

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

□ Initial Assessment
⋈ Annual Surveillance Assessment (1_4)
☐ Recertification Assessment (Choose an item.)
☐ Extension of Scope

Client Company name (Parent Company): IOI Corporation Berhad

Client company Address:
IOI City Tower 2, Lebuh IRC, IOI Resort City
62502 Putrajaya, Malaysia

Certification Unit:

Ladang Sabah Sdn Bhd-Ladang Sabah Palm Oil Mill

Location of Certification Unit: Mile 45, Sandakan/ Telupid Road, WDT 164, 90009 Sandakan, Sabah, Malaysia

Date of Final Report: 10/04/2022



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Section 1: Scope of the Assessment

1. Company Details					
Parent Company	IOI Corporation Berhad				
RSPO Membership Number	2-0002-04-000-00 Membership 17/05/2004 Approval Date				
Address	IOI City Tower 2, Labuh IRC, IO	I Resort City, 62	502 Putra	jaya, Malaysia.	
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Ladang Sabah Sdn Bhd- Ladang	Sabah Palm Oil	Mill		
Location / Address	Mile 45, Sandakan-Telupid Road,	WDT 164, 9000	09, Sanda	kan, Sabah, Malaysia.	
Website	www.ioigroup.com				
Management Representative	Mr. William Siow Sr. Sustainability Manager, Plantation Division, IOI HQ E-mail william.siow@ioigroup.com				
Telephone	+603-8947 6755 (IOI HQ)	Facsimile	+603-89	432266 (Head Office)	

2. Certification Informat	tion			
Certificate Number	RSPO 687135	Certificat	e Start Date	03/04/2018
Date of First Certification	03/04/2013	Certificat	e Expiry Date	02/04/2023
Scope of Certification	Production of Palm oil and Pa	ılm Kernel		
Visit Objectives	- Determination of the confo	ormity of the	e client's managemen	t system, or parts of it,
	 Evaluation of the ability of meets applicable statutory, 			
Assessment Cycle	☐ Pre Assessment (Choose an item.)			
	☐ Initial Assessment			
	⋈ Annual Surveillance Assess	sment (ASA	1_4)	
	☐ Recertification Assessment (Choose an item.)			
	☐ Scope Extension			
Applicable Standards /	RSPO Certification System for	r P&C and R	SPO ISH 2020	
Normative Reference	☐ RSPO P&C 2018 for the Production of Sustainable Palm Oil			
Supply Chain Module	☑ Identity Preserved; ☐ Mas	ss Balance	Mill Capacity	90
ISH certification Phase	☐ Eligibility ☐ Milestone A	☐ Milestone	B 🗵 Not Applicable	



3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
EU-ISCC-Cert_ID218- 20210134	ISCC EU	PT Intertek Utama Services	10/08/2022			
MSPO 723824	MSPO 2530-3:2013 Part 3: General Principles for Oil Palm Plantations & Organised Smallholders	BSI Services Malaysia Sdn. Bhd.	19/06/2023			
MSPO 723823	MSPO 2530-4:2013 Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn. Bhd.	19/06/2023			
MSPO 712340	MSPO Supply Chain Certification Standard	BSI Services Malaysia Sdn. Bhd.	29/05/2024			

4. Location(s) of Mill & Supply Bases					
Name (Mill / Supply Base / Group Manager /	Location	GPS Coordinates			
Smallholders)		Latitude	Longitude		
Ladang Sabah Palm Oil Mill	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°43′47.96″ N	117°34′39.90″ E		
Bimbingan 1 Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°37′16.55″ N	117°26′45.30″ E		
Bimbingan 2 Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°37′10.63″ N	117°25′22.59″ E		
Labuk Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°40'13.35"N	117°29'55.92"E		
Laukin Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°46′42.49″ N	117°31′56.76″ E		
Luangmanis Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°45′47.98″ N	117°36′22.93″ E		
Moynod Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°44′26.94″ N	117°33′37.38″ E		
Terusan Baru Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°45′53.37″ N	117°36′37.14″ E		
Sungai Sapi Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05°48′27.13″ N	117°31′1.21″ E		



5. Description of Supply Base						
New Planting Development	⋈ No (no change in	total planted area	a) Yes (please refer to Principle 7 for detail			
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Bimbingan 1 Estate	1,716	0	221.39	1,937.39	88.31	
Bimbingan 2 Estate	1,727	0	228.61	1,955.61	88.31	
Labuk Estate	2,320	70.71	277.79	2,668.50	86.94	
Moynod Estate	2,677	0	366.71	3,043.71	87.95	
Luangmanis Estate	2,439	0	274.29	2,713.29	89.89	
Terusan Baru Estate	2,179	60.95	263.58	2,503.53	87.04	
Laukin Estate	1,893	0	235	2,128.00	88.96	
Sungai Sapi Estate	1,204	33.72	61.58	1,299.30	92.67	
Total	16,155.00	165.38	1,928.95	18,249.33	88.50	

6. Plantings & Cycle							
Estato / Carallhaldava		Age (Years)					Toronostrura
Estate / Smallholders	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
Bimbingan 1 Estate	976	479		261		740	976
Bimbingan 2 Estate	1,400	54		273		327	1,400
Labuk Estate	258	149	1,913			2,062	258
Moynod Estate	687	365		1,625		1,990	687
Luangmanis Estate	516	370			1,553	1,923	516
Terusan Baru Estate	346	1074	156		603	1,833	346
Laukin Estate	549			1,344		1,344	549
Sungai Sapi Estate	354			735	115	850	354
Total (ha)	5,086	2,437	2,069	4,238	2,271	11,064	5,086

7. Summary of Certified Tonnage of FFB (Own Certified Scope)						
Tonnage / year						
Estate / Smallholders	Estimated last year (Apr 21-Mar 22)	Act (<i>March 2021</i>	ual – <i>Dec 2021</i>)	Forecast (<i>Apr 22-March 23</i>)		
	Previous license period Current license period					



		(Mar 2021)	(Apr-Dec 2021)	
Bimbingan 1 Estate	10,670	864.68	8,786.23	14,006
Bimbingan 2 Estate	17,490	777.53	5,103.84	3,058
Labuk Estate	52,282	2,533.07	40,733.92	58,753
Moynod Estate	47,549	2,612.85	30,487.94	48,237
Luangmanis Estate	38,163	2,381.72	26,604.54	36,727
Terusan Baru Estate	37,080	2,354.76	33,512.07	44,725
Laukin Estate	28,416	1,731.32	21,179.64	23,509
Sungai Sapi Estate	18,464	1,131.99	14,358.56	17,523
Total	250,114	195,154.66		246,538

8. Summary of Certified Tonnage of FFB (from other certified unit(s))					
	Tonnage / year				
Estate / Smallholders	Estimated last year (Apr 21-Mar 22)	Act (<i>March 2021</i>	Forecast (<i>Apr 22-March 23</i>)		
		Previous license period (Mar 2021)	Current license period (Apr-Dec 2021)		
Linbar 1 Estate			2,388.97		
Linbar 2 Estate			1,442.77		
Sakilan Estate			0		
Total		3,83	1.74		

9. Summary of Non-Certified Tonnage of FFB (outside supplier — excluded from certificate)						
	Tonnage / year					
Out growers / smallholders	Estimated last year (Apr 21-Mar 22)	Act (<i>March 2021</i>	Forecast (<i>Apr 22-March 23</i>)			
		Previous license period (Mar 2021)	Current license period (Apr-Dec 2021)			
Nil						
Total						

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	Mar 2021	14,387.92	0	14,387.92	
2	Apr 2021	16,823.80	0	16,823.80	
3	May 2021	19,975.34	0	19,975.34	
4	June 2021	21,221.89	0	21,221.89	
5	July 2021	19,759.17	0	19,759.17	
6	Aug 2021	19,844.48	0	19,844.48	
7	Sept 2021	Sept 2021 25,766.80 0		25,766.80	
8	Oct 2021	21,575.67	0	21,575.67	
9	Nov 2021	21,374.74	0	21,374.74	
10	Dec 2021	18,256.59	0	18,256.59	
	TOTAL	198,986.40	0	198,986.40	

10. Summary of Certified Tonnage (not applicable for ISS)							
Estimated last year (Apr 21-Mar 22)	Ac (<i>March 202</i>	Forecast (<i>Apr 22-March 23</i>)					
FFB	i	FFB	FFB				
	Previous license period (Mar 2021)	Current license period (Apr-Dec 2021)					
250,114 mt	14,387.92 mt	184,598.48 mt	246,538 mt				
	198,9						
CPO (OER: 21.00 %)	CPO (OEF	CPO (OER: 21.00%)					
F2 F24t	2,926.82 mt	38,108.60 mt	51,773 mt				
52,524 mt	41,03						
PK (KER: 5.5 %)	PK (KER: 5.10 %)		PK (KER: 5.5%)				
12 010 mt	700.08 mt	9,441.25 mt	12 F60 mt				
13,919 mt	10,141.33 mt		13,560 mt				

10A.	10A. Monthly Records of Certified CPO & PK since the last audit						
No. Month - Year Certified CPO (mt) Certified PK (mt)							
1	Mar 2021	2,926.815	700.087				
2	Apr 2021	3,514.441	827.104				
3	May 2021	4,051.941	1,028.241				

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4	June 2021	4,284.887	1,068.420
5	July 2021	3,953.762	982.646
6	Aug 2021	4,090.157	1,015.31
7	Sept 2021	5,478.675	1,352.83
8	Oct 2021	4,640.461	1,121.97
9	Nov 2021	4,397.153	1,098.62
10	Dec 2021	3,697.125	946.10
	TOTAL	41,035.42	10,141.33

11. Summary of Actual Volume sold								
Current License period (Apr-Dec 2021)								
	DSDO Contified	Other Scher	nes Certified	Conventional	Total			
	RSPO Certified	ISCC	Others	Conventional	Total			
CPO (MT)	33,379.02	ı	-	373.31	33,752.33			
PK (MT)	8,561.50	ı	-	-	8,561.50			
Credits	-	-	-	-	-			
Previous Li	cense period (<i>Mar 202</i>	? 1)						
CPO (MT)	2,100.96	-	-	-	2,100.96			
PK (MT)	680.57	-	-	-	680.57			
Credits	-	-	-	-	-			

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)							
No. Buyers Name Palmtrace Trading Certified CPO Sold License Number (mt)				Certified PK Sold (mt)			
1	IOI Commodity Trading Sdn Bhd	RSPO_PO1000003601	35,479.98	9,242.07			
	TOTAL 35,479.98 9,242.07						

