: The unit of Certification regularly monitors and reviews their economic demonstrable Continuous improvement in key operations. (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and	Continuous improvement plans for all operating units for financial year 2021/2022 were documented under Environmental impact	Complied			
	opportunities of the unit of certification Critical (Major) compliance -	assessment management action plans and continuous improvement plans available at all visited operating units. Social and environmental were among pertinent elements covered in the action plan. On top of the established plan, allocation of capital expenditure (CAPEX) for process improvement, social and environmental components were also sighted.				
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template]. PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being	RSPO metric template version 2.1 is used for the reporting of IOI Gomali POM certification unit's metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from June 2021 – May 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.	Complied			
	discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required. - Minor Compliance -	Tor the said period for all metrics.				
Criterio	on 3.3: Operating procedures are Appropriately documented, consistently imp	olemented and monitored.				
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place Critical (Major) compliance -	Standard Operating Procedures (SOPs) in the form of written document for mill and estates were documented and maintained. It covers procedures all operations relayed to the management of the mill and estate.				
		The mill's management process and operations are guided by the following documents:				



- 1. Group Standard Operating Procedures (StOP) for Palm Oil Mill Operations, 01/07/2017
- 2. Group Standard Operating Procedure (StOPs) for estate dated 30/09/2020.
- 3. Group Safe Operating Procedures (SaOP)
- 4. Group Social Impact Assessment and Management Action Plans (Guidance Document) dated 10 Oct 2011
- 5. Group Environmental Impact Assessment and Management Action Plans dated December 2007.
- 6. Internal Audit Procedure dated 3 May 2018

The StOPs reflect best industry practices as detailed in IOI's agricultural policy document. Aside from StOPs for operations of mill there exists also SaOPs for management but not limited to:

- Consultation and communication
- Negotiation on compensation.
- Guidance and procedure for gifts and hospitality.
- Selection and contracting of contractors including recruitment agencies
- Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination.
- Procedures for Supply Chain.
- Internal Audit procedure for Supply Chain
- Remediation and Compensation Procedure (RaCP)
- Accident and emergency procedures
- Proper disposal of waste material



3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	 IOI Gomali POM & Supply Base have a mechanism to check consistent implementation of procedures through periodical internal audit by Sustainability, Safety & Health Department (Peninsular). Non-compliances recorded with regards to applicable P&C 2018 indicators have been identified & closed accordingly. The mechanism of checking the consistent implementation was mainly carried out through field supervision by field staff, executive and managers. Besides that, regular visits by the Plantation Director and Plantation Controller to monitor the adherence to the organisation's SOP was also done. Documents were available as below. Gomali POM 1. Internal Audit conducted by Sustainability, Safety & Health Department (Peninsular) for Environmental & GMP Compliances on 18/01/2022. 2. Social Sustainability Internal Audit Conducted by Sustainability, Safety & health Department (Peninsular) on 25/01/2022. 3. Safety & Health Internal Audit conducted by Safety & Health Executive on 10/01/2022. Bukit Serampang Estate 1. Safety & Health Internal Audit Report 2022 by Safety & Health Executive on 17/01/2022. 2. Internal Audit conducted by Sustainability, Safety & Health Department (Peninsular) for Environmental & GMP Compliances on 28/01/2022. 3. Social Internal Audit Report by Sustainability, Safety & health Department (Peninsular) on 12/01/2022. 3. Social Internal Audit Report by Sustainability, Safety & health Department (Peninsular) on 12/01/2022. 	Complied
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		Regent Estate 1. Social Sustainability Internal Audit (RSPO & MSPO) conducted on 05/01/2022.	
		2. Safety & Health Internal Audit 2022 conducted on 21/01/2022.	
		Environment & GAP Internal Audit conducted on 25/01/2022.	
		Bukit Dinding Estate	
		Internal Audit conducted by Sustainability, Safety & Health Department (Peninsular) for Social and Environmental Compliances on 27/1/2022	
		Agronomist visit report was available dated 6/10/2021 from IOI Research Centre. This visit was to observe the palm in the field to identify and discern the nutrient requirement for tabulating the upcoming 2022 fertilizer programmed.	
		Bahau Estate	
		Internal Audit conducted for safety and health by Safety and health department dated 15/3/2022. There are 18 finding been raised by the internal auditor and all already taken action and in progress.	
		Internal audit for Environment & Gap conducted by Sustainability, Safety, Health Department dated 19/1/2022. 11 finding been raised by the internal auditor and all finding already close verified as per record and interview verification.	
3.3.3	Records of monitoring and any actions taken are maintained and available Minor Compliance -	The monitoring of the SOP implementation was closely made by all levels of the supervisory personnel to the top management with records maintained and checked. The records sighted were as follows. a. Internal Audit	Complied

		 b. Daily production/work records for the core activities at the estates c. Field cost book, d. Worksite Inspection e. Linesite Inspection f. Chemical consumption record g. Mature/immature field work program • fertilizer application, • herbicide spraying, • harvesting and collection of FFB. All the above records were kept for a minimum period of 12 months. Nevertheless, non-conformities were identified as below: Bukit Serampang Estate Bukit Serampang Estate have conducted assessment of incoming and outgoing water course (Date: 20/01/2022; Report Number: BSE/10/03/2022) and domestic water (Date: 26/11/2021) by sending samples of the water to the accredited lab/company lab for water analysis. The estate has received the results of the lab analysis. The results indicated that the results did not meet the specifications. There was no evidence of action taken post receiving the non-conforming results. Hence a minor non- 	
		receiving the non-conforming results. Hence a minor non-conformity was raised.	
	on 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA)		d environmental
	ment and monitoring plan is implemented and regularly updated in ongoing o		
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	No new planting at Bukit Serampang, Regent, Kuala Jelei, Bahau and Bukit Dinding Estate.	Complied



stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.

- Critical (Major) compliance -

SIA developed with the participation of various stakeholders, examples are worker's representatives, villagers, schoolteachers, contractors, etc. The SIA are conducted and review annually and includes mainly issues raised by stakeholders. Main social impacts identified as per the following:

- Existence of major foreign labour force [recruitment fee, contract of employment, fair treatment etc]
- Coexisting neighbouring local communities [stakeholder engagement, boundary, public access, heavy vehicle usage etc]
- Infrastructure and facilities [medical, living and sports facilities, canteen and sundry shop, place of worship]
- Safety and security [entry access, good safekeeping, peace & safe environment]
- Local social development [social contribution, women empowerment, employment offers]

Social impact assessment for all estates reviewed on May 2022 for period 2020-2025 and with participation of stakeholders by the sustainability department and management team. The assessment has been done base on baseline study on socio economic (demography, development needs and potential, infrastructure facilities and economic activities) and cultural heritage.

Other than that, the management established document "social impact assessment management plan (Mitigation measures and status) for any additional issues which raised during meeting such as JCC meeting, safety and health meeting, women and empowerment committee (WEC) meeting.

For Bukit Dinding Estate, sighted latest update on 12/05/2022 for JCC meting conducted on 11/04/2022 and stakeholder meeting



on 01/04/2022. Sample of 2 issues taken which are related to water quality and request for raincoat.

While for Kuala Jelei Estate, SIA has been updated and input collected from JCC meeting conducted on 27/04/2022. There is no significant issues gathered from the meeting only on housing repair and request for sepak takraw facilities.

Bahau Estate

Social impact assessment documented in the document social impact assessment, Bahau Estate for period 2020-2025 updated in May 2022 as a generic assessment for Bahau Estate. Other than that, the management has established on 18/03/2022 in the document social impact assessment management plan (mitigation measures and status) which respond, and information has been collected base on JCC meeting, external and internal stakeholders meeting and women empowerment committee (WEC) meeting. Samples of issues raised such as pending permit renewal for 1 Bangladesh workers and request for water tank by nearby temple.

The Sustainability team has established the Environmental Impacts Assessment and documented it in Environmental Impacts Assessment, Management Action Plans and Continuous Improvement Plans for Gomali POM and the assessed estates. The management plan was reviewed annually and EIA valid for 5 years from May 2022 – April 2027. The assessment covers on all workstation and activity in the mill and at the estates. Management Action Plan and Continual Improvement Plan documented and implemented include key indicators of performance like:

- waste management and disposal plans for the mill and estates.
- reduction and pollution prevention



		Latest updated on 20/5/22 has included the new requirement under compliance schedule for EFB storing and holding facilities which also include environmental mitigation and operation control for the above environmental aspect.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -	Evidence was available that the Social Impact Assessment (SIA), Social Management Plan and Annual Social Mitigation Plan for Gomali POM Management unit has been developed with participation of affected stakeholders such as external (local communities, contractors, suppliers, neighbouring entities, etc) and internal stakeholders (workers). These documents were prepared by each unit in collaboration with Sustainability Team, Peninsular Malaysia. Participation of affected stakeholders were in the form of: a. Discussions in various committee meetings such as the Joint Consultative Committees, Women Empowerment Committees, Employee Consultative Committees; b. Internal and external stakeholder meetings; c. Complaints and inputs recorded in the Grievance Books; and The latest Social Management Plan and Annual Social Mitigation Plan were verified for Gomali POM (May 2022), Bukit Serampamg Estate and Regent Estate. The documents have identified types of impacts, findings from the assessment, action plan and monitoring, and persons in charge. Environmental management plan for Gomali POM and estates revised in May 2022 was made available for verification. Significant environmental aspects and impacts for all environmental receptors has been identified and evaluated. As to incorporate latest requirement for EFB storage facilities, management plan has been developed for the EFB storage facilities.	Complied

3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	Social Management Plan and Annual Social Mitigation Plan for Gomali POM management unit have been implemented, reviewed and updated annually in a participatory way. Inputs form JCC meeting, external and internal stakeholders meeting and women empowerment committee (WEC) meeting were collected and used as basis for the development of management plan. The latest reviews for the Gomali POM management unit in May 2022 for both social and environmental components. Implementation of the Plans were verified when actions are being taken to ensure social impacts raised by stakeholders. For Bukit Dinding Estate, management and monitoring plan has been documented in the social impact assessment management plan (Mitigation measures and status and Latest update on 12/05/2022 while for Bahau Estate updated on 18/03/2022. For example for Gomali POM, to comply the current directive on EFB waste management, budget for EFB storage area has been approved and in the process of finalization of design drawing by M&E Department headquarters. (target completion of project by end of 2022)	Complied
Criterio	n 3.5: A system for managing human resources is in place.	2022)	
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	Employment procedure for local workers (recruitment, selection & hiring) and for foreign workers it has been document in the document title "Foreign workers recruitment guideline & procedure in Malaysia". While for retirement it has been document in appendix F where age of retirement is 60 years olds as per stated in IOI/NUPW collective agreement for field and general employees and fringe benefits 2020. While for termination, it has been documented in appendix H. The document was made available to workers and can be seen at strategic location within company premise at office notice board and line site.	Complied

3.5.2	Employment procedures are implemented, and records are maintained.	Bukit Dinding Estate	Complied
	- Minor Compliance -	As per conversation with the management, due to acute shortage of workers, all local communities are welcome to apply for works in Bukit Dinding Estate. Sample has been taken for application and recruitment on 03/02/2022 for field workers position. There is evidence that recruitment process has been done according to procedure. For retirement, sample has been taken for workers retired on 13/07/2021 workers name Mr Woon Fooi Choi. Retirement gratuity has been paid according to IOI/NUPW Collective agreement and compliance with the procedure. Kuala Jelei Estate	
		Sample of newly recruitment taken for workers name Thana Letchumy as line sweeper in on February 2022 where there is evidence that procedure for recruitment has been implemented. Records such as application form, approval, medical assessment and employment contract available and verified.	
Criterio	on 3.6: An occupational health and safety (H&S) plan is documented, effective	ely communicated and implemented.	
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented Critical (Major) compliance -	IOI Gomali Operating Units have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The HIRARC is guided by the document Occupational, Safety and Health Management System – Hazard Prevention and Control Measures; Doc Reference Number: IOI – OSH 3.3.4; Document Date: 01/08/2012. The assessment covers all main operations and support operations.	Complied
		IOI Gomali POM HIRARC was used to register and assess all risks associated to the mill operations. Sighted latest HIRARC available for all	

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

operations reviewed on 16/02/2022 such as Guard Home, Thresher Station, Workshop, Forklift and Office Compound. Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Gomali POM was conducted on 24/04/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HQ/04/ASS/00/193 - 2019/021) was available for verification. Medical Surveillance was conducted for 62 mill workers on 08/04/2022 to 20/04/2022 as per OSHA-USECHH 2000 requirements. The medical surveillance was conducted by Klinik Segamat (Occupational Health Doctor: HQ/08/DOC/00/545). The Medical Surveillance Report (Report Number: 039/OHD/2022) stated that all 62 workers passed the medical program and were fit to work. Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the mill. The NRA was conducted by ETOSH Consult & Engineering Plt (DOSH Reg Number: JH/03/04/125) on 22/05/2021 & 25/05/2021. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/21/00) was available for verification. Audiometric Medical Examination and review of Abnormal Audiograms was conducted for 117 mill workers identified to be exposed to excessive noise as recommended in the NRA at Specialist Mobile Safety Supplies Sdn Bhd on 08/07 & 14/07/2021. The results indicated that 12 workers had hearing impairment and 52 workers with standard threshold

shift. An audiometric retest was conducted for 51 workers



from 03 – 22/01/2022. Based on the results obtained, 3 workers were reported to DOSH under JKKP 7.

2. BKT Serampang Estate

- Sighted HIRARC available for all operations such as Harvesting (Review Date: 29/04/2022), Chemical Spraying (29/04/2022) and Manuring (29/04/2022).
- Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Bukit Serampang Estate was conducted on 21/05/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HQ/04/ASS/00/193 – 2019/042) was available for verification.
- Medical Surveillance was conducted for 10 workers on 27/02/2022 as per OSHA-USECHH 2000 requirements. The medical surveillance was conducted by Klinik Segamat (Occupational Health Doctor: HQ/08/DOC/00/545). The Medical Surveillance Report (Report Number: 021/OHD/2022) stated that all 10 workers passed the medical program and were fit to work.
- Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estate. The NRA was conducted by ETOSH Consult & Engineering Plt (DOSH Reg Number: JH/04/04/699) on 16/06/2020. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/20/ 00180) was available for verification.
- Audiometric test was conducted for 14 workers identified by the estate as recommended in the NRA at KPJ Bandar



Maharani Specialist Hospital on 19 – 20/04/2022. The results indicated that all workers had normal hearing or mild hearing loss and are recommended for annual audiometry monitoring.