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)						
No. Buyers Name Scheme Name CPO Sold PK Sold (mt)						
1	N/A			-		
	TOTAL -					

11C. Records of CPO & PK Sold as conventional since the last audit (if any)



No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	Company A	373.31	N/A	
	TOTAL	373.31		

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

12. Independent Smallholders Certified Tonnage / Volume										
	Estimated last year (<i>N/A</i>)				Actual (<i>N/A</i>)			Forecast (<i>N/A</i>)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B	
Pilase	40%	70%	100%	40%	70%	100%	40%	70%	100%	
FFB										
IS-CSPO										
IS-CSPKO										
IS-CSPKE										

13. Independent Smallholders Actual Sold Tonnage / Volume								
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE		
Current L	icense period	(April – Dec 202	21)					
Credits	Credits Nil Nil Nil							
Physical	Nil	Nil	Nil					



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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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)

Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 24-27/1/2021. 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 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							
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)		
Ladang Sabah POM	√	√	√	√	√		
Bimbingan 1 Estate			√		√		
Bimbingan 2 Estate			√				
Labuk Estate	√		√				
Moynod Estate	√			√			
Luangmanis Estate		√		√			
Terusan Baru Estate		√			√		
Laukin Estate		√			√		
Sungai Sapi Estate	√			√			

Tentative Date of Next Visit: January 2, 2023 - January 6, 2023

Total Number of Mandays: 12

2.2 **BSI Assessment Team**

Name	Role	Competency
Muhamad	Team Leader	Education:
Naqiuddin Mazeli		Bachelor Science Horticulture, UPM
(MNM)		Work Experience:
		11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company.
		Training attended:
		ISO 9001: 2015 LA Training(2019), ISO 14001: 2015 LA Training (2018), ISO 45001: 2018 LA Training (2018), HCV & HCS Training (2019), RSPO P&C LA Training(2018), MSPO LA Training (2018), SMETA Training (2021), RSPO SCCS LA (2018), SCCS Refresher Training (2019).
		Aspect covered in this audit:



	1				
		During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, Smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.			
		Language proficiency:			
		Fluent in in both verbal/written Bahasa Malaysia and English Language.			
Nicholas Cheong	Team Member	Education:			
(NC)		Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia Work Experience:			
		He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years.			
		Training attended:			
		He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labor & Ethic Lead Auditor Course and MSPO Awareness Training.			
		Aspect covered in this audit:			
		During this assessment, he assessed on the aspects of legal, social and stakeholder engagement.			
		Language proficiency:			
		Able to communicate in Bahasa Malaysia and English.			
Nor Halis Abu Zar	Team Member	Education:			
(NHA)		Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara in 2012.			
		Work Experience:			
		He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.			
		Training attended:			
		He has completed ISO IMS 9001 and 14001 Lead Auditor Course in January 2019, MSPO 2530:2013 Lead Auditor Course in February 2019, Endorsed RSPO Lead Auditor Course in October 2020, CQI and IRCA Certified ISO 45001 Lead Auditor Course in June 2021, ISO 9001:2015 Lead Auditor Course in April 2019, MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021			
		Aspect covered in this audit:			
		During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, legal requirements, Safety and Health			



	Language proficiency:
	Fluent in Bahasa Malaysia and English Language.

Accompanying Persons:

Name	Role
Nil	

1.3 Assessment Plan

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

Date	Time	Subjects	(MNM)	(NC)	(NHA)
Sunday, 23/01/2022		Travelling from Kuala Lumpur to Sandakan	√	√	√
Monday, 24/01/2022	0900 - 0930	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	V	√	√
Laukin Estate	1030 - 1230	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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	V	√	√
		Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		√	
	1230 - 1330	Lunch break	√	√	√
	1330 - 1630	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	√	√	√



Date	Time	Subjects	(MNM)	(NC)	(NHA)
Tuesday, 25/01/2022 Ladang Sabah POM	09.00 - 1230	Ladang Sabah 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.	V	√	√
		Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		√	
	1230 - 1330	Lunch break	√	√	√
	1330 - 1630	Visit to laboratory, weighbridge and palm product storage area. • Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP &	√	√	√
		implementation etc. Assessment and documentation review on: Social aspects, legal requirements, employees' welfare and stakeholder management		√	
	1630 - 1700	Closing Meeting	√	√	√
Wednesday, 26/01/2022 Bimbingan 1	0900 - 1230	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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	√	√	√
Estate		Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		√	
	1230 - 1330	Lunch break	√	√	√

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Date	Time		Subjects	(MNM)	(NC)	(NHA)
	1330 1630	-	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	√	√	√
Thursday, 27/01/2022 Terusan Baru Estate	0900 1230	-	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, Scheduled waste management, worker housing, clinic, Landfill, , etc. Consultation with relevant stakeholders which consists of various categories such as	√	√ √	√
	1220		government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.			
	1230 1330	-	Lunch break	√	√	√
	1330 1600	-	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	√	√
	1600 1630	-	Audit team discussion & preparation for closing meeting	√	√	√
	1630- 1700		Closing meeting for RSPO P&C	√	√	√



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. Please refer to IOI 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?	The certification was still in progress and target was on year 2023 as per time bound plan. Please refer to IOI Time Bound Plan updated as of 31 st December 2021 and IOI ACOP 2020 under Time Bound Plan which was submitted to RSPO.	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.	No new acquisition.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No deviation from the period	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. Please refer to IOI Time Bound Plan updated as of 31 st December 2021 and this is consistent to IOI ACOP 2020 under Time Bound Plan section (page 10) which was submitted to RSPO.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No. Please refer to IOI Time Bound Plan updated as of 31st December 2021.	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. Please refer to IOI Time Bound Plan updated as of 31st December 2021.	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.	No replacement after dates defined in RSPO P & C MYNI 2019	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	IOI concession in Indonesia PT. KPAM had undergo the NPP process prior to any new planting. Please refer to IOI latest Time Bound Plan updated as of 31st December 2021.	Complied



	IOI Group - PT. Kalimantan Prima Agro Mandiri New Planting Procedures Public Consultations • 13 April 2018 IOI Group - PT. Kalimantan Prima Agro Mandiri has proposed new planting area located in the Sukaramai Village, Kendawangan and Manis Mata Subdistrict, Ketapang 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).	
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.	Settlement on the dispute over land ownership in Tinjar Long Lapok is still in progress through the engagement programme. Please refer to IOI latest Time Bound Plan updated as of 31st December 2021. 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 Website: https://www.ioigroup.com/Content/S/S Progress	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported as per verification.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported and found during the onsite audit.	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. As per below:- PT. BSS, PT. SKS & PT. BNS internal audit conducted on 3-13/3/2021 by sustainability team.	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?	Yes refer as per indicator 1.1.4 for details	Complied



Progress of scheme smallholders and/or outgrowers 3.2

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	Complied					
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

Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd (31st DECEMBER 2021)

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	Recerification audit: 30% remote audit done in Aug'21. Pending for follow-uponsite 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	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
					completed in	
					November 2021.	
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
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

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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
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 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 resolution process	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 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.

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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
						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 2) 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 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

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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
						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, started in August 2019. Technical assistance to the affected communities is being provided by CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point, the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Informa Clause 4.5.1 RSP	ition on Minimum Requirements for Multiple Management Unit O Certification Systems for Principles & Criteria
						RSPO Boundtable on Sustainable Palm Ol	
						IOI PEI	ELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad) (Respondent)
						,L	_ocal Community of Long Teran Kanan & NGO (Grassroots) (Complainant) COMPLAINT PROGRESS
							COMPLAINT BACKGROUND
						Complaint Reference	NA NA
						Status	Investigation
						Respondent	IOI PELITA PLANTATION SDN BHD (a subsidiary of (OI Corporation Berhad))
						Complainant	Local Community of Long Teran Kanan & NGO (Grazeroots)
						Date Complaints Submitted	15 Mar 2010
						Date Complaints Accepted	NA .
						Membership Sector	Processors and / or Traders
						Location of Complaint	Malaysia
						Region / District / Province	Min, Sarawak
						Summary of the Complaint	Synopsis
							Land comited. CIO Coverable medication process for near confluences auspended in 14/11. Both particle have agreed for medication. Medicator has been expaged through the mSEPO Dissolate Settlement Facility. Medication process Stage 1 Negation. Sequence 2011 and its organity programs of the process of the



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status			quirements for Multiple Mana ems for Principles & Criteria	gement Units,
							COMPLAINT UPDAT	E	
						DATE	UPDATE	DOCUMENTS	
						15 Dec 2021	Pending update on negotiations.		
						29 Sep 2021	Pending report from Complaints Desk and delibera	tion by the CP.	
						25 Aug 2021	Pending report from the Complaints Desk.		
						28 Jul 2021	The Respondent has invited the RSPO Secretariat to phase of negotiation and witness the process of the agreement by the communities.		
						23 Jun 2021	The Complaints Desk had a meeting with represent The Respondent have also forwarded to the Compl documents. They are currently being reviewed by t	laints Desk some supporting	
						25 May 2021	The Secretariat's review is underway. The Secretariat to reach out to the Respondent on	updates.	
						Further and u		e could be access through the link	below;
						(a) (b) (c)		<u>solution Plan</u> lita Land Dispute Resolution Proce /Content/MEDIA/M Media?Catego	
						(d)	RSPO Case Tracker – IOI P	-	··· <u>*</u>
						(e)	IOI Pelita & Stakeholders R		
						(-)	for Sejap Estate have been c	_	
16.	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned - 2022	Uncertified Unit	RSPO Stage 1 was conducted	will continue	to work with the RSPO Inves	closed the complaint case on 12 Octigate and Monitoring Unit on the stainable development. First and S	implementation

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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
					in September 2019.	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		n on Minimum Requirements for N Certification Systems for Principles	
						RSPO Roundtable on Sustainable Palm ↑ Complaints System ✓ Status Of C		
							ses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), ni Sawit Sejahtera (PT BSS), PT Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad)	
							Aidenvironment	(Complainant)
							COMPLAINT PROGRESS	
							COMPLAINT BACKGROUND	A
						Complaint Reference	N/A	
						Status	Case closed	
						Respondent	PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Saw Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad)	it Sejahtera (PT BSS), PT Sawit
						Complainant	Aldenvironment	



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
						RESPO Investigation & Monitoring Unit (IMU) Monitoring Peter Compliants Monitoring
						Post Complaints Monitoring TITLE CURRENT STATUS PT Subses Karyu Savet (SMS) PT Barket Naber Savet (PT BMS) PT Burni Savet Sephtrera (PT BSS) - Subsideday of PT Savet Nabers Agro (PT SMA) NO CARCOUP (s Subsideday of OI Corporation Berhad) - Case No. CAR-000882 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 be conducted in year 2021. The postponement of the main assessment have been communicated and approved by RSPO. In November 2020, PT. SKS internal audit 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."

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status		on on Minimum Requirements for N Certification Systems for Principle	
						Secretariat had finalize by IOI against the O	from RSPO that "the Investigation & Mo ed the internal review of the action plan Complaints Panel's directives and the e requirements set by the Complaints F	and progress reports submitted IMU concluded that IOI has
						Further and updated p	progress of this issue could be access the	nrough the link below;
						(a) RSPO Ketapang Co	omplaint for PT BSS, PT SKS & PT BNS	
							r – PT BSS, PT SKS & PT. BNS Status o	f Complaints
							Aidenvironment	(Complainant)
							COMPLAINT PROGRESS	
							COMPLAINT BACKGROUND	•
						Complaint Reference	N/A	
						Status	Case closed	
						Respondent	PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT Burni San Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad)	vit Sejahtera (PT BSS), PT Sawit
						Complainant	Aldenvironment	

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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
						(c) RSPO Post-Complaints Monitoring RESPO Resources Smallholder Engagement Platform Sustainability College RSPO Credits RSPO Credits ABOUT MEMBERSHIP CERTIFICATION SMALLHOLDERS PAG 2018 IMPACT WYRSPO ### RSPO / Investigation & Monitoring Unit (IMALI / Monitoring / Post-Complaints Monitoring Post Complaints Monitoring TITLE CURRENT STATUS
						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 auidit 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. 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

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status		on on Minimum Requirements for M Certification Systems for Principles	
							wit Sejahtera (PT BSS) - Subsidiary of Pary of IOI Corporation Berhad) - Case No	
						Secretariat had finalize by IOI against the C	from RSPO that "the Investigation & Mored the internal review of the action plan a Complaints Panel's directives and the e requirements set by the Complaints Pa	nd progress reports submitted IMU concluded that IOI has
						Further and updated p	progress of this issue could be access th	rough the link below;
						(a) RSPO Ketapang Co	omplaint for PT BSS, PT SKS & PT BNS	
						(b) RSPO Case Tracke	er – PT BSS, PT SKS & PT. BNS Status of	Complaints
						RSPO Roundtable on Sustainable Palm		Wave
							kses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), P ni Sawit Sejahtera (PT BSS), PT Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad)	T (Respondent)
							Aidenvironment	(Complainant)
							COMPLAINT PROGRESS	
								•
							COMPLAINT BACKGROUND	
						Complaint Reference	N/A	
						Status	Case closed	
						Respondent	PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad)	Sejahtera (PT BSS), PT Sawit
						Complainant	Aldenvironment	

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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
						(c) RSPO Post-Complaints Monitoring
						RSPO Resources Smallholder Engagement Flatform Sustainability College RSPO Codits Repair
						ABOUT MEMBERSHIP CERTIFICATION SMALLHOLDERS PEC 2018 IMPACT MYRSPO ### RSPO / Investigation & Monitoring Unit (MUI) / Monitoring / Past-Compliants Monitoring
						Post Complaints Monitoring
						TITLE CURRENT STATUS
						PT Suksas Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Burni Sawit Closed Sejahtera (PT BSS) - Subbladary of PT Sawit Nabati Agro (PT SNA), ICI CRCUP (a subbidiary of ICI Corporation Berhad) - Case No. CR-000882
						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 be conducted in year 2021. The postponement of the main assessment have been communicated and approved by RSPO. In November 2020, PT. BSS internal audit 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:



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 Resources Smallholder Engagement Flatform Sudamability Cultique BDO Cs
						ABOUT MEMBERSHIP CERTIFICATION SMALLHOLDERS PSC 2016 MPACT ### SSP0 / Certification / Name Planting Procedure / Public Consultances
						New Planting Procedure Public Consultations
						IOI Group - PT. Kalimantan Prima Agro Mandiri New Planting Procedures Public Consultations * 13 April 2018
						(O Group. PT. Kallmantan Prima Agro Mandirl has proposed new planting sea boarded in the Sukaramal Village, Kendinsvargan and Maris Mata Subdiction's, Ketagang Regency, West Kallmantan Province, Indonesia. This is the summary report of Ol Group. PT. Kallmantan Prima Agro Mandirl New Planting Assessment is now open for public comments for 30 days as required by the KSPO New Flanting Procedures (NPP). COMMENTS: NO.
						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 *no* Critical; 2 Minor nonconformities and *four(4)* Opportunity For Improvement raised. The *Ladang Sabah POM and Supply Base* 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 #	2158234-202201-N1	Date Issued	27/1/2022		
Due Date	Next surveillance	Date of nonconformity Closure	N/A		
Clause & Category (Critical / Minor)	7.3.1 Minor				
Statement of Nonconformity:	The waste management plan was not effectively implemented.				
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, disposal based on toxicity and hazardous characteristics, is documented implemented.				
Objective Evidence:	implemented. Environmental Impact Assessment – Management Action Plans & Continuous Improvement Plan for Mill and Estates for the year 2021 and 2022 was referred. During site visit at linesite area Laukin Estate, it was observed at recycle bin, there is no segregation of waste for Paper, Plastic, Aluminium and Glass as per their bin types. The training has been conducted on 11/02/2021. The effectiveness of the training could be further improved. It was not in line with 1.1 – Identification & Management Plan of Waste Products, 1.1.3, Domestic & Recyclable waste, sewage, and garden residue "Separation of plastics, glasses and papers". Ladang Sabah POM domestic waste disposed at Landfill Moynod Estate. During site visit at Landfill Area PM97D, it was noticed no segregation of waste (availability of recyclable waste disposed there). It was not in line with 1.1 – Identification & Management Plan of Waste Products, 1.2.6, Landfill "Separation of recyclable waste such as plastics, glasses, tins, iron and paper to be done". During site visit at SW Store Bimbingan 1 Estate, it was found that there is no evidence of labelling of SW stored there. It was not in line with 1.1 – Identification & Management Plan of Waste Products, 1.1.1, Schedule waste & empty chemical container plans "To properly store, label, monitoring and				
Corrections:	Laukin Estate & Ladang Sal	according to Environmental Q bah Palm Oil Mill:	daily ACL 1977.		



	Briefing and displaying interactive poster to all level of employees on the importance of waste segregation.	
	Bimbingan 1 Estate:	
	To complete the inventory record of SW prior transferring to the actual SW store which already has proper label that is required.	
Root Cause Analysis:	se Analysis: Laukin Estate & Ladang Sabah Palm Oil Mill:	
	1. Workers not having self-motivation to show the importance of segregating the waste.	
	2. No monitoring enforcement by management towards the waste being disposed to the landfill.	
	Bimbingan 1 Estate:	
	It was found that the SW item known as used PPE kept at the shower room area. However, during the recent housekeeping, the PIC yet to transfer them to actual SW store because the inventory process yet completed.	
Corrective Actions:	Laukin Estate & Ladang Sabah Palm Oil Mill:	
	1. Inspection on the waste segregation to be continuously conducted at all 3R bin station. In addition, the management to adopt and plan a recycle programme to promote the awareness.	
	2. The management to strengthen enforcement to monitor the waste segregation at linesite.	
	Bimbingan 1 Estate:	
	Refresher briefing by HSE Department to the estate management on the SW procedure to be conducted so that the inventory could be checked and housekeeping can be done without delay.	
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.	

Non-conformity				
NCR Ref #	2158234-202201-N2	Date Issued	27/1/2022	
Due Date	Next surveillance	Date of nonconformity Closure	N/A	
Clause & Category (Critical / Minor)	6.7.2 Minor			
Statement of Nonconformity:	Found the first aid equipment on site insufficient			
Requirement Reference:	understood by all workers. A	procedures are in place and Accident procedures are availal aysia) and explained in the	able in national languages	



	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.
Objective Evidence:	Based site visit at Laukin estate, it was found one unit first aid equipment (Eye Glow) has been used on 1/12/2021. As refer medical prescription storage condition (discard contain 4 week after opening) and during the verification audit on 24/1/2022 it was still been kept in the First aid box. On documentation verification in office, found that the inspection of First aid box was not conducted monthly basis as per first aid module training and not followed as per evaluation of compliance to legal requirement under appendix 1 dated 1/8/2012. The inspection record showed sampled on Jan 2022, 4 from 12 first aid box been done inspection and June 2021, the inspection only done for 1 first aid box out of 17 first aid box.
Corrections:	 To inspect all the first aid box and ensure no expired first aid box item. Reminder letter to be given to EHA, Staff and mandore on their negligence of duty to ensure the inspection of first aid kit in done on timely manner. HSE Department to conduct meeting with estate management including EHA and mandore on the mandatory requirement of first aid kit inspection.
Root Cause Analysis:	Expired eye glow was not monitored kept inside first aid box due to the negligence of mandore who did not send the first aid box for due inspection. Besides, inadequate enforcement and monitoring by the field staff to ensure the mandore following management instruction on the submission construed to the negligence.
Corrective Actions:	 Estate management to establish a delivery schedule on the first of box submission in stages for due inspection at clinic which to be observed by mandore respectively. Spot inspection to be conducted by HSE Department to verify on implementation/ practise.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Opportunity for Improvements				
OFI#	Description			
OFI 1	Indicator 1.1.5 The stakeholder list consist of 2 international NGOs – Business Social Responsibility and Finnwatch. These 2 NGOs are mainly engaged by Head Office. There are 2 opportunity for improvement: 1. As per Stakeholder Consultation procedure SPO/SDK/G/01 dated Dec 2020, it stated all stakeholders in the external list needs to be invited for annual stakeholder consultation. However this will not be happening for the 2 international NGOs as it is the responsibility of the Head Office. Hence the stakeholder list require improvement to enhance the responsibilities of the operating units. 2. Since these 2 NGOs are engaged by the Head Office, improvement on channeling the any results from the engagement with the operating unit can be improved.			
OFI 2	Indicator 3.4.2			



	The social management plan could be further improved on the propose actions to be taken, the timeline to address the proposed actions and the responsible person to ensure the actions are taken.
OFI 3	Indicator 4.2.2
	The Hotline state in the procedure could further improve by including the IOI Sabah hotline.
OFI 4	Indicator 3.3.1
	1. A procedure to improve the management of WEC including timeframe of each chairperson tenancy could be improved.
	2. A procedure to improve the management of ECC including timeframe of each chairperson tenancy could be improved.