3. Regent Estate

- Sighted HIRARC available for all operations such as Harvesting (Review Date: 29/04/2022), Biological Hazard (29/04/2022) and Nursery (29/04/2022).
- Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Regent Estate was conducted on 28/02/2022 by ETOSH Consult & Engineering Plt (DOSH Assessor Registration: HQ/22/ASS/00/00052). The CHRA Report (Report Number: HQ/22/ASS/00/0052-2022/1) was available for verification.
- Medical Surveillance was conducted for 21 workers on 06/04/2022 as per OSHA-USECHH 2000 requirements. The medical surveillance was conducted by Klinik Segamat (Occupational Health Doctor: HQ/08/DOC/00/545). The Medical Surveillance Report (Report Number: 038/OHD/2022) stated that all 21 workers passed the medical program and were fit to work.
- Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estate. The NRA was conducted by ETOSH Consult & Engineering Plt (DOSH Reg Number: NS/03/04/191) on 21/07/2022. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/21/ 00281) was available for verification.

Audiometric test was conducted for 19 workers identified by the estate as recommended in the NRA at Kelinik Raja & Surgeri,

			<u> </u>		
		Bahau on $01 - 31/03/2022$. The results indicated that all workers had normal hearing or mild hearing loss and are recommended for annual audiometry monitoring.			
		The Occupational Safety and Health Plan for the year 2022 were available for all the sampled estates. The Safety and Health Plan covered the implementation among others as below:			
		He	- IOI Plantation have established the Occupational Safety, Health and Hygiene Policy signed by the Plantation Director, Mr. N B Sudhakaran on March 2022		
		The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates. Details as below: -			
			Estate	Date Conducted	
			Bukit Dinding Estate	05/01/2022	
			Kuala Jelei Estate	24/01/2022	
			Bahau	20/01/2022	
			8/88521/2021 dated 17/ nau Estate.	1/2022 with total 28 accident reco	rd
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -	ensur IOI Go aroun HIRAI mana	ed through checklist and omali POM and its estate d the mill and estates in RC were followed a gement units.	th and Safety Plan is monitored ard trainings that were conducted be in each of the operations. Site visit dicated the control measures as pend ensured by the respective	by
		Bukit			
				ucted through HIRARC based on though the control of the consist of hazares.	

- identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive). HIRARC being reviewed on periodical basis or if any occurrence of accidents. HIRARC sighted for the 56 work operations and reviewed on 29/4/2022.
- Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Bukit Serampang Estate was conducted on 21/05/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HQ/04/ASS/00/193 – 2019/042) was available for verification.
- Medical Surveillance was conducted for 10 workers on 27/02/2022 as per OSHA USECHH 2000 requirements. The medical surveillance was conducted by Klinik Segamat (Occupational Health Doctor: HQ/08/DOC/00/545). The Medical Surveillance Report (Report Number: 021/OHD/2022) stated that all 10 workers passed the medical program and were fit to work.
- Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates. The NRA was conducted by ETOSH Consult & Engineering Plt (DOSH Reg Number: JH/04/04/699) on 16/06/2020. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/20/ 00180) was available for verification.
- Audiometric Test was conducted for 14 workers identified to be exposed to excessive noise in the estate at KPJ Bandar Maharani Specialist Hospital on 19/04/2022 & 20/04/2022.



The results showed that 5 workers had normal hearing and 9 workers had mild hearing loss. **Bukit Dinding Estate** Risk assessment was conducted through HIRARC based on the severity and the likelihood. HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive). - HIRARC being reviewed on periodical basis or if any occurrence of accidents. HIRARC sighted for the 56 work operations and reviewed on 29/4/2022. - Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Bukit Dinding Estate was conducted on 21/05/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HO/04/ASS/00/193 - 2019/042) was available for verification. - Medical Surveillance was conducted for 13 workers on 30/03/2022 as per OSHA USECHH 2000 requirements. The medical surveillance was conducted by Klinik Kiru (Occupational Health Doctor: HQ/19/OHD/00/00366). The Medical Surveillance Report (Report Number: 006/OHD/2021 & 025/OHD/2021) stated that all 13 workers passed the medical program and were fit to work. Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates. The NRA was conducted by ETOSH Consult & Engineering Plt (DOSH Reg Number:



PH/03/04/413) on 14/09/2020. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/21/00302) was available for verification.

 Audiometric Test was conducted for 3 workers identified to be exposed to excessive noise in the estate at Poliklinik Ar Razi on 22/04/2022. The results showed that 3 workers had normal hearing.

Kuala Jelei Estate

- Risk assessment was conducted through HIRARC based on the severity and the likelihood. HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive).
- HIRARC being reviewed on periodical basis or if any occurrence of accidents. HIRARC sighted for the 56 work operations and reviewed on 29/4/2022.
- Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Kuala Jelei Estate was conducted on 12/09/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HQ/04/ASS/00/193–2019/066) was available for verification.
- Medical Surveillance was conducted for 3 workers on 30/03/20201, as per OSHA-USECHH 2000 requirements. The medical surveillance was conducted by Kelinik Raja (Occupational Health Doctor: HQ/19/DOC/00/215). The Medical Surveillance Report stated that all 3 workers passed the medical program and were fit to work.



- Noise Risk Assessment was conducted by Etosh Consult & Engineering Plt, dated on 25/09/2020, DOSH registration no: NS/05/04/748. The assessor has identified 4 Similar Exposure Group according to job classification. The assessment recommended to establish audiometric test program on annual basis for tractor driver and grass cutter operator.
- Audiometric test was conducted on 14–18/04/2022. 4 workers were sent clinic for assessment and results showed that their hearing was normal.

Bahau Estate

- Risk assessment was conducted through HIRARC based on the severity and the likelihood. HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive).
- HIRARC being reviewed on periodical basis or if any occurrence of accidents. HIRARC sighted for the 56 work operations and reviewed on 29/4/2022.
- Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Bahau Estate was conducted on 04/05/2018 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193-2018/034). The CHRA Report (Report Number: HQ/04/ASS/00/193-2019/066) was available for verification.
- Medical Surveillance was conducted for 5 workers on 27/02/2022 as per OSHA USECHH 2000 requirements. The medical surveillance was conducted by Kelinik Raja

		 (Occupational Health Doctor: HQ/11/I Medical Surveillance Report (Report Numb stated that all 5 workers passed the medical fit to work. Noise Risk Assessment Report (NRA) compliance to Occupational Safety & Healt Regulations 2019 in the estates. The NRA ETOSH Consult & Engineering Plt (DC NS/03/04/185) on 16/06/2020. The Bassessment Report (Report Number: H00268) was available for verification. Audiometric Test was conducted for 28 work exposed to excessive noise in the estate 24/02/2022 & 17/03 /2022. The results show 	er: 021/OHD/2022) Il program and were was conducted in th (Noise Exposure) was conducted by OSH Reg Number: aseline Noise Risk HQ/LPROYKPEB/20/ ers identified to be at Kelinik Raja on	
0 11 1		had normal hearing and 9 workers had mild h	earing loss.	
Criterio	on 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract w	orkers are appropriately trained.		
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -	A training programme has been developed a Safety and Health Training Matrix and Training the Year 2022 – Gomali Palm Oil Mill and Est were sighted to have been sub categorise Environmental, GAP, SOP, Social, Tracea Structure Inspection, SUS Program and Legal	g Need Analysis For tates. The trainings ed to trainings on ability, Building &	Complied
3.7.2	Records of training are maintained Minor Compliance -	IOI Gomali POM and estates have established for all workers based on the training need and a yearly basis. Records of trainings were maintained by the egomali POM	alysis conducted on	Complied
		Training	Date	

1	
Confined Space Training	29/03/2022
Safe Operations Training	06/04/2022
Company Policies Training	03/02/2022
Waste Segregation Training	28/03/2022
Wildlife Training	28/03/2022
Grievance & Complaint Procedure Training	04/02/2022
Sexual Harassment Training	04/02/2022
Bukit Serampang Estate	
Training	Date
First Aid Box Training	04/02/2022
Fire Fighting and Fire Drill Training	07/02/2022
Weighbridge Operator Training	07/02/2022
Harvesting Training	08/02/2022
Buffalo Cart SOP Training	15/02/2022
Working at Height Training	24/02/2022
Manuring Training	07/02/2022
Confined Space Training	24/02/2022
Regent Estate	
Training	Date



Oil Trap Maintenance	12/04/2022
Buffer Zone Training (Sprayers)	13/04/2022
Wildlife Training	09/02/2022
Waste Segregation Training	09/02/2022
HCV Training	09/02/2022
PPE Training	15/02/2022

Bukit Dinding Estate

- SaWP for chemical mixing training 10/05/2022
- SaWP for chemical spray & HIRARC 01/03/2022
- SaWP for chemical storage and chemical management training 05/03/2022
- Schedule waste management training 13/05/2022

Kuala Jelei Estate

- Emergency response training 09/05/2022
- Chemical storage and management training 29/04/2022
- Chemical mixing training 29/04/2022
- Spill kit evaluation assessment training 29/04/2022

Bahau Estate

- SOP training on chemical storage & mixing 30/07/2021
- SaOP chemical sprayer & PPE usage training 25/02/2022
- Waste segregation training 17/01/2022

		Hearing conservation training conducted on 3/3/2022 and 25/4/2022 and this training conducted by total 158.	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	The appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS), training was conducted on 13/05/2022 for all critical control point.	Complied
Criterio	on 3.8: Supply chain requirement for mills		
(note: A	Il supply chain requirements are considered as Critical (C) . However, it will n	ot contribute to suspension if there is more than 5 non-compliance wi	thin a principle
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Gomali POM uses the Supply Chain Module: Identity Preserved. The management has established the SOP for Supply Chain and Traceability (Mill); RSPOSC/SOP/IP/3; Revision No: 06; Dated: 08/09/2018 and RSPO/SOP/COS/3; Issue 09; Dated 07/05/2019 which covered unique running batch number, supply chain model (IP), training, persons responsible, registration and reporting requirements, handling of noncertified product, RSPO stamps (IP), authorization, delivery/goods received. The Mill only process FFB received from its own certified supply base namely Gomali Estate, Paya Lang Estate, Bahau Estate, Kuala Jelei Estate, Tambang Estate, Sagil Estate, Regent Estate, Bertam Estate, Jasin Lalang Estate, Bukit Serampang Estate and Bukit Dinding Estate. Besides that, the mill also receives FFB from other RSPO certified estates that belong to IOI Corporation Berhad as well.	Complied
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only	Gomali POM uses the Supply Chain Module: Identity Preserved. Therefore, this indicator is not applicable.	Complied



	the volume of oil palm products produced from processing of the certified FFB as MB.				
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure	The estimated tonnage of FFB, CPO and PK products that could potentially be produced for the period July 2021 – Apr 2022 as per details below:			Complied
	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	Products	Extraction Rate	Mt	
	produced shall then be recorded in each subsequent annual surveillance	FFB	-	238,519.6	
	report.	СРО	21.84 %	52,095.08	
		PK	4.58 %	10,921.77	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	for the Identity Pre PalmTrace Platform. V 1. RSPO Membership 2. Membership Appro 3. PalmTrace Registr 4. Member Category 5. License Number:	 Membership Approval Date: Since 23 August 2010. PalmTrace Registration: Gomali POM & Estate Groupings. Member Category: Oil Mill License Number: RSPO 930588 		
3.8.5	Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	implement the ele as below: - CSFFB, CSPO Mills, Wareho	implement the elements of the applicable supply chain model		

		DCDC C Cl : M L D CDC MIII T III	
	b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	- RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP). Doc Number: RSPOSC/SOP/IP/3; Revision Number: 07; Doc Date: 21/09/2020	
	c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.	 Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018. b. The record was up to date, the latest training was done on 13 May 2022. 	
	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	c. Appointment letter dated 11/01/2021 to Mr Fernandez Samy Francis as Supply Chain Officer was available. The identification of role of the person was available in the procedure under 4. Responsibility & Procedure (RSPO/SOP/COC/4). In the appointment letter the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements has been stated. The receiving and processing certified and non-certified FFB procedures is documented in the CSFFB, CSPO and CSPK Traceability System for Estates, Mills, Warehouse and Trading Companies; Doc. Number: RSPO/SOP/COC/4; Issue No: 1; Doc. Date: 01/10/2020; Section 5.4 Handling RSPO Products.	
3.8.6	Internal Audit i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation.	Written procedure available as Procedure Manual Title: Internal Audit; Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018 and Sustainability Management Procedure Manual Title: CSFFB, CSPO, CSPK Traceability System for estates, Mill, warehouses and trading companies. The Internal Audit was done on 17/01/2022 by Sustainability team available in the RSPO Supply Chain Internal Audit Report (According to RSPO SCCS 2020). From the report there are 2 Major Non-conformities by the internal auditor. The corrective	Complied

	ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.	action plan also available in the report and close by the auditor on 17/05/2022. Management Review Meeting was done on 19/05/2022. The management review discusses the Result of audit, customer feedback, process performance and product conformity, status of preventives, Follow up actions and recommendation of improvement. The company maintains 3 years records of all documentation. Sampling internal audit report on 2020 was available for review.	
3.8.7	Purchasing and Goods In i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.	When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the FFB despatch report is as follows: Estate WB chit no. (383) Estate's names (Kuala Jelei Estate) Date of delivery (21/5/2w) Block 1 Lorry no. JER6057 Weight (33.56 mt) Mill WB ticket: FB22006050 Estate WB chit no. (71324) Estate's names (Shazan IOI 1 Estate) Date of delivery (26/02/2022) Block no.3 Lorry no. NDH1899	Complied

200	Salos and Goods Out	Weight (31.80 mt) Mill WB ticket: FB22002360 Traceability Identification: RSPO certified FFB (RSPO 927888) Compile POM, encured the required information is available in	Complied
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation): a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number.	 Gomali POM ensured the required information is available in document form. Sampled of CPO contract: 2031013086 dated 16/11/21, quantity 1,500 mt (delivery month – November – December 2021) The name and address of the buyer; XXX The name and address of the seller: Gomali POM The loading or shipment/ delivery date; e.g. 16/11/21 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); Crude Palm Oil (CPO) RSPO IP The quantity of the products delivered; e.g 44.17 mt Any related transport documentation; e.g. Despatch note e.g. #CP21001323 Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 727112 A unique identification number: palm trace no. TR-43fbccf4-3c0d Available in a few forms e.g. DN no., seal no., etc. 	Complied

		Gomali POM ensured the required information is available in document form. Sampled of PK contract: 231016238 dated 10/3/22, quantity 617.81 mt (delivery month – March 2022)	
		The name and address of the buyer; XXX	
		The name and address of the seller: Gomali POM	
		The loading or shipment/ delivery date;	
		e.g. 10/3/2022	
		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);	
		Palm Kernel (PK) RSPO IP	
		The quantity of the products delivered; e.g. 41.61 mt	
		Any related transport documentation; e.g. Despatch note e.g. #PK22000073	
		Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 727112	
		A unique identification number: palm trace no. TR-28ff5c35- 0dfe	
		Available in a few forms e.g. DN no., seal no., etc.	
3.8.9	Outsourcing Activities i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors	The mill has updated procedure on handling, refer title RSPO Supply Chain - Identity Preserve (IP) RSPOSC/SOP/IP/3 Rev: 08 dated 31/10/2020.	Complied
	for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following:	Outsourcing only applicable for CPO despatch based on the delivered contract with buyers. No outsourcing for PK despatch that have ex-mill contracts with buyers. Sighted the contract agreement as following; -	

	 a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	Agreement for Transport of Crude Palm Oil; Agreement date: 01/09/2021 between Sasaran Perentas Sdn Bhd (Transporter) and Dynamic Plantations Berhad. The mill has no legal ownership of all input material (CPO and PK) and the product belong to buyer. Outsourced process only for transportation as no milling activities allowed to be outsourced. In the agreement also stated that the certification body (CB) has access to the transporters if an audit is deemed necessary, and to provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Gomali POM have a record of all contact detail for transporter and updated in the stakeholder list.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Gomali POM are aware that they are to inform he CB in advance if there are any new contractor used for the physical handling of RSPO certified palm products. Verified during the assessment that there was no new contractor used for physical handling of RSPO products.	Complied
3.8.12	 Record keeping i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory 	Gomali POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. As per the RSPO Supply Chain – Module: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 2 years' period. Sampled records of FFB weighbridge tickets and daily	Complied

	requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three	production records for last 2 years were still in place for verification. The material and products movement on real-time basis is recorded in "Month End Production Report" for both CPO and PK. The data is summarised in "CPO/PK Mass Balance Calculation (Internal Process & Output for Financial Year XX/YY". Among the information available in the format is date, FFB processed, OER, CPO amount [opening, produced and closing] and transferred CPO [mill weight, refinery weight].	
3.8.13	 (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. Extraction Rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently. 	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil	Gomali POM has implemented the procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPOSC/SOP/IP/3 Rev: 07 dated 21/09/2020. From the record verification no 3 rd	Complied



	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	party FFB received at in Gomali POM. The FFB source only from supply base own supply base under Gomali POM certification unit.	
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly.	Complied
	conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.		
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has obtained Trademark License from RSPO and seen the trademark license # 2-0002-04-100-03 which valid from 25/01/2022 to 24/01/2024.	Complied
Genera	l corporate communications		
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	IOI has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: https://www.ioigroup.com/Content/BUSINESS/B Product	Complied
4.2	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.	IOI has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: https://www.ioigroup.com/Content/BUSINESS/B Product	Complied



	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.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	IOI Plantation does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	IOI Plantation ensure 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.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No RSPO corporate logo used as evidence during the document audit and site visit.	Complied
Busine	ss 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.	Business to business communication is demonstrated via shipping documentation and sales contract to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	The requirements of the RSPO SCCS are adhered to and was verified from the sampled weighbridge tickets of the sales of CPO and PK.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:	Not applicable as IOI Gomali POM is neither distributors nor wholesalers.	Not Applicable
	a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in		

 the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES		
Certified oil palm content (IP)		
For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Not Applicable for IOI Gomali POM as the content of Oil Palm is 100%.	Not Applicable
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.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
Labelling and trademark (IP)		
 Members are allowed to use the RSPO label in one of the following ways: RSPO trademark which includes the tag 'CERTIFIED' or 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. 	As at to date, no RSPO trademark used by the facility.	Complied



Messag	Messaging (IP)				
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:	As at to date, no RSPO trademark used by the facility.	Complied		
	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.				
Princip	le 4: Respect community and human rights and deliver benefits				
Criterio	on 4.1: The unit of Certification respects human rights, which includes respe	ecting the rights of Human Rights Defenders.			
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. - Critical (Major) compliance -	The IOI Group Sustainable Palm Oil Policy rev October 2020 demonstrate the commitments to respect and uphold the rights of all workers including contract, temporary and migrant workers in accordance to the Universal Declaration of Human Rights and the United Nation Guiding Principles on Business and Human Rights (where prohibit retaliation of grievance informer). The policy is seen to be published on notice boards of the sampled estates and mill.	Complied		

		organization. Communication of the	Norkers are being inducted on the policy when the joined the organization. Communication of the policy has been done during the stakeholder consultations for both internal and external stakeholders.		
		Estates	Internal stakeholder consultation	External stakeholder consultation	
		Kuala Jelei Estate	27/04/2022	21/04/2022	
		Bukit Dinding Estate	11/04/2022	11/05/2022	
		Bahau Estate	14/04/2022	21/04/2022	
		The policy briefing/awaverified as per records			
		b) Kuala Jelei Esta	ate – conducted on 21 - conducted on 11, 20	/03/2022	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Base on interview and so not instigate violence operations.			Complied
Criterio	on 4.2: There is a mutually agreed and documented system for dealing with	complaints and grievano	ces, which is implemen	nted and accepted by all	affected parties
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Grievances procedure established in document reference number IOI/GP/001 revision 20/01/2020 and grievance process has been explained in process flow chart where each operating units will appoint one persons in charge to coordinate any grievance received. Few channels for grievance established which is through email, telephone, writing.		Complied	

4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Communication of the procedure has been done during the stakeholder consultations for both internal and external stakeholders. One of the procedures in place to ensure the grievance system is understood by affected parties is by providing verbal awareness briefings, and where necessary, a translator	Complied
		complaint has been recorded in social mitigation plan and action plan is still in progress. While for Kuala Jelei Estate, Mr Chai Shin Yi has been appointed. The management has established 3 channel of complaint which are through any meeting that will be recorded in Social impact assessment mitigation plan, housing repair which records has been maintained through "Borang aduan kerosakkan rumah" form, and other complaint will be recorded in the "Buku Aduan, rungutan dan cadangan". Base on all 3 records, most of the complaint is related to housing and facilities repair.	
		For Bukit Dinding Estate, Mr Savandappan S Cheety has been appointed as PIC and sighted appointment letter dated 01/03/0221 any grievances it has been recorded in grievance and complaint logbook. There is only 5 complaint in year 2021 and 1 complaint received in year 2022 for housing repair. Other than that, complaint received during JCC meeting conducted in 11/04/2022 where 1 worker representative complaint about the water quality. The	
		Other than that, there is whistle blowing policy revised on October 2019 where the objective of the policy is to provide avenue for all stakeholders raise concern for any improper conduct without fear of retaliation and to offer protection for such persons who report such allegation. Stated in the policy, investigation of the of any issues must be completed within 2 weeks and submitted to appointed officer within 2 weeks after the investigation completed.	



(among most senior foreign workers by nationality) is engaged to
assist with translations and understanding.

Estates	Internal stakeholder consultation	External stakeholder consultation
Kuala Jelei Estate	27/04/2022	21/04/2022
Bukit Dinding Estate	11/04/2022	11/05/2022
Bahau Estate	14/04/2022	21/04/2022

Bukit Dinding Estate.

Evidence of communication of the procedure sighted in the training records conducted on 15/03/2022 attended by all the workers during the muster call by Mr Nagenthiran Murthy.

Kuala Jelei Estate

Complaint procedure training conducted on 30/03/2022 for all the workers done by Mr Chai Shin Yi for 4 different procedure.

- a. Grievance procedure
- b. OC Grievance procedure
- c. Stakeholder complaint procedure
- d. Stakeholder request procedure.

One of the procedures in place to ensure the grievance system is understood by affected parties is by providing verbal awareness briefings, and where necessary, a translator is engaged to assist with translations and understanding.



4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.

- Minor compliance -

There is evidence that all the complaint and grievances has been responded in timely manner as per stated in SOPs. The procedure and flowchart outlined the mechanism whereby all complaints or grievances will be received and be acted upon by the Social Liaison Officers who will investigate the matter and resolve with the affected parties. Furthermore, the process requires the complaint and grievance to be resolved within 24 hours (acknowledge), 30 working days (investigate) and 10 working days (meet up).

Sampled of complaint regarding to housing area at Bukit Dinding Estate, the complaint has been logged on 06/10/2021 and action been taken on 15/10/2021.

Process to keep parties to a grievance informed of its progress, including against agreed timeframe and the outcome was not effective and communicated to relevant stakeholders.

Gomali POM

Based on interview with NUPW head and other JCC representatives, the have a few complaints which commonly shared between estate and mill. Issues related to road condition and repairs, waste handling and road safety were highlighted. These issues were trailed further in the complaints/green book and JCC's 2022 meeting minutes. None of the said issues recorded hence progress, agreed time frame and outcome was not available for verification.

Bukit Serampang

Based on interview with neighbouring village representatives (Kg Sengkang), they have highlighted on the replanting activities which is still in progress. Issues related to small/bottleneck drain and resulting to overflow and flooding to the some of the villager's farm are among their concern. Investigation of the said issue was not yet initiated hence validity of complaint was not able to be further verified.

Noncompliance

		Thus, a minor NC was raised.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	(IOI/P/GP/001; Rev 1; dated 20/01/2020) includes an option of a	Complied
Criteri	on 4.3: The unit of Certification contributes to local sustainable developmen	nt as agreed by local communities.	
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Among contributions verified at respective operating units: Bukit Dinding Estate a. Drinking water distribution on 23/12/2021 b. Debris and rubbish clearance in Taman Seri Makmur due to flood in 20/12/2021 c. Water distribution to Taman Resident on 24/12/2021 d. Distribution of chicken during Eid Adha. Kuala Jelei Estate a. Contribution to Hindu Temple b. Distribution of chicken during Eid Adha. Bahau Estate a) Providing sport equipment such as table tennis set and carrom game set for workers, dated on 06/03/2021. b) Providing meat to Muslim Workers for Hari Raya celebration, dated on 11/05/2021. Contribution to "Pertubuhan Generasi Baru Bahau", dated on 14/03/2021. Gomali POM - Meat/beef for Raya celebration (2/5/2022)	Complied

Criterio	on 4.4: Use of the land for oil palm does not diminish the legal, customary o	Futsal court for recompleted by JunFood supply/ratio	n for workers (30/4	ort activity (ex		sent.
4.4.1	customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance -	Land title was ava Corporation Berhad I the land titles. Docum as following:	nas the legal owner	ship/lease w	hich stated in	Complied
		Land title	Land ownership/ history of land tenure	Land use type	Estate	
		Sample: i) No. HK 214534, lot 2736, Mukim: Bukit Serampang, District: Tangkak	Freehold	Agriculture	Bukit Serampang	
		ii) No. HK 215538, lot 2736, Mukim: Tangkak, District: Ledang				
		Land area: 2,725.13 ha Total land titles: 13				
		Sample: i) No. HK 22943, lot 1754,	Freehold (previously	Agriculture	Regent	



Mukim:	owned by Dunlop	
Gemencheh,	Estates Berhad)	
District: Tampin		
ii) No. HK 22948, lot 1759, Mukim: Gemencheh, District: Tampin		
Land area: 2,303.13 ha		
Total land titles: 22		

Bukit Dinding Estate

Total 17 land title listed and document title "List of land title" issuance date 01/12/2021 and latest acquisition sighted in year 1998 for 5 land titles. Sample of 5 land title taken and verified as per below

Land title No. /Lot No	Hectarage	Land status
GRN 186/ 3015	355.6862	Rubber
GRN 9423/ 3303	1.0598	Rubber
GRN 183/ 2261	15.57	Rubber
GRN 185/ 2264	2.7013	Rubber
GRN9893/2644	79.90	Rubber



Application to change land status has been submitted on 06/04/2022 but still pending for approval by Jabatan Tanah Daerah Bentong.