Positive Findings		
PF#	Description	
PF 1	Good commitment and corporation from the management.	
PF 2	Well maintained labour quarters at the mill and all estates.	
PF 3	Positive feedbacks from internal and external stakeholders.	

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2023865-202102-N1	Date Issued	17/02/2021
Due Date	16/02/2022	Date of nonconformity Closure	27/01/2022
Clause & Category (Critical / Minor)	Indicator 6.7.4 Minor		
Statement of Nonconformity:		e of compliance on coverage law for 2 sample workers in L Estate.	
Requirement Reference:	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.		
Objective Evidence:	SOCSO contribution was ins Ladang Sabah Palm Oil Mill: Employee # 1SLS/IOI/0 & June 2020 Employee # 1SLS/IOI/0 & June 2020 Moynod Estate:	provision in accordance wi sufficiently evident for the wo 315/8987; Date joined 22/3/3 0317/8997; Date joined 6/3/2 013/7544; Date joined 1/10/3	rkers as following: 2015; for Month of March 2017; for Month of March



	Employee # 1SL 2020	.S/IOI/1115/7568	3; Date joined 1/1	1/2015; for Month of March
Corrections:	To declare t	he late/lapses of	contribution for t	he affected workers to SOCSO.
	To clear out all t	the late/lapses pa	syment of the con	tribution as advice by SOCSO.
Root Cause Analysis:	The lapses are due to the insufficient monitoring and verification of the SOCSO monthly payment process and its related data migration from the old check roll system to the new system.			
Corrective Actions:	To conduct all workers.	monthly monitori	ng and verificatio	n on the SOCSO contribution to
		any further lapse dance to the prod		found, payment will be carried
		ng regarding the workers for perso		anism on SOCSO registration &
Assessment Conclusion:	nonconformity b auditors deemed	ased on the root d to be appropria	cause determine	to be taken to address the d were being reviewed by lence of effectiveness of CAP ssment.
ASA 1_4 Verification	From the record of monthly record from chief clerk, no lapse was found as per verification. The coverage of insurance provision in accordance with Malaysia law through SOCSO contribution was insufficiently evident for the workers as following:			
	Bimbingan 1 est December	Workers ID	SOCSO (RM)	
	2021	1SPA27236	19.40	
		AU120034	30.60	
		C4647981	21.90	
		C3822749	29.40	
	Terusan Baru es		231.10	
	December	Workers ID	SOCSO (RM)	
	2021	C4644268	21.90	
		C3823010	21.90	
		C4644278	20.60	
		AS377085	21.90	
	Thus this minor	was close on 27	/1/2022 accordin	gly.

Non-conformity			
NCR Ref #	2036144-202103-M1	Date Issued	27/03/2021
Due Date	24/06/2021	Date of nonconformity Closure	16/06/2021



Clause & Category	Indicator 3.6.1	
(Critical / Minor)	Critical	
Statement of Nonconformity:	Implementation of mitigation plan for an identified H&S issues in estate operation was found not adequate.	
Requirement Reference:	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	
Objective Evidence:	Moynod Estate:	
	Sighted Sprayer workers in Moynod Estate was using general trailer (not passenger trailer) without safety precaution as per HIRARC recommendation (Reviewed dated 10/1/2021) from field to Office thus Major NC been raise during this Audit.	
Corrections:	1. To conduct immediate action for the maintenance of the passenger trailer by replacing punctured tyres with good one.	
	2. To issue reminder letter to the estate management for the delayed action on maintenance process of the passenger trailer.	
	3. To issue reminder letter to the workers who had failed to follow instruction by the Assistant Manager.	
	4. To issue reminder letter to the Field Supervisor in-charge for supervision failure.5. To conduct briefing and re-training with evaluation of the training to workers on the safety aspect when using the general trailer as transportation means as per SOP and HIRARC requirement.	
	To establish and to start conducting inspection on the condition of the passenger trailer as part of in the workplace inspection.	
Root Cause Analysis:	As normally practiced, the passenger trailer is being used for workers' transportation on daily basis. However, the passenger trailer was in breakdown due to punctured tyres since end February 2021. There was no immediate and further follow action taken to repair the passenger trailer by the estate management. It is noted that there is no inspection and monitoring for passenger trailer as part of the workplace inspection.	
	The Assistant Manager with the acknowledgement by the Estate Manager decided to use the general trailer as workers' transportation though they were aware with the SOP of Pemanduan Traktor and SOP Pengangkutan Pekerja (Umum) and HIRARC requirements. All workers were verbally briefed by the Assistant Manager on the needs to sit in the trailer floor as mentioned in the SOP requirement before the general trailer move. Regrettably, the verbal instructions were failed to be followed accordingly by workers.	
	In addition, supervision by the Field Supervisor in-charge of the workers was lacking to ensure that they adhered to the SOP.	
Corrective Actions:	To develop new HIRARC for workers' transportation using the general trailer in case of the passenger trailer breakdown.	
	2. Workplace inspection on the use of general trailer and passenger trailer to be conducted by the field supervisor on daily basis to ensure compliance of SOP and HIRARC.	
	3. To ensure vehicle inspection is conducted on daily basis. Any defects report is to be immediately communicated to the estate management for an immediate	



	action. Inspection is to be conducted by the workshop operator, field supervisor and Assistant Manager.
	 To regularly announce during muster on the needs to observe SOP & HIRARC requirements when using the general trailer and passenger trailer as transportation means.
	HSE Department is to conduct an internal audit and regular inspection to ensure all mitigation measures are implemented and complied.
Assessment Conclusion:	Evidence of corrections and corrective actions verified: - Punctured tyres replacement and relevant purchases record; Date: 5/6/2021
	 Reminder letters for the relevant personnel; Date: 14/4/2021 Refresher training on SOP & training evaluation record; Date: 15/4/2021 Vehicle inspection in particular the trailer; Date: March, April, May & June 2021 Briefing record on safety procedures for workers' transportation; Date: 26/3/2021, 8/4/2021, 18/5/2021 & 2/6/2021 Workplace inspection record; Date: March, April, May & June 2021 - Internal audit conducted by HSE Department; Date: 8/6/2021
	- HIRARC Form for Transporting of Workers Using General Trailer; Date: 5/4/2021
	Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 16/6/2021.
ASA 1_4 Verification	As per site verification in sampling estate and interview with workers not sighted any of workers using general trailer as passenger trailer. The workers also aware regarding this matter verified as per interview with spraying gang and manuring gang. Thus this major NC remained closed.

Non-conformity			
NCR Ref #	2036144-202103-N1	Date Issued	27/03/2021
Due Date	26/03/2022	Date of nonconformity Closure	27/01/2022
Clause & Category (Critical / Minor)	Indicator 7.11.3 Minor		
Statement of Nonconformity:	No evidence of the operating units' engagement on fire prevention and control measures with the adjacent stakeholders		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	Moynod Estate & Sg. Sapi E	state:	
	The estates visited eng- stakeholders' consultation n	agement with the adjace neeting.	nt stakeholders during
	In the meeting, the estate environmental and social iss	e brief the stakeholders on sue.	the IOI group policies,
		ice of the operating units' en sures with the adjacent stake	



Corrections:	The commitment from the new guidelines will be extracted and conversed to the adjacent stakeholders via other method of communication such as digital communication.
Root Cause Analysis:	The engagement on fire prevention and control measures with adjacent stakeholders is usually conducted once a year during the external stakeholder consultation and inclusive of inputs communication given following the Emergency Response Plan measure in which the new commitment as mentioned in the new guideline dated Jan 8th has yet being incorporated. Adding in, the guideline had just been newly distributed towards end February 2021 by IOI Sustainability HQ.
Corrective Actions:	Apart of having the communication digitally conversed, the commitment from the new guidelines will also be communicated during the annual stakeholder consultation and as when the needs arise.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
ASA 1_4 Verification	The corrective action of communicating the fire prevention guidelines was observed and conducted during the recent external stakeholder consultation. The stakeholder consultation of Laukin Estate, Bimbingan 1 Estate and Mill was verified and the consultation package consist the presentation deck that inform the process flow of making report. A contact list was also provided if it required to inform of any fire outbreak.
	The corrective actions taken are appropriate and deemed sufficient to close the non-conformance.

Non-conformity			
NCR Ref #	2036144-202103-N2	Date Issued	27/03/2021
Due Date	26/03/2022	Date of nonconformity Closure	27/01/2022
Clause & Category (Critical / Minor)	Indicator 4.2.3 Minor		
Statement of Nonconformity:	The unit of certification insufficiently keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is inadequately available 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:	Sg. Sapi Estate: During visit to Sg. Sapi and consultation with external stakeholders from school, the representative was asking on the status of the feedback given to the estate. Based on records of communication (Borang Maklumbalas; Lampiran 4) with information of grievances and complaints received from the school representative dated 28/1/2021 and records of time bound action plan for identified social aspects related to the feedbacks, it was found that there's insufficient evidence		



	that the grievance parties been informed of the grievance progress including against agreed timeframe and the outcome is not made available and communicated to the relevant stakeholders. Furthermore, some previous letters of requests received from external stakeholder and estate's response to the requests made was unable to be
	determined either the requester has received and/or acknowledge the response or not.
Corrections:	 The estate management to immediately attend to response on the school request by informing the current status of the school's request to them through the finalized TBAP.
	The estate management will arrange to get the written acknowledgement receipt from the stakeholders.
Root Cause Analysis:	- The request and response from the schools and other stakeholders during stakeholder consultation is recorded through a finalized Time Bound Action Plan (TBAP) document in which this record will be shared to the respective stakeholders after each consultation session ended however it is regretful that the TBAP document had just been finalized towards the audit day which cause the estate management to have missed to communicate on their stakeholder's current status request according to timeline.
	The response from the estate was only being noted through verbal telephonic call and no written records to support the receipt.
Corrective Actions:	- To include the stakeholder grievance mechanism in the annual stakeholder consultation programme. The request and Time Bound Action Plan record are to be communicated and acknowledged by stakeholders within the established and agreed time frame discussed during the consultation conducted.
	The estate management is to regularly conduct monitoring towards stakeholders' grievances, issues, and request using the grievances log/register mechanism.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
ASA 1_4 Verification	The Annual Review for SIA – Management action plans & Continuous Improvement plan of Laukin Estate prepared on 02/01/2022, Bimbingan Estate prepare in January 2022 and Mill prepared in January 2022 were reviewed and confirmed that grievances received from workers are incorporated in the management action plan. Example of grievance reviewed at Laukin Estate was the complaint against grocery item price made on 25/02/2021. The management plan on this grievance was recorded under "Sundry Shop" and improvement plans were identified. The action was taken and continuously monitored by the management. During the visit to Laukin Estate and Bimbingan 1 Estate sundry shop, the price list of items were transparency published. The corrective actions taken are appropriate and deemed sufficient to close the non-conformance.



Oppor	tunity for Improvement
OFI#	Description
OFI 1	OFI Statement: Finding Reference: 2023865-202102-I1 Clause: 6.2.6 The Gross Living Wage Calculation (GLWC) could be further specified for estates in Sabah Verification / Follow-up actions: There is currently no published Decent Living Wage by GLWC for Malaysia. However, the certified unit has calculated a living wage derived from the in-kind benefits provided to the workers. The calculation include housing basket, medical, education and transportation. The average living wage calculated for the certified unit is RM607.56. In lieu to no GLWC published decent living wage, the certified unit has
	continued to pay workers based on the national minimum wage of RM1,100 per month or RM42.13 per day. Thus OFI was close accordingly.

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1582202-201801-M1	Major	4.1.2	26/01/2018	Closed on 25/03/2018
1582202-201801-N1	Minor	5.3.3	26/01/2018	Closed on 25/01/2019
1728629-201901-M2	Major	4.1.1	25/01/2019	Closed on 20/04/2019
1728629-201901-N1	Minor	2.1.3	25/01/2019	Closed on 17/01/2020
RSPO P&C MYNI 2019				
1864944-202001-M1	Critical (Major)	2.1.1	17/01/2020	Closed on 15/4/2020
1864944-202001-M2	Critical (Major)	6.2.2	17/01/2020	Closed on 15/4/2020
1864944-202001-M3	Critical (Major)	6.2.3	17/01/2020	Closed on 15/4/2020
1864944-202001-M4	Critical (Major)	6.2.4	17/01/2020	Closed on 15/4/2020
1864944-202001-N1	Minor	1.1.5	17/01/2020	Closed on 17/2/2021
1864944-202001-N2	Minor	2.2.2	17/01/2020	Closed on 17/2/2021
1864944-202001-N3	Minor	2.2.3	17/01/2020	Closed on 17/2/2021
2023865-202102-N1	Minor	6.7.4	17/02/2021	Closed on 27/1/2022
2036144-202103-M1	Critical (Major)	3.6.1	27/3/2021	Closed on 16/6/2021
2036144-202103-N1	Minor	7.11.3	27/3/2021	Closed on 27/1/2022
2036144-202103-N2	Minor	4.2.3	27/3/2021	Closed on 27/1/2022



2158234-202201-N1	Minor	7.3.1	27/1/2022	Open
2158234-202201-N2	Minor	6.7.2	27/1/2022	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 *Ladang Sabah Oil Mill and supply base*. 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	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)			
Governmental Department	Sylvia Alsisto / Sabah Wildlife Department	By call			
Governmental Department	Awang Adzrul Ahmad / District Forestry Officer	By call			
Governmental Department	Ismail Harun / Director Department of Human Resource Sabah	By call			
NGO	Rosa Kusbiantoro / Business for Social Responsibility	By email (no response)			
NGO	Sonja Vartiala / Finnwatch	By email (no response)			
Communities	Humana School Teachers	Face to face interview			
Communities	Grocery Stores Owners	Face to face interview			
Internal	ECC Chairpersons	Face to face interview			
Internal	WEC Chairpersons	Face to face interview			
External	Beta Jubbe / adjacent land owner	By call			
External	Berkat Setia Sdn Bhd / adjacent land owner	Face to face interview			
External	Alfiq Enterprise / contractor	Face to face interview			
External	Syarikat Fazaly / contractor	Face to face interview			



Stakeho	olders comment
1	Feedbacks: Sylvia Asisto / Sabah Wildlife Department IOI Sabah has been very proactive and engaging in supporting and protecting the wildlife. A team was established to patrol the corridors to ensure wildlife are protected. Particularly, they are very active in elephant protection. The Sustainability Team has been always in engage with Sabah Wildlife Department.
	Audit Team verification and response: No further comments.
2	Feedbacks: Adzrul Ahmad / District Forestry Officer There have been no violation reported on IOI Sandakan region related to deforestation and encroachment.
	Audit Team verification and response: No further comments.
3	Feedbacks: Ismail Harun / Director Department of Human Resource Sabah There is no significant laws and regulation violation reported on IOI Sandakan. They have been actively ensuring their workers have the required work permits and documents. IOI has maintained and obliged to the Non-Sabah Citizen Employment License.
	Audit Team verification and response: No further comments.
4	Feedbacks: Humana School Teachers Especially in year 2021, many contributions were fulfilled – example school stationaries, teaching facilities and fencing. IOI has ensure that students are not entering the field. The estate management team has always emphasize to the teachers to continuously brief the students during morning assemble for not entering the field and attend schools.
	Audit Team verification and response: No further comments.
5	Feedbacks: Grocery Stores Owners / Alfiq Enterprise / Syarikat Fazaly The general response from contractors group is the working relationship with IOI has been fair. Contracts are entered transparently.
	Audit Team verification and response: No further comments.
6	Feedbacks: Beta Jubbe / Berkat Setia Sdn Bhd Discussion with adjacent land owner was focused on the land dispute and overall engagement over the last 12 months. The land demarcation has been maintained well and the land owners are aware on the engagement methods with the certified unit.
	Audit Team verification and response: No further comments.

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
Nil					
All estates land had undergone second cycle of replanting.					

Previous land owner / user comment	
	Feedbacks: Nil



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 Ladang Sabah 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 Ladang Sabah POM certification unit is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name:	Name:
Muhamad Naqiuddin Mazeli	R. Kumaresh
Company Name:	Company Náme:
BSI Services (M) Sdn Bhd	IOI Plantation Services Sdn Bhd
Title:	Title:
Lead Auditor	Senior Plantation Controller
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.) R. MARESH SR. PLANTATION CONTROLLER SANDARIN REGION
Date:18/2/2022	Date: 05/03/2022



Appendix A: Summary of Findings

Criterio	on / Indicator	Assessment Findings	Compliance
Princip	le 1: Behave ethically and transparently		
	on 1.1: The unit of certification provides adequate information to relevant iate languages and forms to allow for effective participation in decision mak		RSPO Criteria, in
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public Critical (Major) compliance -	Publicly available management documents such as land titles, OHS plans, EIA, SIA, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available and can be cross referred to their respective criterion. All operating units have individual documents and records to demonstrate compliance to this indicator. IOI Plantation documents are also accessible through their Group's website link: http://www.ioigroup.com	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders Minor compliance -	Information provided in English and Bahasa Melayu accessible to all stakeholders in IOI complex with translation on the information provided by the management to requested party mainly among foreign workers. More information publicly available can be access through web https://www.ioigroup.com/Content/S/S Define Sustainable Palm Oil Policy, Sustainable implementation update and others information were visible in the web.	Complied
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	Sampled of information request was reviewed at all sampled estates and mill. There were no such requests for information for the last 12 months.	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 -	The Stakeholder Consultation Procedure (SPO/SDK/G/01) rev 00 dated December 2020 documented process of consultation and communication with both external and internal stakeholders. The responsibilities person to implement this procedure is Social Liaison Officer.	Complied
		This procedure is being continuously informed and disclosed to the relevant stakeholders through external stakeholder engagement/meeting.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Each visited estate has maintained List of internal and external stakeholders. The external stakeholders includes governmental department (including schools and hospitals), NGOs, Embassy, Service Provider, supplier, contractor and others. While the internal stakeholders are mainly surrounding sister estates and mills.	OFI
		OFI: The stakeholder list consist of 2 international NGOs – Business Social Responsibility and Finnwatch. These 2 NGOs are mainly engaged by Head Office. There are 2 opportunity for improvement:	
		1. As per Stakeholder Consultation procedure SPO/SDK/G/01 dated Dec 2020, it stated all stakeholders in the external list needs to be invited for annual stakeholder consultation. However this will not be happening for the 2 international NGOs as it is the responsibility of the Head Office. Hence the stakeholder list require improvement to enhance the responsibilities of the operating units.	
		Since these 2 NGOs are engaged by the Head Office, improvement on chanelling the any results from the engagement with the operating unit can be improved.	
Criterio	n 1.2: The unit of certification commits to ethical conduct in all business op	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.	IOI Group has established the Code of Business Conduct & Ethics dated June 2020 and Business Ethics, Compliance, Anti-Corruption	Complied



	- Minor compliance -	and Anti-Money Laundering Policy dated September 2018 to guide the business operations and transactions. Specifically for recruitment, the Code of Conduct on Ethical Recruitment and Responsible Employment. Training and implementation records: 1. Policies briefing session at mill conducted on 12/01/2022. 2. Policies briefing session at mill conducted on 26/05/2021. 3. Policies briefing session at mill conducted on 14/10/2021. Policies briefing session at Bimbingan 1 estate conducted on 03/02/2021.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	 IOI Group has implemented 2 types internal audit to monitor the compliance and implementation of the group's polices and business practice. This includes RSPO P&C Internal Audit (conducted by Sustainability Team) and Corporate Internal Audit (conducted by Audit & Risk Management Committee). 1. The RSPO P&C internal audit records for mill conducted on 13/12/2021 was reviewed. 2. The Corporate Internal Audit records for mill conducted on 22/07/2021 was reviewed. 3. The Corporate Internal records Laukin estate year 2020 was reviewed. The RSPO P&C internal audit records for Bimbingan 1 estate conducted on 07/12/2021 was reviewed. 	Complied
Princip	le 2: Operate legally and respect rights		
Criterio	on 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 -	All relevant and applicable legal requirements had been identified by Ladang Sabah POM and its supply base. It incorporated the latest amendments, that is, OSH (Noise Exposure) Regulations	Complied

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2019, Minimum Wages Order 2020 and Prevention and Control of Infectious Diseases (Compounding of Offences) (Amendment) (No.6) Regulations 2020. At the assessed operating units, the following were noted to be complied.

Laukin estate

- 1. Air Compressor License; License Number: PMT-SB/2139924; License Valid till: 25/5/2022.
- 2. Energy Commission License (Private Installation); License Number: 2021/00128; Serial Number: 48003; License Validity Period: 18/01/2021 17/1/2022. The management already renew the license on 11/1/2022 as per verified the transaction details MYFX220111114674. The application can refer document ST(SSd)L/SBH/01038 dated application 1/12/2021.
- 3. MPOB License; License Number: 502981602000; License Period: 01/01/2022 till 31/12/2022.
- 4. Diesel License; License Reference Number: PPDNKK.SDK.43/1997 (SK). BL220180239320; for Diesel Capacity: 18,400 Litre; License Validity: 03/01/2021 02/01/2024.`
- 5.License for Menggaji Pekerja Bukan Pemastautin (JTK.H.SDK.600-4/1/1/01261/003857) valid from 28/1/2021 until 27/1/2022. This license for hired 90 Indonesia.