Kuala Jelei Estate

Total 9 land title listed and document title "List of land title" issuance date 14/03/2022 and latest acquisition sighted in year 2002. Sample of 5 land title taken and verified as per below

Land title No. /Lot No	Hectarage	Land status
64080/Lot 425	90.3459	N/A
76334/Lot 612	225.3167	N/A
68904/ Lot 739	189.3996	N/A

Bahau Estate

Total 16 land titles for Bahau Estate with total land area 2877.376Ha and list updated on 09/05/2022. 15 land status for the land title is for oil palm planting. Details as per below

Land title No. /Lot No	Hectarage	Land status
HSD 21861	1406.20	Oil Palm
G74858	404.400	Oil Palm
HSD21865	63.10	Oil Palm
HSD 19830	40.97	Oil Palm

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

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		HSD 19833	10.67	Oil Palm	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Appendix 4; Rev 2. Land Use Compe Rev 1A; dated 17 3. Negotiation Proc Consent (SOP: 6.	res are in place to resoldure for Land Owne 1A; dated 17/01/2017 ensation Procedure (Ser/01/2017). The Edure Through Free 11; Appendix 5; Rev 1 anding village and stake	olve land matters: or Issues (SOP: 6.11; or OP: 6.11; Appendix 8; or Prior and Informed or IA; dated 17/01/2017) or Prior confirms that	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	However, the procedu 1. Grievance Proce Appendix 4; Rev 2. Land Use Comper 1A; dated 17/01/ 3. Negotiation Proc Consent (SOP: 6.	res are in place to reso dure for Land Owne 1A; dated 17/01/2017 nsation Procedure (SOP (2017). cedure Through Free 11; Appendix 5; Rev 1 nding village and stak	er Issues (SOP: 6.11; 7) 2:6.11; Appendix 8; Rev , Prior and Informed LA; dated 17/01/2017) eholders confirms that	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	However, in case of ar following procedure: 1. Grievance Proce Appendix 4; Rev	ny land dispute, it will dure for Land Owne 1A; dated 17/01/2017	ision is not necessary. be managed using the er Issues (SOP: 6.11; er 1: 4: 6.11; Appendix 8; Rev	Complied

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4.4.2c	Cridence that the legal according an irrepresental and accial implications	1A; dated 17/01/2017). Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017	Complied
4.4.2C	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	As this is not new development, such decision is not necessary. However, in case of any land dispute, it will be managed using the following procedure: 1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017) 2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017). Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Estates location maps and estate operations maps are retained and available. As this is not new development, these maps are no required to developed through participatory mapping.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	As this is not new development, it is not necessary to retain information related to propose benefit sharing and legal arrangement. However, in case of any land dispute, it will be managed using the following procedure: 1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017) 2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017). 3. Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Complied



4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	As this is not new development, such representative is not required for any negotiation. However, to maintain the operations, the surrounding communities are represented by village leaders that is elected by local authorities.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	As this is not new development, there is no implementation of FPIC agreements.	Complied
	on 4.5: No new plantings are established on local peoples' land where it cae alt with through a documented system that enables these and other stake		
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. Quit Rent payments were further evaluated that IOI still maintain the ownership of the lands. Despite this indicator is not applicable due to this certification is not from a new development, IOI still maintain the rights of the user to enter the lands particularly for ritual activities and schools. Interview with stakeholders and nearby villagers confirms this rights	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Complied

4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Complied
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and	Not Applicable

	- Minor compliance -	Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new land acquisition for this certification.	Complied
	n 4.6: Any negotiations Concerning compensation for loss of legal, customatical communities and other stakeholders to express their views through the		bles indigenous
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	 However, in case of any land dispute, it will be managed using the following procedure: Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017) Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017). 3. Negotiation Procedure Through Free,	Complied
		rights of the existing user to enter the lands particularly for ritual activities and schools. Interview with stakeholders and nearby villagers confirms this rights.	
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -		Complied

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	There is no compensation record for this certification while there is also no smallholders within the certification.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There is no such negotiation, compensation and payments for this certification as it is not applicable due to this certification is not a new development.	Complied
	on 4.7: Where it can be demonstrated that local peoples have legal, cushment of rights, subject to their FPIC and negotiated agreements.	stomary or user rights, they are compensated for any agreed land a	acquisitions and
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	As this certification not new development, it is not required to conduct any prior identification for compensation. However, in case of any land dispute, it will be managed using the following procedure: 1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017) 2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017). Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	As this certification is not new development, no compensation was involved. However the Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017) is in place to manage any arises compensation.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.	Although this certification is not new development, IOI still maintain the rights of the existing user to enter the lands particularly for ritual	Complied

	- Minor compliance -	activities and schools. Interview with stakeholders and nearby villagers confirms these rights.	
Criterio rights.	on 4.8: The right to use the land is demonstrated and is not legitimately co	ntested by local people who can demonstrate that they have legal, cus	tomary, or user
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. The FPIC process is not applicable for this certification. However for any land dispute, it will be managed with the following procedures: 1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017) 2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017). Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. The FPIC process is not applicable for this certification. However for any land dispute, it will be managed with the following procedures: 1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017) 2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).	Complied

		Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. The FPIC process is not applicable for this certification. However for any land dispute, it will be managed with the following procedures: 1. Grievance Procedure for Land Owner Issues (SOP: 6.11;	Complied
		Appendix 4; Rev 1A; dated 17/01/2017) 2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8;	
		Rev 1A; dated 17/01/2017).	
		Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. The FPIC process is not applicable for this certification. However for any land dispute, it will be managed with the following procedures:	Complied
		1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)	
		2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).	
		Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	



Princip	le 5: Support smallholder inclusion		
Criterio	on 5.1: The unit of certification deals fairly and transparently with all small	nolders (Independent and Scheme) and other local businesses.	
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance - Since the last recertification audit, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders' crops. Hence such payment is not applicable		
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Since the last audit, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders' crops. Hence it is not necessary carry out this briefing.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Since the last audit, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders' crops. Hence it is not necessary to carry out this analysis	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	Since the last audit, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders' crops. Hence this requirement is not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe Minor compliance -	Since the last recertification audit, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders crops. Hence such contract is not applicable	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Since the last recertification audit, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not	Not Applicable



	- Critical (Major) compliance -	received any smallholders crops. Hence such payment is not applicable	
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	There is no smallholder suppliers within IOI Gomali Region. However the weighbridge has been periodically calibrated. The last calibrations for the weighbridges was conducted on 08/08/2021. The calibration was conducted by Metrology Department and remains valid during the assessment.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There is no smallholder suppliers within IOI Gomali Region.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Since there is no smallholder suppliers, there is no specific grievance mechanism for smallholders. However, the company general Grievance Procedure (IOI/P/GP/001; rev 1; dated 20/01/2020) is observed to manage any grievances.	Complied
Criterio	n 5.2: The unit of certification supports improved livelihoods of smallholde	rs and their inclusion in sustainable palm oil value chains.	
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholder suppliers within IOI Gomali Region.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).	There are no smallholder suppliers within IOI Gomali Region. However, due to the recertification process, Sembilan Tani outgrower was excluded temporary due to liability declaration. IOI has committed that they will provide guidance and advise on the	Complied



	- Minor compliance -	process and procedur submitted to RSPO.	re to complete this a	ssessment and to be	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallhold	There are no smallholder suppliers within IOI Gomali Region.		
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling Critical (Major) compliance -	There are no smallhold	There are no smallholder suppliers within IOI Gomali Region.		
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholder suppliers within IOI Gomali Region.			Not Applicable
Princip	le 6: Respect workers' rights and conditions				
Criterio	on 6.1: Any form of discrimination is prohibited.				
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	demonstrate the commitments towards non-discrimination and equal opportunity for all employees, regardless of race, nationality,			Complied
		Estates	Internal stakeholder consultation	External stakeholder consultation	

		1-1		1 1	1
		Kuala Jelei Estate	27/04/2022	21/04/2022	
		Bukit Dinding Estate	11/04/2022	11/05/2022	
		Bahau Estate	14/04/2022	21/04/2022	
		The policy briefing/awa verified as per records		ed at each estates was	
		a) Bukit Dinding Estat	e – conducted on 15-	17/03/2022	
		b) Kuala Jelei Estate -			
		c) Bahau Estate – cor	nducted on 11, 20 & 2	1/01/2022	
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Due to pandemic CC recruitment of foreign Kuala Jelei Estate, ther line sweeper_workers where there is evidence implemented. Records assessment and employ on interview confirm recruitment for women	workers since Marche is one female worker name Thana Letchur to that procedure for such as application for yment contract availathat there is no	n 2020 until now. For r has been recruited as my on February 2022 recruitment has been orm, approval, medical able and verified. Base	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	Bukit Dinding Estate As per conversation wider of workers, all local color in Bukit Dinding Estate recruitment on 03/02, evidence that recruitment procedure. For retired retired on 13/07/202 Retirement gratuity has agreement and complice.	mmunities s are welco. Sample has been tak /2022 for field workenent process has been takenent, sample has been to workers name Not been paid according to the same of the sam	ome to apply for works ken for application and ers position. There is en done according to en taken for workers Mr Woon Fooi Choi. to IOI/NUPW Collective	Complied

		Kuala Jelei Estate Sample of newly recruitment taken for workers name Thana Letchumy as line sweeper in on February 2022 where there is evidence that procedure for recruitment has been implemented. Records such as application form, approval, medical assessment and employment contract available and verified.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	As per stated in the guideline on reproductive health document number IOI/G/SE/002 issuance date 05/10/2020 that pregnancy test need to done monthly for workers related to chemical and 3 months once for general workers with consent from the workers itself. For Bukit Dinding Estate, sighted consent letter for 2 samples workers dated 05/01/2022 which disagree for pregnancy test.	Complied
		While for Kuala Jelei Estate, sighted all the consent letter from women workers dated 20/04/2022 disagree to conduct pregnancy test because they did not work related to chemical.	
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	The gender committees at IOI Plantation mill and estates are known as the Women Empowerment Committees (WEC). The WEC consists of all female employees, and wives of workers are also invited to join their activities. SOPs for establishment of gender committee sighted in document title: Guidelines for implementation women and empowerment committee (WEC) document reference IOI/G/SE/001 dated 17/02/2020. Stated that gender committee meeting need to be done at least twice a year.	Complied
		Review of meeting minutes and interviews held with WEC members confirmed that the WEC also provide awareness to its members on issues of concern such as sexual harassment, domestic violence, how complaints are lodged, and who to complaint to. The WEC also	

	discussed issues such as health a Meeting carried out at the respec	nd improvements for its members. tive operating units as follows:	
	Mill/estate	Date of meeting	
	Bukit Serampang Estate	15/11/21, 19/5/22	
	Regent Estate	24/11/21, 16/5/22	
	Nor Hazirah appointed as chair secretary. As per interview with meeting has been planned for even on 29/04/2022 with attendance of the meeting communication implementation on women and policy for reproductive rights and workplace. Kuala Jelei Estate Madam Musdaleha appointed empowerment committee (WEC) months interval. Latest meeting attendance of 6 female workers.	or Bukit Dinding Estate and Puan rman and Mdm. Pavitra Nair as Mdm. Pavitra, gender committee very 6 months latest meeting done of all female workers. The agenda ation of sexual harassment, empowerment committee (WEC), guideline to handle harassment at as chairman of women and and meeting conducted every 6 g conducted on 19/04/2022 with The main objective of the meeting	
		ocedure related to women and to is no issues has been highlighted orkers.	
	<u>Bahau Estate</u>		
		led Jawatan kuasa pemerkasaan attendance of all female workers.	

		The meeting chaired by Pn Norashidah as the gender committee chairman.	
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	Reviewed on the payslips of sampled workers (refer to indicator 6.2.2) in Gomali POM certification unit which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Overtime and work on rest day were paid according to Employment Act 1955.	Complied
	on 6.2: Pay and conditions for staff and workers and for contract workers a living wages (DLW).	lways meet at least legal or industry minimum standards and are suffi	cient to provide
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Applicable labour laws and documentation of pay and conditions are available to the workers. These are in the form of employment contracts (for foreign workers) and letters of employment offer (for local workers). These documents were prepared in English and in another language that the workers understand e.g. in Hindi, Bengali or Bahasa as the case may be.	Complied
		The employment contract stipulates terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave and public holidays, mutual termination of contract, facilities, etc. The sampled employment contracts were signed, and renewed accordingly.	
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955. Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is	Non- compliance

- Critical (Major) compliance -	Employment Act 1955. As at cui	um is 104 hours according to the rrent status, there was none has slips, the payment and calculation
	The overtime rate after 8 hours d	laily rated is: upkeeping
	Mon - Sat - daily rated / 8 hours	x 1.5
	Sunday - daily rated / 8 hours x 2	
	Public holiday – daily rated / 8 ho	ours x 3.0
	The overtime rate after 8 hours p	piece rated is: harvesters
	Mon - Sat – flat rate	
	Sunday – flat rate x 2.0	
	Public holiday – flat rate x 3.0 Payroll documents, namely the pay slip, also give accurate information on compensation for all work done. This includes thos who receive daily-rated wages, piece rated wages, payment for an overtime work done, and public holiday pay. Sample of pay slip checked during low crop and peak crop season as below:	
	Estate/Mill	Worker No/ID
	Gomali POM	1PIP/IOI/0207/26076
		1PIP/IOI/1220/27058
		1PIP/IOI/0794/26014
		1PIP/IOI/1221/31081
		1PIP/IOI/0422/33007
		1PIP/IOI/1019/26097

	1PIP/IOI/0719/26011
	1PIP/IOI/1116/26036
	1PIP/IOI/0512/26086
	1PIP/IOI/0116/26120
	1PIP/IOI/0215/26073
Bukit Serampang	1PIP/IOI/0619/23735
	1PIP/IOI/1215/23743
	1PIP/IOI/0919/23795
	1PIP/IOI/1119/23733
	1PIP/IOI/0519/23797
	1PIP/IOI/0817/23662
	1PIP/IOI/0617/23699
	1PIP/IOI/0320/23761
	1PIP/IOI/0519/23652
Regent Estate	1PIP/IOI/0214/23219
	1PIP/IOI/1017/23217
	1PIP/IOI/1117/23166
	1PIP/IOI/0414/23230
	1PIP/IOI/1111/23178
	1PIP/IOI/0120/23277

		1PIP/IOI/0917/23256	
		1PIP/IOI/1017/23242	
		1PIP/IOI/0918/23257	
		1PIP/IOI/0615/23125	
		1PIP/IOI/0709/23127	
	Canada of made at the factor		
	(gender, origin, types of works).	rification from various categorize Details of workers as per below	
	Bukit Dinding Estate		
	a. C5934601		
	b. AU256169		
	c. P2932640		
	d. L3120891		
	e. P2931192		
	f. 07323111		
	<u>Kuala Jelei Estate</u>		
	a. AU252957		
	b. R3409613		
	c. C3149137		
	d. BM0359587		
	Bahau Estate		
	a. Employee ID – 1PIP/IOI/09		
	b. Employee ID - 1PIP/IOI/091		
	c. Employee ID – 1PIP/IOI/09		
	d. Employee ID - 1PIP/IOI/061	.9/19802	