Ladang Sabah POM

CHRA conducted by DAB OH Sdn Bhd on 10/1/2022 refer report HQ/11/ASS/00/298 as additional to the previous CHRA report dated 17/7/2021.

From the CHRA recommendation, the chemical exposure monitoring need to be conduct to ensure the exposure of N-Hexane

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to lab operator was minimize. The management conducted the initial chemical exposure monitoring on 9/11/2021 ref no. HQ/18/JHI/00/00016-2021/033) and from the result showed below the permissible exposure limit for Hexane and welding fume: chromium.

Medical surveillance conducted yearly basis, record dated 20/9/20221 conducted by DAB OH Sdn Bhd. From the result all workers was fit to work as per verified.

Terusan baru Estate

MPOB license 502592602000 valid from 1/12/2021 until 30/11/2022. This license cover for 2504 Ha.

MPOB license for nursery 616358011000 valid from 1/4/2021 until 31/3/2022

PMT license SB PMT 80181 license valid until 29/3/2022

PMT license SB PMT 80296 license valid until 29/3/2022

JTK license on wages deduction valid from 13/4/2020 until 12/4/2022

License to hired from JTK referred JTK.H.SDK.600-4/1/1/001261/003859 valid until 21/10/2022. This license to hired 152 Indonesia and 10 Philippines

KPNDKK license (KPDNHEP.SDK.09/2002(SK))for Diesel (Euro 2m) for 20,000 liter valid until 8/12/2023

Bimbingan 1 Estate

MPOB license 503278702000 was valid until 31/12/2022

License from KPDNKK for Diesel (S003382) was available and valid until 16/12/2023



		PMT SB/20 38027 valid until 29/3/2022 License to hired from JTK referred JTK.H>SDK.600- 4/1/1/01261/003856 valid until 12/4/2022.	
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 -	Written information on legal requirements was documented and maintained in "Legal Requirements Register", dated 03/01/2022 prepared by SPO Department Sandakan Regional Office.	Complied
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 -	Legal or authorized boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorized boundaries as per sample for boundaries between IOI and Smallholder that are clearly demarcated and visibly maintained with blue color at Palm.	Complied
Criterio	Dn 2.2: All contractors providing operational services and supplying labour,	and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements	
2.2.1	A list of contracted parties is maintained Minor compliance -	List of all contracted parties were maintained in the operating units' stakeholder list. The latest list was updated in FY 2022. Among the stakeholders registered were government agencies, neighbouring estates, neighbouring villages, NGO, contractors, suppliers and service providers.	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 -	The requirements to comply with applicable laws are stipulated in the contract agreements. Among the applicable laws mentioned are: • Sabah Labour Ordinance • Passport Act • Anti-trafficking in Persons and Anti-Smuggling of Migrant Act • Immigration Act • SOCSO Act • Workmen Compensation Act	Complied

		 EPF Minimum Wage Order OSHA EQA Sampling on contractor agreement as per below:- Halizah Enterprise (Transportation Services), Agreement dated 1/7/2021 and valid until 30/6/2022. Syarikat E.M.S Bersaudara(excavator), agreement dated 1/7/2021 and valid until 30/6/2022. 	
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 -	The contract agreements for all the contractors contain clauses to disallow child, forced and trafficked labour which were written under subtitles "Sustainability Palm Oil Policy (SPOP)", "Sabah Labour Ordinance" and "Human Rights". These three subtitles made reference to IOI's SPOP and SLO.	Complied
Criterio	n 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 Critical (Major) compliance - 	Ladang Sabah POM is an RSPO Certified Identity Preserved Palm Oil Mill. The mill only receives certified RSPO FFB from estates within the Certification Unit and from FFB diverted from estates within IOI Plantation. The Group maintains the information on geo location of all the estates. All the estates have evidence of ownership to the land in the form of land titles. No claims are required as transactions are monitored at the HQ level since the FFB suppliers are under the same management. All estates supplying the FFB have valid MPOB license available for verification as sampled under indicator 2.1.1.	Complied

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.	Not applicable Group estates		eived only certified	FFB from own IOI	Not Applicable
	- Minor compliance -					
Princip	le 3: Optimise productivity, efficiency, positive impacts and resilie	nce				
Criterio	on 3.1: There is an implemented management plan that aims to achieve lor	ng-term econom	ic and financial	viability.		
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 -	supply base. planting, Rep Requirement, and Capital Ex	The estate bu lanting Progra Mature Oil Palm xpenditure Stat	siness plan covers mme, Executive/S n Costing Statemer	Tabah POM and its of Crop by Year of Staff and Workers of General Charges its interest accordingly.	Complied
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The replanting program projected for the next 10 years was available at the estates assessed. The annual replanting program sampled for 5 years as shown in table below:-			Complied	
	1-inor compilance	Year	Laukin	Bimbingan 1	Terusan baru	
		2022/23	244	344	194	
		2023/24	372	-	208	
		2024/25	166	-	-	
		2025/26	-	-	-	
		2026/27	-	-	-	
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 -	annual International below.	al SPO Audit at	each Operating Un	nce annually after it as shown in table	Complied
					iew conducted was ng been raised by	

		internal audit and already close the finding based on the management review and site verification.	
	n 3.2 : The unit of Certification regularly monitors and reviews their econor w demonstrable Continuous improvement in key operations.	mic, social and environmental performance and develops and implementations	ents action plans
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	The continuous improvement plans for all operating units for financial year 2021 and 2022 were available. Refer Environment Impact Assessment — Management Actins Plans & Continuous Improvement Plan dated January 2021 and January 2022. Among Main objectives discussed related environment were:	Complied
		 To ensure best management practices for environment aspects (waste management, IPM, Etc.) is continuously implemented and training given to all personnel. 	
		To identify the aspects and impacts of all environment related activities in mill and estates	
		To identify waste and to do responsible disposal	
		To ensure the enforcement of IOI Group's No Burning Policy	
		To ensure no use of Paraquat and pesticides that are categorized as World Health Organization Class IA or IB	
		To Identify source of GHG and calculation of GHG emission as well as plan and effort to minimize the emission.	
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].	From the verification on RSPO template, the data such as FFB and hectarage was accurate as per document verification on site. IOI Plantation maintains submitting its ACOP and RSPO GHG Calculations to the RSPO Secretariat.	Complied
	PROCEDURAL NOTE:		
	The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.		

Criterio	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 - - Management 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	mplemented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place Critical (Major) compliance -		OFI

		 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 OFI: The ECC and WEC procedure could be further improved to identify the timeframe of the chairperson tenancy. 	
3.3.2	A mechanism to check consistent implementation of procedures is in place Minor Compliance -	There is mechanism to check implementation of Standard Operating Procedure in Operation such as Internal audit, Agronomist, and Senior plantation controller. Internal audit procedure was based Sustainability Internal Audit dated 25/9/2017. One of the mechanisms to ensure the implementation was monitoring on activities record, sampling on tractor monitoring based on Safety on tractor driving accident under title competence and training (Doc ref: IOI-OSH 3.2.2 rev: 1 dated 1/8/2012). As per implementation record verified on Kubota 10 daily inspection for December 2021 by Amirullah.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Documented information such as records of monitoring, reports and completed checklists and any subsequent action required together with follow-up until closure of complaints and grievances, non-conformity/non-compliance were available and maintained. Sighted medical surveillance report, Supply Chain record, RTE	Complied



		animal sightings filled-up checklists, etc. whose record retention time varies complying to legal requirements. Sampling in each estate and mill as per below:-	
		Ladang Sabah POM	
		Audit & Risk Management Committee (LSPOM/RA/2021-22/07/01) dated 27/12/2021.	
		Mill Controller Visit by Mr N.Raymond on 26/10/2021.	
		<u>In Bimbingan 1 Estate</u>	
		Agronomist report to ensure fertiliser application been conducted accordingly, the report available dated 9/8/2021 and latest 7/1/2022. This report from Research Officer, IOI Research Centre Sabah.	
		Senior Plantation controller visit report dated 6/1/2022.	
	on 3.4: A comprehensive Social and Environmental Impact Assessment (SEI ment and monitoring plan is implemented and regularly updated in ongoing		environmental
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.	The Social Impact Assessment is conducted and reviewed annually by the estate Social Liaison Officer. Samples of review audited in this audit includes – Laukin Estate, last review of the SIA including management plan was on 02/01/2022; Bimbingan 1 Estate last	Complied
	- Critical (Major) compliance -	review of the SIA including management plan was in January 2022; Terusan Baru Estate last review of the SIA including management plan was in January 2022.; The format of the review is clearly defined which include participation methodology of external stakeholders.	
	- Critical (Major) compliance -	Terusan Baru Estate last review of the SIA including management plan was in January 2022.; The format of the review is clearly defined which include participation methodology of external	



documented in Environment Impact Assessment Management Action Plans & Continuous Improvement Plan. Latest review as below: Ladang Sabah POM: 18/01/2022 Laukin Estate: 18/01/2022 Bimbingan 1 Estate: 20/01/2022 Terusan Baru Estate: 21/01/2022 Among aspect identification for mill and estates as below: Mill Identification & Management Plan Of Waste Products, Identification & Management Plan Of Potential Pollution Source and Potential Source of GHG Emission Identification of side product / waste Identification of potential source of GHG emission and GHG reduction Plan. Water management Environmental Hazard and its management plan **Estates** Identification & Management Plan Of Waste Products, Identification & Management Plan Of Potential Pollution Source and Potential Source of GHG Emission Identification of fertilizer alternative Identification of side product / waste Identification of potential source of GHG emission and GHG reduction Plan. Identification of Integrated Pest Management Impacts from Replanting and its management plan

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		 Road construction Water management Environmental Hazard and its management plan 	
		Oil plam Nursery For replanting area, Ladang Sabah Group Estate has conducted the environmental impact assessment as per report Proposed Replanting of 16,688 Hectares of Oil Palm Plantations at Ladang Sabah Group Estate, District of Beluran, Sabah by IOI Corporation Bhd, with ref. no. JPAS/PP/02/600-1/11/1/117.	
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 -	The social management plan was developed with participation through external stakeholder consultation, Joint Consultative committee consultation, grievance records, women and empowerment committee and employee consultative committee. Samples of the SIA audited as per indicator 3.4.1 above. OFI: The social management plan could be further improved on the propose actions to be taken, the timeline to address the proposed actions and the responsible person to ensure the actions are taken.	OFI
		The mill and estates visited has established the social and environmental management plan based on the review of impact assessments conducted as Continuous Improvement Plan.	
		Environment Impact Assessment, Management Action Plans & Continuous Improvement has been reviewed as below:	
		Ladang Sabah POM: 18/01/2022	
		Laukin Estate: 18/01/2022	
		Bimbingan 1 Estate: 20/01/2022	
		Terusan Baru Estate: 21/01/2022	

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The management plan involved several topics as below: **Environment Impact Identification** Identification & Management Plan of waste product Schedule waste & Empty Chemical container Clinical waste Domestic & Recycle waste, sewage & garden residue Scrap Iron Identification and management plan of potential pollutant source Schedule waste store & empty chemical container store Clinical waste store Pesticide store & premixing area Workshop & vehicle bay Loading ramp Generator house Diesel skid tank Line site area Landfill Fertilizer store Lubricant store Etc Identification of side product

		Pruned oil palm fronds
		Identification of Potential source of GHG Emission and GHG Reduction Plan
		Fertilizer
		Diesel
		Electricity
		Chemical
		Generator set
		GHG Reduction monitoring plan
		Identification of Integrated pest management
		• Rats
		Bagworm
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 -	The Social Impact Assessment is conducted and reviewed annually by the estate Social Liaison Officer. Samples of review audited in this audit includes – Laukin Estate, last review of the SIA including management plan was on 02/01/2022; Bimbingan 1 Estate last review of the SIA including management plan was in January 2022; Terusan Baru Estate last review of the SIA including management plan was in January 2022. The review of the plans involved external stakeholder consultation, Joint Consultative committee consultation, grievance records, women and empowerment committee and employee consultative committee.
		Example of grievance raised by workers and was included in the management plan is grocery pricing. The plan is to monitor the



price of the grocery item and the price list of the Laukin Estate grocery store last reviewed was on 01/12/2021.

Management has monitored their action plan towards their action plans, monitoring and continuous improvement programme. Monitoring document and record has been reviewed as per stated in the EIA document. Sample of environmental management plan related environment as below.

Mill Environment Management Plan

- ESP gabion slope strengthening. To provide support to the pilings and retaining wall will be added at the bottom end of the slope.
- Septic tank cleaning and service. To do septic tank cleaning and desludging all the solid to designated area and to repair some of the piping which already chocked its flow with sand/mud.
- Recycle waste collection for staff quarters. To promote 3R program and to enhance the recycling program.

Estates Environment Management Plan

Nursery

- Ensure the boundary of nursery must have sufficient vegetation
- Ensure water pump and generator for pumping is not leaking lubricants

Emergency situation- Fire, Flood, Erosion

- Fire drill training conducted
- To install water level indicator at flood prone area during heavy rain
- Riparian reserved is left naturally to allow vegetation grow to reduce erosion.

		 IPM To do census, if the population is above threshold level, treat as per SOP Promote more on biological control on pest by planting more beneficial plan. 	
Criterio	on 3.5: A system for managing human resources is in place.		
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 -	The Foreign Workers Recruitment and Renewal SOP (IOI/SOP/HRD/20-144) dated 10/07/2020 and SOP for Workers on HR Matter (IOI/SOP/HRD/20-156) dated 12/08/2020 established the mechanism to employ foreign and local workers. The procedures provide clear flowcharts from recruitment, retirement until termination.	Complied
3.5.2	Employment procedures are implemented, and records are maintained Minor Compliance -	In the last 12 months there is no foreign labour employment in Laukin Estate due to restriction caused by COVID-19 Pandemic. However 1 record of local worker was reviewed. The employment flowchart of followed. In the last 12 months, there were no new workers employed in Bimbingan 1 Estate.	Complied
Criterio	on 3.6: An occupational health and safety (H&S) plan is documented, effect	ively 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 -	All operations in the mill and estates are risks assessed. The risks assessments are done in accordance with the legal requirements and management's commitments towards best practices. Sampling in Laukin estate base on accident happen in year 2021 as per below; Accident on 1/9/2021 as per JKKP 6 dated 4/9/2021. Accident during harvesting already been review the HIRARC on 4/9/2021.	Complied

		The record was available, and action already been taken as per verified on site. Chemical Health Risk Assessment Report conducted on 6/1/2022, this assessment conducted by DAB OH Sdn Bhd (Dosh registration: HQ/11/ASS/00/298-2022/263) The audiometric test in Laukin estate conducted on 11/1/2021, this assessment conducted by DAB OH Sdn Bhd. This involve 9 person and result showed was normal for all workers. The next audiometric test will conduct on Feb 2022.	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored Critical (Major) compliance -	The effectiveness of H&S plan to address health and safety risks was available in estate as per sampling below:- Ladang Sabah POM PTW (CS LSPOM: 0137) dated 9/4/2021 for CPO washing Plant- Hot water tank (confines space) was available. The AGT that involve (NW-NSDK-AGT-0019-P) valid until 11/4/2021. The AESP Musridin (NW-SBRO-AE-0350-S) valid until 24/2/2022 and Juhari (NW-SBRO-AE-R-1071-R) valid until 5/12/2021. The gas tester also been calibrated as per verification calibration report for Honeywell MAX XT II dated 15/1/2021. This calibration conducted by Sceptre Marketing (Referred Cert. No. SCM/21/014) Bimbingan 1 estate The management already establish the OSH plan dated 7/1/2022. This management plan was prepared by HSE manager and approved by estate manager. Verification on medical check up for workers involve in chemical handling and this medical checkup was done by estate HA. Sampling on spraying workers as per below:-AT707466 AU295059	Complied

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AU412939

C6554944

From the record verification, the record was available as per sampling sprayer workers. From the monthly (Latest was December 2021) medical check-up, EHA check for urine test, eye condition, pulse rate, lung, liver etc. the result showed fit to work with chemical.

In Terusan Baru estate

The Initial Noise Risk Assessment conducted on 6/11/2020 referred report DABOH/1120/070. As per report the recommendation need the employee that expose to high decibel such as Farm tractor driver, workshop operator, chainsaw operator, genset operator and etc need to attend to audiometric test. The latest record of audiometric test was on 11/1/2021 and from result sighted 2 person with abnormal audiogram. For retest the 2 person conducted on 30/4/2021.

Chemical Health Risk Assessment (CHRA) ref no; HQ/11/ASS/00/298-2022/266 dated 6/1/2022. This assessment conducted by Dr Mohd Azizan from DAB OH Sdn Bhd. From the assessment the recommendation for team sprayer, nursery, manurer, storekeeper and water treatment plant need to attend medical surveillance by OHD. From the record of medical surveillance, the latest management conduct the medical surveillance was on 11/1/2021. From the result showed that all employee was fit to work with chemical.

HIRARC review conducted yearly review by the management, latest record was on 15/1/2022. Sampling on carpenter (wood cutting).

Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers 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 RSPOP&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -	Formal training program for the year 2022 was established dated 4/1/2022 and made available at the beginning of each Financial Year and implemented accordingly. Training identification and needs analysis were applied to recognize the staff, workers and contractor's deficient skills or knowledge gaps, particularly, in aspects of RSPO P&C and the Supply Chain Certification System. There is no associated smallholders at this Certification Unit and thus no training given to them. Following the training given, regular assessment of training was conducted either by the Trainer or their immediate Supervisor to evaluate trainees' understanding. Else, refresher course will be organized. Training methodology given to workers are commonly On-The-Job Training, Coaching/Mentoring and Hands-on Practical Session with plenty of Graphical/Pictorial illustration than wordings as these approaches get their attention and better understanding.	Complied
3.7.2	Records of training are maintained Minor Compliance -	Training records were observed to be updated and maintained. In general, the identified trainings covered the aspects of safety, environment, best practices and social. Sampled a few of the following training records at the respective assessed operating units, given in 2020 and 2021. Training record in Mill;- • Confined space training conducted on 9/1/2021 by competent person (Ikhwan Fadly). • Covid 19 sample Test SOP Briefing conducted on 13/1/2021 by HOD Ladang Sabah. • Working At High Procedure for Contractor conducted on 19/1/2021 by Mr Ikhwan and Shendy Gordon.	Complied



- Briefing for IOI Policies conducted by Maslina Ambotang on 13/2/2021.
- Fire Fighting training conducted on 24/2/2021 by firefighting team.
- Emergency and First aid training on 16/1/2021 conducted by ERT team.
- Training on hearing conservation was conducted on 18/5/2021 attended by 27 person.

Training record in Bimbingan 1 Estate:-

- Fire extinguisher training and emergency cases dated 9/1/2021. Trained by Mr Saiful Sopain.
- Training on SOP Spraying and PPE application dated 9/3/2021 by Mr Saiful and Mr Irex.
- Hearing conservation training by Santy Syairah dated 14/4/2021.
- IPM training by Mr Robert dated 20/5/2021.
- USECHH Regulation training by Mr Ikhwan dated 21/5/2021.
- Sexual harassment training by Pn Celestina Maka dated 10/1/2021.