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

- e. Employee ID 1PIP/IOI/0519/19824,
- f. Employee ID 1PIP/IOI/0914/19777,
- g. Employee ID 1PIP/IOI/0611/19621,
- h. Employee ID 1PIP/IOI/0121/27246
- i. Employee ID 1PIP/IOI/0121/27245,
- j. Employee ID 1PIP/IOI/0718/19690
- k. Employee ID 1PIP/IOI/1115/19799,

Among permits issued by Labour Department verified;

- Overtime permit under section 60A(4)(a) for maximum limit of 130 hours, ref: BHG.PU/9/134 Jld 21(48) dated 28/6/2019 (Gomali POM)
- Salary deduction permit ref: PP3/29/030/2009 dated 1/9/2009 (Bukit Serampang Estate)
- Salary deduction permit for temple, ref: (4) PMT 10501/2018/0077 dated 24/7/2018 (Regent Estate)
- Salary deduction permit for surau (RM2), ref: PMT/10501/2016/0007 dated 11/4/2016. (Regent Estate)
- Salary deduction for electricity (TNB), ref: PMT/10501/2020/0018 dated 1/7/2020. (Regent Estate)
- Salary deduction for domestic water usage (SAINS), ref: PMT/10501/2020/0019 dated 22/7/2020. (Regent Estate)
- Salary deduction for NUPW fee, ref: (20) dlm. BSM 7/2/35/68 Jld26. (Regent Estate) dated 16/5/02

Working contract agreement between Contractor (Mega Sensasi Jaya Sdn. Bhd.) which has been appointed as FFB transporter by IOI Plantation Sdn. Bhd. and their workers (ID No: 970522-05-xxxx which has been appointed as lorry driver) does not indicate the working hours, number of days entitle for annual leave and public

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

		holidays, medical and other benefits. Thus, a major NC was raised.	
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance -	Based on review of punch cards, workers' employment contracts and payslips, evidence was available that the estates were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. mosque funds, electricity bills, etc) in accordance with the relevant laws and Labour Office permits. These permits are as detailed out under as per above.	Complied
6.2.4	(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. - Critical (Major) compliance -	All workers are provided with housing facilities that furnish with sanitation facilities, water supplies, electricity and amenities such praying house. Water and electricity are connected to the national supply and grid. Water and electricity usage is subsidized by the company and these conditions are stated in the contract. Interview with workers confirms that there is no issue related to the payment of water and electricity. IOI Corporation Berhad has established a Guidelines Providing Basic Amenities to Workers, IOI/G/SE/009 rev:01 dated 4 December 2020. The new guidelines is developed based on Act 446, Workers' Minimum Standard of Housing and Amenities Act 1990 and Workers' Minimum Standard of Housing and Amenities (Amendment) Act 2019. For example, linesite inspection were carried out on weekly basis on 20/5/22, 13/5/22, 5/5/22 and 28/4/22 and VMO visit on 11/5/22 and 18/5/22. Bukit Dinding Estate Total 44 blocks of workers quarters constructed and the oldest is in year 1983 and 6 house is under constructions and 4 houses in under refurbished. Line site inspection done by the hospital assistant and	Complied

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		latest inspection done on 07/05/2022, 11/05/2022 and 14/05/2022 and sighted finding recorded in the document title "Monitoring checklist line site effective date 07/12/2020. Kuala Jelei Estate Total 3 blocks of workers housing which been divided into foreign and local. Line site inspection has been done by VMO, Dr Thong Hon Sang on weekly basis. Samples taken on 11/02/2022, 18/02/20220 and 25/02/2022 Clinic established for each estate and under responsibilities of hospital assistant for Bukit Dinding Estate, while for Bahau Estate	
		and Kuala Jelei Estate, it is under VMO, Dr Thong Hon Sang. Surau and temple has been provided at line site for Muslim and Hindu workers. Electricity supply from Tenaga National Berhad and subsidized RM5.00/workers, water from own water treatment and drinking water supplied by the estate which collected from nearby communities.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Gomali POM and Estate management has provided foods and essential supply to the workers during the MCO period such as rice, cooking oil and other necessity. This has been confirmed with the workers through interviewed. Besides, sundry shop is available inside the estate compound. The workers can easily access to the foods and goods. They informed that the pricing of the foods and goods are reasonable and affordable.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE:	Decent living wages has been calculated as referred to studies by DR Joel D. Moore dated 02/04/2020 title Decent wages in the Malaysian Palm Oil Industry. The studies have taken into	Complied



STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE

With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, LWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).

Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.

For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage in the RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).

Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:

• Updated assessment on prevailing wages and in-kind benefits

consideration several criteria such as food, housing and Non-food non housing. As per calculation, details as per below

	Pahang (RM)	Negeri Sembilan (RM)
Food	747.55	744.04
Housing	509	540
NFNH	1,097.51	1,039.60
Gross DLW	1,577.13	1,572.73

The prevailing wage calculation has included all the in-kind benefits provided to the workers such as housing and healthcare. Until the DLW benchmark is finalized by RSPO, IOI has observed to pay the minimum wage. Summary of prevailing wage calculation under state of Johor;

DLW calculation criteria	Amount calculated in RM
NFNH	1,274.47
Total living basket	2,767.75
Gross DLW	1,559.45

	T		_
	 There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. Minor compliance - 		
6.2.7	Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal - Minor compliance -	For Bukit Dinding Estate, there is only 86 workers which permanently recruited that has been classified into origin of the workers which are local and foreigner (Bangladesh, Indonesia, Nepalese). There is 4 contractors and only for one off works. While for Kuala Jelei Estate, there is 39 workers has been recruited permanently and 50% of the workers is local workers and other foreign workers from Bangladesh, India and Indonesia. There are no contractor workers in Kuala Jelei Estate. All workers in Bahau Estate recruited as permanent workers which comes from different origin (Malaysia, Indonesia, India, Bangladesh, Nepal) with total 163 persons. It has been confirmed through interview and site visit for all estate that there is no casual, temporary and day labour	Complied
freedom	on 6.3: The unit of Certification respects the rights of all personnel to form of association and collective bargaining are restricted under law, the empl personnel.	•	_
6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented. - Critical (Major) compliance -	The statement recognising freedom of association and the right to collective bargaining is available in the IOI's Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). In this document, IOI commits to uphold the rights to freedom of	Complied

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

		association and recognize the right to collective bargaining and allow trade unions to have access to all workers. This was explained to all workers during Policy trainings conducted as follows: - Gomali Palm Oil Mill: 4/2/2022 - Regent Estate: 11/3/2022 This Policy has been demonstrably implemented based on records and observations as detailed out under Indicator 6.3.2 below.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	The JCCs comprise workers' representatives and management representatives. They discuss issues raised by the workers in a meeting called Employees' Consultative Committees (ECC). Evidence was available to show that the workers' representatives have been freely chosen by the workers themselves via an election process. Workers' representatives have been chosen to represent their nationalities, as confirmed during audit interviews.	Complied
		Sampled during the audit were Joint Consultative Committees (JCCs) meeting minutes attended by worker representatives, and management team held as follows:	
		- Gomali Palm Oil Mill: 14/4/2022. Among the issues discussed included safety, requests for extra plug points to avoid overloading, water dispenser at Mill housing, repairs of faulty fixtures and fittings at the Mill workers' housing.	
		 Bukit Serampang Estate: 14/10/21, 22/12/21, 17/2/2022, 1/4/2022, 26 March 2021, 21 Oct 2021. Among issues discussed included hotline telephone number, grievance mechanism, responsibilities as workers' representatives, etc. Refer pic. Regent Estate: 13/5/22, 23/3/22, 18/1/22, 16/11/21 	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely		Complied

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	elected representatives for all workers including migrant and contract workers. - Minor compliance -	have been freely chosen by the workers themselves via an election process and they represent their respective nationalities. This was evidenced by balloting paper for an election held in October 2020. The elected workers' representatives (Indonesians, Myanmarese, Indians, and Malaysians) were appointed for a 2-year term from October 2020 to October 2022.	
Criterio	n 6.4: Children are not employed or exploited.		
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	The IOI Group Sustainable Palm Oil Policy rev October 2020 demonstrate the commitments towards eliminate all forms of illegal, forced, bonded, compulsory or child labour. Under generic terms in the service contract, it has indicated that workers are at least 18 years old when employed; when young worker between 16-18 years old are employed, contract agreement include a clause for their protection e.g. there should be restrictions on hours of work and overtime, working at dangerous heights, with dangerous machinery, equipment and tools, transport of heavy loads, exposure to hazardous substances or processes and difficult conditions such as night work; no contract substitution; and shall have valid passport and work permits	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -		Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Master List and through interviewed with the stakeholders	Complied

6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	The IOI Sustainability Palm Oil Policy is published in the IOI Group website (https://www.ioigroup.com/Default). The continuous communication about 'no child labour' is conducted during stakeholders' consultation, internal staff training and publication of the policy on notice boards of the estates and mill. Interview with estates management confirmed the 'no child labour' is well understood. Communication of the policy for Bukit Dinding Estate done on 29//04/2022, Kuala Jelei Estate on 19/04/2022 and for Bahau Estate on 21/12/2021 with attendance of all women workers	Complied
Criterio	on 6.5: There is no harassment or abuse in the workplace, and reproductive	e rights are protected.	
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	A Policy to prevent sexual and other forms of harassment is contained in IOI's Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). This document states that the Company will promote a safe and healthy working environment that is free from sexual harassment and other hazards. In addition, IOI also has a policy known as Policy on Harassment at Workplace. Based on interviews with members of the Women's Empowerment Group and other workers, these Policies are being implemented and communicated to all levels of workforce during Policy trainings conducted as follows: - Gomali POM: 4/2/2022 - Regent Estate: 25/3/2022 The IOI Sustainability Policy is also displayed at prominent places near the office and workers' housing.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	The IOI Group Sustainable Palm Oil Policy rev October 2020 demonstrate the commitments protect reproductive health of women employees and promote women empowerment. The IOI	Complied

	- Critical (Major) compliance -	Group Sustainability Palm Oil Policy rev October 2020 is complemented with the Guidelines on Reproductive Health (Doc IOI/G/SE/002; rev 01; dated 05/10/2020). For example, briefing of policy was done on 4/2/2022 at Gomali POM and 25/2/2022 at Regent Estate and also during gender committee meeting.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	Evidence was available that needs of new mothers were assessed. Sighted during the audit were assessment form for a new mother (clinic attendant) at Regent Estate on 17/5/2021. Based in the assessment result, no additional assistance requested by the new mother. For pregnant lady, consultation process was also carried out by the management. This to monitor current status of health, EDD (expected date of delivery), ante-natal check, current working and medical conditions for the pregnant lady. The consultation for the pregnant lady was carried out on 14/5/22 and 17/5/22.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	IOI Corporation Berhad has a Grievance Procedure dated 20/1/2020. Para 4 states that the Company commits to safeguard all stakeholders involved in the grievance process against potential threats, intimidation, violence or reprisals. Furthermore, the grievance mechanism support with Whistleblowing Policy revised on October 2019. Para 4.0 stated that the complainants may choose to remain anonymous when reporting on the particular grievance). The IOI Sustainability Policy is also displayed at prominent places near the office and workers' housing. This Policy were communicated during Policy trainings conducted as follows: - Gomali POM: 4/2/2022 - Regent Estate: 25/2/2022 Additionally, IOI has also printed posters in various languages Interviews conducted with workers also confirmed their understanding of the grievance mechanism	Complied



Criterion 6.6: No forms of forced or trafficked labour are used.		
6.6.1 (C) All workers have entered into employment voluntarily and the following are prohibited: • Retention of identity documents or passports (except fo administration purposes including legalisation and renewal processes • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages - Critical (Major) compliance -	entered into employment voluntarily.	Complied

		cost of 100% if service less than 6 months and 50% if service for 6 months or more but less than 2 years. Debt bondage & withholding of wages: Based on payslips reviewed for sample workers, there was no evidence of any debt bondage and withholding of wages.	
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -	 IOI has established several related policies and procedure including: IOI Plantation Foreign Workers Recruitment Guidelines & Procedures in Malaysia dated Oct 2017. Minimum Wages & Leave Pay Policies in Malaysia dated Jan 2019 IOI Group Sustainable Palm Oil Policy dated October 2020. The implementation has been carried out and verified especially on the achievement of the minimum wages of foreign workers. Please refer to indicator 6.6.1 above for more details. 	Complied
Criterio	on 6.7: The unit of certification ensures that the working environment under	r its control is safe and without undue risk to health.	
6.7.1	(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. - Critical (Major) compliance -	Gomali POM IOI Gomali POM has appointed Safety Officers as the person responsible for all safety and health issues within the operating unit. The Mill Manager Mr. Kesavan Manohar has been appointed as the Safety & Health Chairman for Gomali POM as stated in the appointment letter dated 12/04/2022 undersigned by the Mill Controller. IOI Gomali POM conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, mill security, safety compliance by contractors, workplace	Complied

		inspection, legal compliance, safety and health trainings. Sighted	
		the latest OSH Meeting Minutes dated 31/03/2022, 20/01/2022, 26/07/2021 and 29/04/2021 were available for verification.	
		Supply Base Estates	
		IOI Gomali Certification Unit estates have appointed Safety Officers in their respective estates as the person responsible for all safety and health issues within the operating unit.	
		Bukit Serampang Estate Manager, Mr. Balamani A/L Vengadasalam was appointed as the OSH Chairman for the estate as stated in the appointment letter dated 02/01/2022 undersigned by the Plantation Controller.	
		Regent Estate Manager, Mr. Faizal bin Kamarudin was appointed as the OSH Chairman for the estate as stated in the appointment letter dated 09/08/2021undersigned by the Plantation Controller.	
		The estates conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, mill security, safety compliance by contractors, workplace inspection, legal compliance, safety and health trainings.	
		Bukit Serampang Estate	
		 Sighted the latest OSH Meeting Minutes dated 30/07/2021, 29/10/2021, 27/01/2022 and 05/04/2022 were available for verification. 	
		Regent Estate	
		Sighted the latest OSH Meeting Minutes dated 11/02/2022 and 11/05/2022 available for verification.	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in	j , '	Complied



national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.

- Minor compliance -

Injury, Chemical Spillage, Vehicle Accident, Fire Outbreak, Major Spillage, Chemical Poisoning & Prevention of Covid-19 Infection at the mill.

Gomali POM

The mill has established Emergency Response Team lead by the Mill Manager. The ERT chart and Fire Extinguisher Map were available for verification. Sighted the ERP trainings for Fire Drill Training dated 30/12/2021.

First Aid Boxes were available at separate locations in the mill assigned to trained personals responsible for dispensing the first aid items. Interview with the holders indicated that they are aware and well trained on the usage of the first aid items. First Aid Box Training by Ha was documented and verified dated 08/01/2022.

All accidents were reported and recorded in the mill with accident investigations conducted when deemed necessary. The mill has reported 11 accident cases for the year 2021 and 4 accident cases for the year 2020 as of to date. The necessary JKKP 6 forms have been submitted to DOSH and available for verification. The JKKP 8 for year ending 2021 have been submitted to DOSH and available for verification.

Bukit Serampang Estate

The estate has established Emergency Response Team lead by the Estate Manager. The ERT chart and Fire Extinguisher Map were available for verification. Fire Fighting and Fire Drill Training was conducted on 07/02/2022

First Aid Boxes were available at separate operations in the estate, handled by assigned personals responsible for dispensing the first aid items. Interview with the holders indicated that they are aware

		and well trained on the usage of the first aid items. First Aid Training was conducted on 04/02/2022 and 12/03/2022. All accidents were reported and recorded at the estate. The estate has reported 26 accident cases for the year 2021. The JKKP 6 forms have been submitted to DOSH and available for verification. The JKKP 8 form for the year ending 2022 was submitted on 13/01/2022 and available for verification.	
		Regent Estate The estate has established Emergency Response Team lead by the Estate Manager. The ERT chart and Fire Extinguisher Map were available for verification. Fire Fighting and Fire Drill Training was conducted on 13/04/2022	
		First Aid Boxes were available at separate operations in the estate, handled by assigned personals responsible for dispensing the first aid items. Interview with the holders indicated that they are aware and well trained on the usage of the first aid items. First Aid Training was conducted on 22/03/2022.	
		All accidents were reported and recorded and available for verification in the estate. The estate has reported 17 accident cases for the year 2021 as reported in the JKKP 8 form submitted to DOSH on 12/01/2021.	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -	All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals. The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers	Complied



		were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.				
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law. - Minor compliance -	Medical care is provided to all the employees. All estates have their own dispensary managed by a Hospital Assistant. The dispensary provides medical care for workers and staffs for minor injuries and sickness free of charge. Major injuries or sickness are referred to the private Clinic or Hospital where the cost is borne by the management. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for all estate visited as below				Complied
		Operating Unit	Month	Total Workers	Contribution	
		Gomali POM	Feb 2022	194	RM 7933.10	
			Mar 2022	193	RM 8619.10	
			Apr 2022	195	RM 8582.10	
		Bkt Serampang Est	Feb 2022	133	RM 3926.80	
			Mar 2022	127	RM 4134.50	
			Apr 2022	127	RM 3825.10	
		Regent Estate	Feb 2022	140	RM 4193.30	
			Mar 2022	140	RM 4932.70	
			Apr 2022	141	RM 4954.10	



6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Occupational Injuries metrics as below:	were record	ded using	the Lost Tin	ne Accident	Complied
	- Minor compliance -	Operating Unit	2021		2022		
			Cases	Days	Cases	Days	
		Gomali POM	11	61	4	12	
		Bkt Serampang Est	26	79	8	64	
		Regent Estate	17	98	5	13	
		Estate	Accident r	ecord L	TA		
		Bukit Dining estate	54	3	37.5		
		Kuala Jelei	28	1	9		
		Bahau estate	28	1	8.87 – Accid 13.21 – For Hearing impa	poisoning.	
Principl	nciple 7: Protect, conserve and enhance ecosystems and the environr	lent					
Criterio	n 7.1: Pests, diseases, weeds and invasive introduced species are effective	ely managed using appro	opriate Inte	grated Pe	st Managem	ent (IPM) tec	hniques.
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM plans for implementation is guided by IOI Group Standard Operating Procedure (StOP) For Planting of Beneficial Plants; Index No. 17.1; Dated December 2016 and Group Standard Operating Procedure (StOP) For Integrated Management of Rat Control; Index No. 10.1; Dated September 2007. Beneficial plants such as <i>Cassia Cobanensis, Antigonon Leptopus</i>			Complied		
		and <i>Tunera Subulata</i>					

		planting ratio 60:20:20 (CAT) at 20m/ha (i.e 12 m Cassia, 4m Antigonon and 4m Tunera). Records of planting of new areas and maintenance of existing areas of beneficial plants and location maps were available (predator host plant map). For Pest & Disease (P&D), census was carried out for rat damage on annual basis. Recent rat census at all estates assessed results showed attack were below threshold limit of 5%. The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the SOP operation.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -		Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -		Complied
Criterio	on 7.2: Pesticides are used in ways that do not endanger health of workers	, families, communities or the environment.	
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The justification for chemical usage was available as per SOP: 4.6 under appendix: 3.0 dated 1 Jan 2019. This justification was including chemical such as Glyphosate, 2-4D methyl amine, Metsulfuron methyl, Triclopyr butoxy ethyl, Glufosinate and etc. In addition to the above, IOI Group Sustainable Palm Oil Policy, jointly signed by Group CEO and Group Head of Sustainability, under item 4 Existing Plantation, Subheading Environmental Management states that: No use of paraquat and pesticides that are categorised as World Health Organisation Class 1A or1B.	Complied

	The use of other Class of monocrotophos) approve the MPOB list of approve can only be carried out on necessary circumstances infestation, and, with speed Highly Toxic Pesticides Reafter authorization has been after authorization has been described by the control of the contro				Board and in oil palm sion and in break and dication species Pesticides	included in plantations absolutely critical pest cified in the s Act 1974,	
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	The record of pesticid System. The record as Bukit Serampang Estat	per below		n sample e	state's SAP	Complied
	- Critical (Major) compliance -	Estate	Jan 22	Feb 22	Mar 22	Apr 22	
		Glyphosate 41%	0.36	0.48	0.43	0.71	
		Cypermethrin 16%	0.03	0.05	0.00	0.05	
		Metsulfuron Mehtyl 20%	0.01	0.01	0.01	0.02	
		Ken Aminie	0.00	0.00	0.86	0.00	
		Regent Estate					
		Chemical Name	Jan 22	Feb 22	Mar 22	Apr 22	
		Glyphosate 41%	0.40	0.40	0.40	0.40	
		Ken Amine	0.21	0.21	-	0.21	
		Cypermethrine H20	0.05	0.05	0.05	-	

7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of	Complied
		beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.	
		Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no evidence of prophylactic use of pesticides in all estates visited.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations. The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.	Complied

		,	1
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. - Critical (Major) compliance -	Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Sampled the training conducted for pesticide handlers as below: - Bkt Serampang Estate - Premixer Safe Operating Procedure Training: 19/05/2022 - Chemical Handling Safe Operating Procedure Training: 09/09/2022 Regent Estate - Chemical Spraying Training – 08/04/2022 - Chemical Mixing and Chemical Handling Training – 22/03/2022 Chemical Store Management and Spill Kit Training – 08/04/2022	Complied
7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices Critical (Major) compliance -	Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.	Complied
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through licensed scheduled waste contractor Kualiti Alam Sdn Bhd	Complied

		Sighted the empty container disposal records at the estates visited as follows: Bkt Serampang Estate SW 409: Contaminated Container; Quantity: 0.0344 Mt; Waste Code: Disposed Containers; Consignment Note Number: 2022041113EU6H4D; Date of Disposal: 11/04/2022; Waste Manager: Kualiti Alam Sdn Bhd. Regent Estate SW 409: Contaminated Container; Quantity: 0.7170 Mt; Waste Code: Disposed Containers Contaminated With Chemicals; Consignment Note Number: 2022042516E2WP7Z; Date of Disposal: 25/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.	
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No aerial spraying for pesticide were done in IOI Gomali Certification unit.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Specific Annual Medical Surveillance were conducted as below: 1. <u>Bkt Serampang Estate</u> Medical Surveillance was conducted for 10 workers on 27/02/2022 as per OSHA-USECHH 2000 requirements. The medical surveillance was conducted by Klinik Segamat (Occupational Health Doctor: HQ/08/DOC/00/545). The Medical Surveillance Report (Report Number: 021/OHD/2022) stated that all 10 workers passed the medical program and were fit to work.	Complied

		as per OSHA-USECHH was conducted by KI HQ/08/DOC/00/545).	vas conducted for 21 workers on 06/04/2022 2000 requirements. The medical surveillance inik Segamat (Occupational Health Doctor: The Medical Surveillance Report (Report 122) stated that all 21 workers passed the were fit to work.			
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	Reproductive Health; I Date: 05/10/2020. The involve handling of che and pregnant employ may be given. All chemical handlers 18 years of age as ve	had have established the Guidelines on Doc. Ref.: IOI/G/SE/002; Rev. No.: 02; Issue e guidelines states under 4.2.2; Any job which emicals are strictly prohibited for both nursing rees. Subject to availability, alternative jobs at the mill and estates assessed were above rified in the list of chemical handlers. There nt or breast-feeding women involved with in the mill and estate.	Complied		
Criterio	on 7.3: Waste is reduced, recycled, reused and disposed of in an environment	entally and socially responsible manner.				
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	and Reduction Plan which includes the identification of waste products and pollutants, Waste Generation, Action Plan & Monitoring, Documents to be Reviewed, Management Review and time bound and Person In-Charge.		and Reduction Plan which includes the identification of waste products and pollutants, Waste Generation, Action Plan & Monitoring, Documents to be Reviewed, Management Review and time bound and Person In-Charge. Among the Waste Management and Reduction Plan sampled were		Complied
		Source	Waste & Pollution			

		Tell			
		Chemical Store Chemical Spillage, Empty Containers & Used Rags			
		Linesite	Domestic Waste, Sewage, Garden Residue, Recycle Items, Motor Lube Containers, Motor Lube Spillage		
	e		Among the Waste Management and Reduction Plan sampled at the estates were as follows:		
			nt and Reduction Plan Linesite.		
		- Domestic Was Motor Lube (Fitting.			
		2. Waste Manageme	nt and Reduction Plan for Scrap Iron.		
		- Store or office	Upgrading, Old trailers, Old wheelbarrows.		
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	procedures. The procedures.	edures are fully understood by workers and	Non- compliance	
			posal of Schedule Waste as below:		
		Gomali POM	I Contoninate de Occastitus O 2256 Mil Mil I		
		Code: Disposed Waste; Consignme	I Contaminated; Quantity: 0.3356 Mt; Waste Containers Contaminated with Scheduled ent Note Number: 20220413170U15PH; Date /2022; Waste Manager: Kualiti Alam Sdn Bhd.		
		Code: Chemicals Number: 2022041	ed Chemicals; Quantity: 0.1115 Mt; Waste That Are Discarded; Consignment Note .31728K14N; Date of Disposal: 13/04/2022; Yualiti Alam Sdn Bhd		



- 3. SW 109: Electrical Waste; Quantity: 0.3356 Mt; Waste Code: Used Lamp Containing Mercury; Consignment Note Number: 2022041317BCUR3A; Date of Disposal: 13/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.
- 4. SW 104: Discarded Welding Rod; Quantity: 0.0079 Mt; Waste Code: Discarded Welding Rod; Consignment Note Number: 2022041317MF9BVY; Date of Disposal: 13/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.

Bkt Serampang Estate

- 1. SW 410: Used Filter; Quantity: 0.0032 Mt; Waste Code: Filters Contaminated with Scheduled Waste; Consignment Note Number: 2022041113MN1L6R; Date of Disposal: 11/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.
- SW 312: Waste Oil; Quantity: 0.0038 Mt; Waste Code: Oily Residue from Automotive Workshop; Consignment Note Number: 2022041113U3HRT6; Date of Disposal: 11/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.
- 3. SW 409: Contaminated Container; Quantity: 0.0344 Mt; Waste Code: Disposed Containers; Consignment Note Number: 2022041113EU6H4D; Date of Disposal: 11/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.
- 4. SW 404: Clinical Waste; Quantity: 0.0021 Mt; Waste Code: Clinical Wastes; Consignment Note Number: 2022052009FGPRUB; Date of Disposal: 20/05/2022; Waste Manager: Kualiti Alam Sdn Bhd.