Training record in Terusan Baru estate:-

- SOP on nursery training dated 20/1/2021
- Grievances training dated 22/4/2021
- First aid training dated 26/2/2021
- ERP training dated 20/4/2021

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.	 Manuring training dated 18/5/2021 Weighbridge training 29/4/2021 There were three trainings conducted related to RSPO SC since the last assessment, i.e.: RSPO, MSPO and SCCS briefing by Mdm. Veronica Abel dated 19/1/2022 to critical control point including 	Complied
	- Minor Compliance -	transporter with total 10 person attended. ii) Supply Chain training conducted by Mdm. Veronica Abel on 4/8/2021, attended by 31 person.	
	on 3.8: Supply chain requirement for mills Ill supply chain requirements are considered as Critical (C). However it will	not contribute to suspension if there is more than 5 non-compliance w	ithin 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.	The mill received and processed only certified FFB from own company group estates. A procedure, RSPO Supply Chain – Identity Preserve (IP) [doc. No.: RSPOSC/SOP/IP/3, rev. 8, dated 31/10/2020] was developed to implement the IP supply chain system at the POM. The procedure is applicable for incoming FFB, outgoing CPO & PK at RSPO certified mills that operate IP supply chain system. The procedure has also covered the subjects of overproduction, handling of complaints and non-conformities product.	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	Ladang Sabah POM deemed to be Identity Preserved (IP) since the FFB processed mill are sourced from own company group estates that are certified against the RSPO Principles and Criteria (RSPO P&C).	Not Applicable

	claim only 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 represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The mill met all registration and reporting requirements for the IP module through the RSPO IT platform. Registered information from PalmTrace shown the following: - Member Name: Ladang Sabah Sdn Bhd - Ladang Sabah Palm Oil Mil - PalmTrace Member ID: RSPO_PO1000000541 - RSPO Membership Number: 2-0002-04-000-00 -License ID: CB122202 -Start date: 24/7/2021 until 2/4/2022	Complied
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. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and	IOI Group has developed procedures to implement the elements of the applicable supply chain model as below: • RSPO Supply Chain – Identity Preserve (IP) [doc. No.: RSPOSC/SOP/IP/3, rev. 8, dated 31/10/2020] • Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018. The Mill Manager has an overall responsibility and authority over the implementation of the procedure, requirements and compliances with all the applicable RSPO Supply Chain Certification Standard and assisted by Assistant Managers, Engineers and Technical Executives as per stated in its procedure.	Complied

	 compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	FFB were obtained from all IOI's certified estates only. There was no third party's crop nor non-certified FFB received by the mill.	
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. 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. 	IOI Group has developed Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018 for conducting RSPO SCCS and RSPO Rules on Market Communications and Claims internal audit. Latest internal audit was conducted on 13/12/2021 by the SPO Department Sandakan Region. The coverage of internal audit has included the General Chain of Custody Requirements for the Supply Chain and Module D: Identity Preserved. There are 1 non-conformity raised on SCCS from the internal audit. And already close with conduct the SCCS training to transporter on 19/1/2022.	Complied
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. 	The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number. There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement.	Complied

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The mechanism for handling non-conforming oil palm products and/or documents is addressed under RSPOSC/SOP/IP/3 Clause 12 which describes the non-certified material or product shall be kept segregated from the certified ones.

Sampling on weighbridge ticket incoming FFB as per below:-

Linbar 1 estate

Wb ticket: FB21013075 RSPO cert: rspo 543161

Dated: 1/9/2021 Weight: 11060kg

Sakilan estate

Wb ticket: FB21001860 RSPO cert: rspo 543161

Dated: 5/2/2021 Weight: 11050kg

Bimbingan 1 estate Wb ticket: FB21011199 RSPO cert: rspo 687135 Dated: 31/7/2021

Weight: 10700kg

Laukin estate

Wb ticket: FB21011212 RSPO cert: rspo 687135

	Dated: 31/7/2021 Weight: 19800kg	
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.	below:- CPO The name and address of the buyer; IOI Edible Oils Sdn Bhd The name and address of the seller; IOI Commodity Trading Sdn Bhd The loading or shipment / delivery date; 11/5/2021 The date on which the documents were issued; 11/5/2021 RSPO certificate number; RSPO 687135 A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); CSPO/IP	Complied

		RSPO certificate number; RSPO 687135	
		A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); CSPK/IP	
		The quantity of the products delivered; 31730 kg	
		Any related transport documentation; CSPK contract (Ref C20583/2110)	
		A unique identification number: Weighbridge ticket; PK21000282/ Transaction no: TR-03eacc9c-2480	
3.8.9	Outsourcing Activities i) The mill shall not outsource its milling activities. In cases where he	The mill have updated procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPOSC/SOP/IP/3 Rev: 08 dated 31/10/2020.	Complied
	mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification	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;-	
	ii) The mill shall ensure the following:	CPO transporter (Pengangkutan Ya Hen Sdn Bhd)	
	a) The mill has legal ownership of all input material to be included in outsourced processes	Agreement between Ladang Sabah Sdn Bhd with Pengangkutan Ya Hen Sdn Bhd was valid from 1/8/2019 until 31/7/2022. The transporter already sign the Transport Policy dated 1/8/2019 stated	
	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.	that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. Palm Kernel transporter(Juita Baru Sdn Bhd)	
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	 c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 	Agreement between Ladang Sabah Sdn Bhd with JUita Baru Snd Bhd was valid from 1/8/2019 until 31/7/2022. The transporter already sign the Transport Policy dated 1/8/2019 stated that	
	d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide	certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.	



3.8.10	relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The mill have a record of all contact detail for transporter and updated. The record was stated under stakeholder list dated Jan 2022.	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.	No changes of transporter and the mill aware on requirement to inform CB in advance in case of new outsource contractor appointed.	Complied
3.8.12	 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 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. 	Ladang Sabah 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 D – CPO Mills: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 2 years' period. Sampled records of FFB weighbridge tickets and daily production records for last 2 years were still in place for verification. 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].	Complied

	c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.		
3.8.13	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 available in Table 10 of full public summary report.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	As per mill monthly production records, the record was updated and available for reviewed.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	The mill have updated procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPOSC/SOP/IP/3 Rev: 08 dated 31/10/2020. From the record verification no outsider FFB accepted in Ladang Sabah POM. The FFB source only from supply base as per RSPO Ladang Sabah certificate.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly.	Complied

3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use verified as per interview and document review such as sustainability report etc. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has obtained Trademark License from RSPO. The trademark license# is 2-0002-04-100-03 which is valid from 25/1/2022 to 24/1/2024.	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 Group 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. 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.	IOI Group 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
4.3	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 Group 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



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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 Group 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	ess 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.	Not Applicable
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.	Not Applicable
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: 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.	Not applicable as Ladang Sabah POM is neither distributors nor wholesalers.	Not Applicable



	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
Busine	ess to consumer communication		
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Ladang Sabah POM does not made any product specific claim.	Complied
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be	There was no use of RSPO Trademark logo used on product claim.	Complied

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undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES		
Certified oil palm content (IP)		
95% or above of the oil palm content must be RSPO MB-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 Ladang Sabah POM.	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)		<u> </u>
Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified	As to date, no RSPO trademark used by the facility.	Complied



Messaging (IP) Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: • 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.		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.		
may include some or all of the following elements: • 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 RSPOcertified 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,	Messag	ing (IP)		
Principle 4: Respect community and human rights and deliver benefits		may include some or all of the following elements: • 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 RSPOcertified 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.	,	Not Applicable

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Criterio	n 4.1: The unit of Certification respects human rights, which includes respect	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 Sustainability Oil Palm Policy dated October 2020 documented the commitment towards protecting human rights defenders against threats and retaliation in accordance to the Universal Declaration of Human Rights.	Complied
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Interview with workers, external stakeholders including the Department of Human Resource Sabah, surrounding communities confirmed that they have not received any reports or heard of any violence used by the management in operating the business.	Complied
Criterio	n 4.2: There is a mutually agreed and documented system for dealing with	complaints and grievances, which is implemented and accepted by all	affected parties
4.2.1	(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 -	The certified unit has continued maintaining the existing Grievance Procedure and the latest Whistle-Blower mechanism has enhanced the anonymity of complainant. The grievance mechanisms are implemented through continuous briefing during muster and continuous awareness to publishing the information at notices board located at muster ground, office vicinity and housing vicinity. Significant repeated grievance that requires long term management are embedded into the Social management plan. As per the Sustainable Oil Palm Policy dated October 2020, the certified unit is committed to protect human rights defender.	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 -	The certified unit has continued maintaining the existing Grievance Procedure and the latest Whistle-Blower mechanism has enhanced the anonymity of complainant.	OFI

		The procedures are continuously briefed to the workers during muster call and the procedures are made available on notice boards and places where is easily seen by workers e.g. grocery stores. OFI: The Hotline state in the procedure could further improve by including the IOI Sabah hotline.	
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 -	The grievance book were reviewed. Over the last 12 months most of the grievance are more like request for house fix and requesting use of company assets. These "grievance" are attended and acknowledge by requester / complainant. There are few significant grievances which are managed under the social management plan as they are long term and required continuously monitoring.	Complied
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 -	As per the Grievance Procedure (IOI/P/GP/001) rev 1 dated 20/01/2020 stated that "if required during the process, IOI and the complainant can agree to involve a neutral third party facilitator, mediator or specific social, environmental expert, particularly where issues are complex or multiple groups are involved"	Complied
Criterio	on 4.3: The unit of Certification contributes to local sustainable developmen	t 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 -	IOI Sabah has made contributions to community development especially in providing education through joining Humana program and encourage Community Learning Centre (CLC). Results of stakeholder consultation with Humana teachers has further enhance contribution only school stationaries.	Complied
		In 2022, IOI Sabah region has started a new program to provide free lunch for the Humana and CLC students.	
		Other kind of contributions are usually based on request such as borrowing company assets and contributions in a form of donations.	

Criterio	on 4.4: Use of the land for oil palm does not diminish the legal, customary o	As a Group, IOI has contributed to other community development in year 2021. The contributions focuses on health care. Other information can be found in the IOI website. (https://www.ioigroup.com/Content/CI/Corp Responsibilities). or user rights of other users without their free, prior and informed cor	nsent.
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance -	Below land titles were reconfirmed during this audit: 1. Laukin Estate, the previous audited land ownership remains valid. The land was developed since Yayasan Sabah (Sabah Foundation) and fully transferred to Safima Plantations Sdn Bhd (holding company for Laukin Estate) on 10/09/1994. Prior to that, the land was first sub-lease by Sabah Foundation to Safima Plantations Sdn Bhd on 06/12/1986. As per the land title (Title No. 085317942), the 2,128ha land is not customary land. As the estate has been long developed, FPIC process is no more applicable for Laukin Estate. Terusan Baru Estate, the previous audited land ownership remains valid. There are 4 parcel of lands under this operating unit. Title number — 095310946, 095310937, 096290103 and 085322710. These lands were transferred from another companies and lands were developed as agriculture land prior finally taken over by Mayvin Incorporated Sdn Bhd (a subsidiary of IOI whom is the holding company of Terusan Baru estate) or direct transfer from Sabah State Government. As the estate has been long developed, FPIC process is no more applicable for Terusan Baru Estate.	Complied
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	All of the estates within the certified unit have been long developed prior to RSPO and lands are directly leased with the Sabah State Government. While there is no new development, the FPIC is not applicable.	Not Applicable



4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	All of the estates within the certified unit have been long developed prior to RSPO and lands are directly leased with the Sabah State Government. While there is no new development, the FPIC is not applicable.	Not Applicable
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	All of the estates within the certified unit have been long developed prior to RSPO and lands are directly leased with the Sabah State Government. While there is no new development, the FPIC is not applicable.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	All of