Regent Estate

1. SW 305: Spent Lubricant Oil; Quantity: 0.0021 Mt; Waste Code: Spent Lubricating Oil; Consignment Note Number:

		2022042E16DCVWE7: Data of Disposal: 2E/04/2022: Wasta
		2022042516RGXW5Z; Date of Disposal: 25/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.
		2. SW 104: Use Welding Road; Quantity: 0.0010 Mt; Waste Code: Used Welding Rod; Consignment Note Number: 20220425165UFB8I; Date of Disposal: 25/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.
		3. SW 408: Contaminated Soil; Quantity: 0.0010 Mt; Waste Code: Contaminated Soil Resulting from Cleaning Scheduled Waste; Consignment Note Number: 2022042516NOSGBU; Date of Disposal: 25/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.
		4. SW 410: Oil Filter; Quantity: 0.0160 Mt; Waste Code: Spent Filters Contaminated with Scheduled Waste; Consignment Note Number: 2022042516EFBc3; Date of Disposal: 25/04/2022; Waste Manager: Kualiti Alam Sdn Bhd.
		As for domestic waste in the mill, they have engaged an external body to collect the domestic waste from the domestic waste collection waste to be brought out of the estate.
		Nevertheless, during the visit to the Gomali POM linesite, it was found that scheduled waste items such as 2T Lubricant containers have been inappropriately disposed into the field areas surrounding the housing complex. Hence a minor nonconformity was raised.
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	IOI Gomali Certification Unit does not use fire for waste disposal. Complied
Criterio	on 7.4: Practices maintain soil fertility at, or where possible improve soil fer	tility to, a level that ensures optimal and sustained yield.
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Oil Palm Agriculture Policy establish on July 2005. This SOP include to manage soil fertility to optimise yield such as section 5.0 Establish, and maintenance of legume covers and Section 8.0 Manuring. To minimise environmental impact was cover under 4.0;

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

		Soil Conservation and planting.	and terracin	ng and 1.0; Land	clearing, preparation		
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Gemenceh for all that will be under are done to dete the respective efertilizer recomme	chiar and Soil Samplings were conducted by IOI Research Centre emenceh for all estate's fields on an annual basis except those at will be undergoing replanting. The Foliar and Soil Sampling e done to determine the nutrient content in the palms and soil of e respective estates. The Research Centre then provides the retilizer recommendation for the following year based on the result the sample taken.				
		The report was finalised by the Research Centre and sent to the estates and available for verification.					
7.4.3	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.		In sample estate, the nutrient recycling strategy using Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME) was implemented. The detail such as: -				
	- Minor compliance -	Estate/F	ield	Month	POME (Mt)		
		Bkt	PM01C	Jan 2022	36.00		
		Serampang Estate	PM01G	Jan 2022	38.00		
			PM11A	Jan 2022	35.00		
			PM00B	Jan 2022	76.00		
			PM00A	Jan 2022	35.00		
		Regent Estate	PM05A	Jan 2022	1400.00		
			PM05B	Jan 2022	800.00		
			PM05C	Feb 2022	200.00		
			PM06C	Feb 2022	600.00		

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			PM06D	Mar 2022	600.00	
			PM02D	Mar 2022	80.00	
7.4.4	Records of fertiliser inputs are maintained Minor compliance -	provided by IOI	the recommendation lizer recommendation I estates. Verified the	Complied		
		Bukit Serampang				
			ield: 12A; Hed	ctarage: 47.00 H	C); Scheduled Month: a; Status: Completed;	
			Field: 20/04/	/2022; Hectarag	C); Scheduled Month: le: 39.00 Ha; Status:	
			Field: 120	A3; Hectarage:	5); Scheduled Month: 28.00 Ha; Status:	
		Regent Estate				
		1. Field: PM05E 361 Bags; To				
					ure (AC); Total Bags: pleted on 19/04/2022.	
Criterio	on 7.5: Practices minimise and control erosion and degradation of soils.					
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.- Critical (Major) compliance -	have established estate classified	soil maps ide total area a identifying s	entifying the soil and percentage.	Skt Serampang Estate series available in the The estate also has the respective estates	Complied

		, , , , , , , , , , , , , , , , , , ,	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	IOI Plantation have implemented a Standard Operating Procedure for Land Preparation for New Planting and Re-Planting (Doc Ref: IOI/SOP/A/05) dated 2007 that states under section 6.5 Hilly to steep (\leq 25° Slope) – No planting/terracing shall be carried out at a very steep terrains (\geq 25° Slope).	Complied
		During the site visit it was verified that slope of more than 25 degrees are avoided in the planting areas due to the Policy of the Company forecasting several issues during the crop recovery on maturity. No replanting has taken place on steep slopes sighted.	
7.5.3	There is no new planting of oil palm on steep terrain Minor compliance -	There was no new planting of oil palm on steep terrains in IOI Gomali Certification Unit.	Complied
Criterio operatio	n 7.6: Soil surveys and topographic information are used for site planning ns.	in the establishment of new plantings, and the results are incorporate	d into plans and
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	IOI Plantation Management has established Group Standard Operating Procedures (StOPs) for estate, under Operations Master List dated September 2007 to ensure long term suitability of land for Palm oil cultivation.	Complied
		This manual included planting density, land clearing and preparation, Leguminous cover plant, Manuring, weeding, Pest and disease, and, no planting on steep terrain and others.	
		Soil map was available for all estates as mentioned in indicator 7.5.1. Reference made to the map did not find any marginal or fragile soils within the estate area.	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if	There was no fragile soil in estates audited.	Complied
7.6.2	necessary, done in accordance with the soil management plan for best practices.		·

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are made and available in a soil map at the estates. Topographic contour map is also available which are both used to manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.	Complied
Criteri	on 7.7: No new planting on peat, regardless of depth after 15 November 20	018 and all peatlands are managed responsibly.	
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Verification done on the soil maps provided by the sampled estates indicated that there was no peat soil within the estate area. Therefore, this indicator is not applicable.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Verification done on the soil maps provided by the sampled estates indicated that there was no peat soil within the estate area. Therefore, this indicator is not applicable.	Complied
7.7.3	(C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -	Verification done on the soil maps provided by the sampled estates indicated that there was no peat soil within the estate area. Therefore, this indicator is not applicable.	Complied
7.7.4	(C) A documented water and ground cover management programme is in place Critical (Major) compliance -	Verification done on the soil maps provided by the sampled estates indicated that there was no peat soil within the estate area. Therefore, this indicator is not applicable.	Complied
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with	Verification done on the soil maps provided by the sampled estates indicated that there was no peat soil within the estate area. Therefore, this indicator is not applicable.	Complied

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7.7.6	crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance - (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance - (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and	Verification done on the soil maps provided by the sampled estates	Complied
	Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -		
Criterio	n 7.8: Practices maintain the quality and availability of surface and ground	lwater.	
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water.	IOI Gomali POM have established a Water Management Plan for the year 2021 available for verification. The purpose of the plan is to maintain the quality and availability of the natural water resources. Verified the water management plan and its implementations as below: 1. Water usage is monitored on a monthly basis by the mill and the data has been provided under indicator 7.8.4.	Non- compliance



- Minor compliance -	2. Water for consumption is treated by the mill at the Water
- Minor Compilance -	treatment Plant. The mill monitors the water quality on a quarterly basis. Sighted the water sampling results as below:
	Certificate for Analysis
	 Date of Sampling: 21/03/2022; Reference Number: SL/0322/0345; Laboratory: Spectroscience Laboratories Sdn Bhd. The results indicated that all parameters were within the permitted range for Drinking Water Quality.
	Bkt Serampang Estate
	1. Water usage is monitored on a half yearly basis by the estate. Previously water used for consumption was treated in the estate using the water source available. The latest Domestic Water Discharge Quality was conducted on 26/11/2021. The results indicated that certain specifications did not comply with the DWQS. Further clarification indicated that the water sampling for domestic consumption was not taken from the water dispenser, which was the source used by the workers. Hence, the estate could not justify that the water used for domestic consumption complies with the Drinking Water Quality Standard. Hence, a major non-conformity was raised due to this being a non-conformity reoccurrence in the same indicator.
	2. Monitoring of incoming and outgoing water course at the 8 sampling points was done twice a year by the estate management. The recent water sampling was done on 20/01/2022. The analysis was done by IOI Research Centre and the report results (Report Number: BSE/10/03/2022) was available for verification. The results indicated that the incoming
	water had high NH3N which exceeds the national Water Quality
	Standards. The estate management have investigated and

		stated that reading of the water was affected due to the dry weather and less water at the stream. 3. Riparian zones were maintained along the 4 Streams that run through the estate. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected.	
		 Regent Estate Water for domestic use is obtained by Syarikat Air negeri Sembilan. Hence workers are entitled to clean and treated water throughout the year. 	
		2. Monitoring of incoming and outgoing water course at the 6 sampling points was done twice a year by the IOI Research Centre. The recent water sampling was done on 05/03/2022. The analysis was done by IOI Research Centre and the report results (Report Number: RGE/13/04/2022) was available for verification. The results indicated that the incoming water had high NH ₃ N and COD which exceeds the national Water Quality Standards. The estate management have investigated and stated that reading of the water was affected the activities from the Quarry which is situated nearby the estate.	
		Riparian zones were maintained along the 4 Streams that run through the estate. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected.	
7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific	Gomali POM Visit to the Natural Stream A1 that passes through Gomali Estate, adjacent to the mill indicated that there was a well-established buffer zone of approximately 5 metres from the stream bank. The	Complied

	environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle. - Critical (Major) compliance -	mill in accordance with the DOE Compliance Schedule have conducted river water quality monitoring on a monthly basis. The latest river water quality monitoring was conducted on 12/04/2022 and results (Report Number: Ar-22-QB-001810-01) were available for verification and indicated all specification were within the acceptable Condition of Standard B (River) of New Sewage Treatment System. Bkt Serampang & Regent Estate Visit to the river and streams at the estates indicated that a clear buffer has been established. There were no signs of any manuring or spraying being done at the area. Signboards have been erected preventing any activities to be conducted at the area.	
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	Gomali Palm Oil Mill has license for discharge of POME through land application based on the Environmental Quality Act (Act 127) with BOD specification <2500 mg/L, Suspended solids ≤411mg/L, Oil and Grease ≤50 mg/L, Ammoniacal nitrogen <150mg/L, total nitrogen <200 mg/l and pH 5.0 - 9.0. This parameter is tested regularly by in-house lab and accredited lab and analyzed on weekly basis. There are 17 effluent ponds in Gomali Palm Oil Mill and the list of ponds, and their functions were available for verification. The monitoring of the Final Discharge point is done on a monthly	Complied
		basis. Samples are sent to NALCO Industrial Services Sdn Bhd for testing. Sampled the Results as below: 1. Sample Number: 2108/22; Report Number: EF/0142/05/22; Date Sampled: 24/03/2022; The results indicated that all	
		readings were well within the limits of discharge. 2. Sample Number: 1876/22; Report Number: EF/0142/03/22; Date Sampled: 18/02/2022; The results indicated that all readings were well within the limits of discharge.	



7.8.4 Mill water use per tonne of FFB is monitored and recorded.

- Minor compliance -

IOI Gomali POM has been monitoring its water usage on daily basis. The water was sourced from the nearby water catchment pond Based on the monthly records, the monthly usage of water in 2021 is as follows:

Sis. Complied

13 43 10110143.					
Month	Water (m³)	Water (m³)/ FFB (mt)			
Jan 2021	17,638	0.88			
Feb 2021	34,625	0.77			
Mar 2021	55,913	0.77			
Apr 2021	76,552	0.76			
May 2021	99,439	0.94			
Jun 2021	112,877	0.80			
Jul 2021	133,842	0.81			
Aug 2021	153,698	0.85			
Sept 2021	174,918	0.74			
Oct 2021	194,024	0.80			
Nov 2021	211,196	0.76			
Dec 2021	226,202	0.95			

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



7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -		efficiency of fossil fue Plan for Gomali POM. erating unit were:		
			n FFB ramp balance to co the diesel engine running		
		Optimise the die of the boiler	sel engine only running f	or start and stoppage	
		Optimise the biogas engine to supply energy to reduce diesel engine hour			
		4. Timely service of diesel-powered tractors and machinery to ensure efficient use of diesel & avoid leakages.			
		5. Regular servicing of turbine for a better efficiency and to minimise running of gen-set.			
		6. Educate employees on fuel saving practices			
		recorded. The data is	sel for the mill and est compiled for comparison n of gradual reduction of	and control for future	
			monitoring records for all and contractor) as foll		
		Month	Diesel (L)	Electricity (kWh)	
		Jan 2021	20,347.00	579,602	
		Feb 2021	3,571.00	1,021,162	
		Mar 2021	48,737.00	1,628,339	
		Apr 2021	64,657.00	2,042,303	
		May 2021	87,737.00	2,736,981	



Jun 2021	108,113.00	3,055,853
Jul 2021	117,147.00	3,563,724
Aug 2021	124,551.00	4,087,157
Sep 2021	133,167.00	4,585,783
Oct 2021	141,673.00	5,037,780
Nov 2021	148,863.00	5,356,104
Dec 2021	155,090.00	5,738,717

Sighted the sampled monitoring records for diesel, electricity and water usage for FY 2021 (estate and contractor) as follows:

<u>Bukit Serampang Estate</u>

Month	Diesel	Water	Electricity (kWh)
Jan 2021	11,704	2,790	9,461
Feb 2021	7,956	2,610	13,248
Mar 2021	8,467	2,790	13,050
Apr 2021	8,231	2,700	13,952
May 2021	8,301	2,790	12,877
Jun 2021	8,836	2,700	14,716
Jul 2021	9,051	2,790	13,709
Aug 2021	8,520	2,790	13,652

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

Sept 2021	8,318	2,700	13,903
Oct 2021	8,451	2,790	13,318
Nov 2021	8,395	2,700	12,248
Dec 2021	8,219	2,790	12,086
Regent Estate			_
Month	Diesel	Water	Electricity (kWh)
Jan 2021	7,967	7,932	36,597
Feb 2021	7,715	8,311	34,997
Mar 2021	6,157	9,405	39,191
Apr 2021	7,054	8,339	38,987
May 2021	7,476	8,210	38,939
Jun 2021	6,645	9,300	38,731
Jul 2021	7,076	7,440	38,640
Aug 2021	6,508	7,711	39,250
Sept 2021	5,332	7,965	38,532
Oct 2021	6,719	8,656	41,125
Nov 2021	5,985	8,455	39,571
Dec 2021	5,902	7,895	38,448

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

7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SO ₂ and NO ₂ from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities. The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4.			Choose an item.
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	No New Development in Gomali Certification Unit.			Choose an item.
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	All polluting activities were assessed through the aspect and impact method and were documented. The activities are inclusive of green gas emissions, chemicals, fertilizer, scheduled waste, solid waste and household waste. Data relating to such activities were collected, analysed and presented during the environmental meetings held by the mill. Sampled the Stack Emission Monitoring for the Mill Boiler as below: Facility: Boiler 2 – Chimney No.1 (Date: 25/03/2022)			Choose an item.
		Parameter	Results	Limit Value	
		Total Particulate Matter (mg/m³)	137.5	150	
		Sum of SO and SO ₃ expressed as NO ₃ (mg/m ³)	22.1	400	
		Sum of NO and NO ₂ expressed as NO ₂ (mg/m³)	201.3	400	

RSPO P&C Public Summary Report Revision 13 (Apr 2022)

		Dark Smoke	Ringelmann Chart No.1	Ringelmann Chart No.1	
		Facility: Boiler 2 – Chimney No.1 (D	ate: 30/09/202	1)	
		Parameter	Results	Limit Value	
		Total Particulate Matter (mg/m³)	116.0	150	
		Sum of SO and SO ₃ expressed as NO ₃ (mg/m³)	169.1	400	
		Sum of NO and NO ₂ expressed as NO ₂ (mg/m³)	131	400	
		Dark Smoke	Ringelmann Chart No.0	Ringelmann Chart No.1	
Criterio	n 7.11: Fire is not used for preparing land and is prevented in the manage	ed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance -	Based on Guideline on Group's Long-Term Replanting Planning [A/016-05/2018, dated 20/6/2018], burning is restricted during replanting. Visit to the sampled estates indicated that there were no traces of burning at replanting areas. Palms were felled, chipped, shredded and used as mulch at the estates.			Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	IOI Corporation Berhad have established an IOI Group Fire Management Guidelines; Doc Ref: IOI/G/EV/012; rev No: 0; Issue Date: 08/01/2021 that addresses the Post Fire Analysis Programmes, Fire Prevention and Monitoring and Fire Emergency Response. The Guidelines were available at all estates for verification.			Complied
		Emergency Response Team are made available at each Operating Unit and have trained for fire prevention and control measures with their estate. Fire Drill and Fire Fighting Trainings were conducted at			

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		the respective estates to all workers. Verified the training records for all estates available.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	During external stakeholder meeting that was carried out at each Operating centre (Estate & Mill), all stakeholder including neighbour was briefed on fire prevention and control measures. Besides that, all operating centres also been prepared Emergency Response Plan (Fire in Field/ Peat Areas in Own or Neighbouring Estate). Verified the stakeholder meeting records as below: 1. Stakeholder Meeting on Fire Engagement and Control measures at Bkt Serampang Estate dated 26/04/2021. 2. Stakeholder Meeting at Regent Estate dated 12/05/2022.	Complied
	on 7.12: Land clearing does not cause deforestation or damage any area rorest. HCVs and HCS forests in the managed area are identified and protect		h Carbon Stock
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any		Complied
	new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -		



	stakeholder consultation and take into account wider landscape-level considerations. PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -	Regent Estate HCV Assessment Report 2022 was available for verification for the estate, prepared on 17/08/2009 and reviewed on April 2022. The Report states that there are 2 rivers (6.253 Ha) that flow through the estate and Forested Steep (0.16 Ha) classified as HCV 4. There are also conservation areas in the estate which are natural stream's riparian reserve and rocky surface steep areas.	
7.12.3	Indicator is not applicable in Malaysia context	Not Applicable	Complied
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -	HCV and Biodiversity assessment have been conducted and the HCV Reports were available for verification. Based on the identified HCVs, the management have implemented the HCV Management Plan where they have identified the possible threats that could arise at the HCVs and the Management and Monitoring of the areas. Among the observations recorded were possible encroachment or sign of trespassing, wildlife issues or sightings, pollution or erosion issues. Based on the verification of the provided photographs, it was sighted that the signages on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the area. All the signages were noted to be well maintained. Buffer zones were demarcated along the rivers and catchment area banks and no indication of chemical or fertilizer application were sighted. Regular monitoring of incoming and outgoing water quality was monitored at rivers that pass through the estates. Slopes declared as steep terrains (>25°) were left abandoned. Regular patrolling by the estates Auxiliary Police were done at HCV areas to monitor on trespassing and RTE species with the patrolling records available for verification.	Complied



The estates continue to train the workers and staffs on HCV and RTE Species. Verified the training on HCVs and biodiversity awareness records available for the estates.

Bukit Serampang Estate

- 1. HCV Assessment Report 2022 was available for verification for the estate, prepared on 20/05/2009 and reviewed on May 2022. The Report states that there are 4 rivers (6.253 Ha) that flow through the estate and are classified as HCV 4. There are also conservation areas in the estate which are natural stream's riparian reserve and worshiping areas.
- 2. An HCV Management Plan has been established in the estate to protect the identified HCVs in the estate. The HCV Management Plan mainly highlights the action plans to conserve the identified HCVs.
- 3. Visit to the river at PM01F indicated that a clear buffer has been established. There were no signs of any manuring or spraying being done at the area. Signboards have been erected preventing any activities to be conducted at the area.

Regent Estate

- 1. HCV Assessment Report 2022 was available for verification for the estate, prepared on 17/08/2009 and reviewed on April 2022. The Report states that there are 2 rivers (6.253 Ha) that flow through the estate and Forested Steep (0.16 Ha) classified as HCV 4. There are also conservation areas in the estate which are natural stream's riparian reserve and rocky surface steep areas.
- 2. An HCV Management Plan has been established in the estate to protect the identified HCVs in the estate. The HCV Management Plan mainly highlights the action plans to conserve the identified HCVs.

		3. Visit to the stream at PM05A indicated that a clear buffer has been established. There were no signs of any manuring or spraying being done at the area. Signboards have been erected preventing any activities to be conducted at the area.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	It was verified that there were no HCVs, HCS forests identified after 15 November 2018 where rights of local communities had been identified. The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	IOI Gomali Certification Unit estates have conducted a Rare, Threatened and Endangered Species (RTE) assessment for their respective estates. The assessment states the mechanism for RTE monitoring and reporting, wildlife monitoring records and awareness on RTE wildlife species. The implementations of the RTE measures are as below: 1. RTE Species Training Bkt Serampang Estate – 19/01/2022 Regent Estate Wildlife Training - 09/02/2022 2. Estate's management have displayed posters on RTE species and briefed all workers on the importance to protect the wildlife. Estates have implemented a Wildlife Monitoring Record book for recording of any sightings of wildlife in the estates.	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the Senior Managers and Plantation Controllers and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.	Complied



7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	affecting present HCV and primary forest. There were no land	
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for Gomali 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:

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

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

Emission per product	tCO₂e/tProduct
СРО	1.52
РКО	0

Extraction	%
OER	21.91
KER	4.54

Production	t/yr
FFB Process	277,844.36
CPO Produced	60,886.22
PKO Produced	0

Land Use	На
OP Planted Area	27,892.00
OP Planted on peat	0
Conservation (forested)	35.44
Conservation (non-forested)	158.66
Total	28,086.1

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	154,651.06	0.58	4,779.16	0.47	0	0	159,430.22	1.05
CO ₂ Emission from fertilizer	14,913.45	0.06	469.85	0.05	0	0	15,383.29	0.11
NO ₂ Emission	7,876.50	0.03	259.72	0.03	0	0	8,136.22	0.06
Fuel Consumption	1,885.20	0.01	65.14	0.01	0	0	1,950.34	0.02
Peat Oxidation	0	0.00	0	0	0	0	0	0
Sink	Sink							
Crop Sequestration	-143,290.92	-0.54	-4,460.81	-0.44	0	0	-147,751.73	-0.98
Conservation Sequestration	0.00	0.00	-1.44	-0.00	0	0	-1.44	0
Total	36,035.28	0.13	1,111.62	0.11	0	0	37,146.90	0.24

*Note: Includes both estates and smallholders



Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB			
Emission					
POME	86,077.90	0.31			
Fuel Consumption	483.88	0			
Grid Electricity Utilization	0	0			
Credit					
Export of Grid Electricity	0	0			
Sales of PKS	-12,002.32	-0.04			
Sales of EFB	0	0			
Total	74,559.46	0.27			

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

^{*}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					



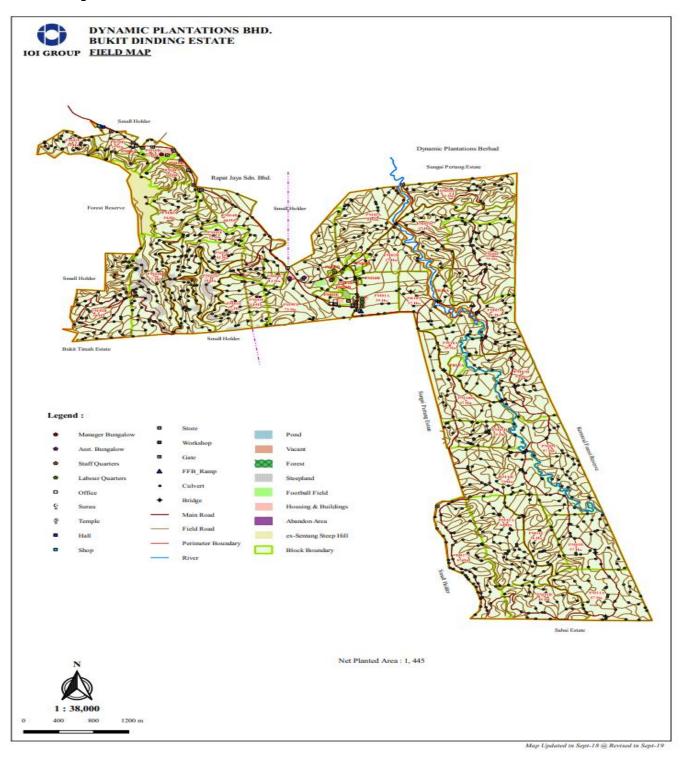
Appendix C: Location Map of Certification Unit and Supply bases





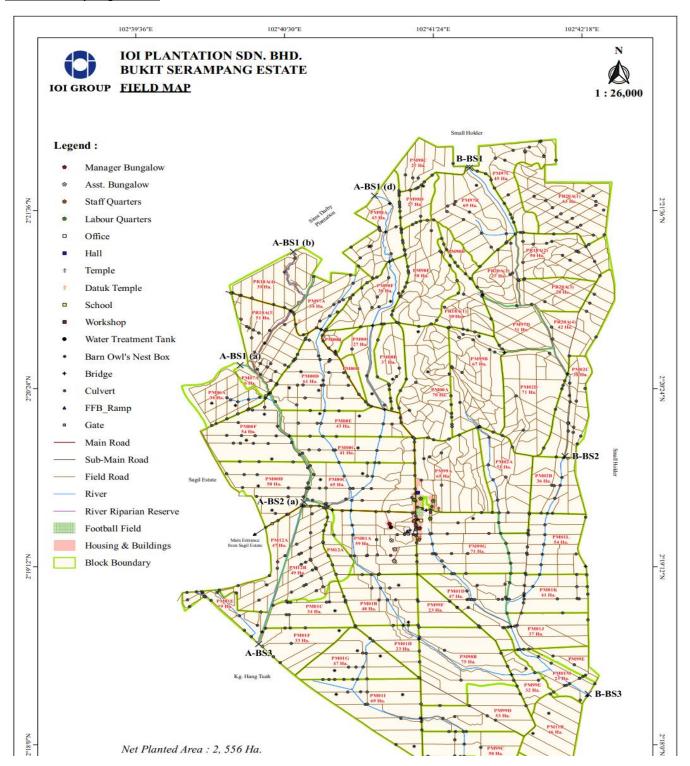
Appendix D: Estate Field Map

Bukit Dinding Estate





Bukit Serampang Estate



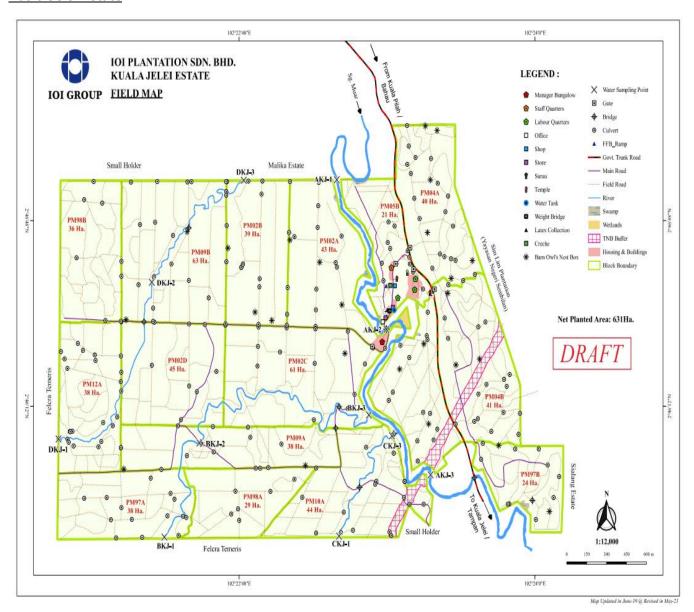


Bahau Estate





Kuala Jelei Estate





Regent Estate





Appendix E: List of Smallholder Registered and/or sampled

Not applicable

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



Appendix F: List of Abbreviations

a.i Active Ingredient

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment

COD Chemical Oxygen Demand

CPO Crude Palm Oil

CSPO Certified Sustainable Palm Oil
CSPKO Certified Sustainable Palm Kernel Oil

EFB Empty Fruit Bunch

EHS Environmental, Health and Safety
EIA Environmental Impact Assessment
EMS Environmental Management System

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

GMP Good Manufacturing Practice
GPS Global Positioning System
HCV High Conservation Value
IPM Integrated Pest Management

IP Identity Preserved

IS - CSPO Independent Smallholder Certified Sustainable Palm Oil

IS – CSPKO Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE Independent Smallholder Certified Sustainable Palm Kernel Expeller

ISCC International Sustainable Carbon Certification

ISS Independent Smallholder Standard

LD50 Lethal Dose for 50 sample

MB Mass Balance

MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable on Sustainable Palm Oil

P&C Principles & Criteria

RTE Rare, Threatened or Endangered species SCCS Supply Chain Certification Standard

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure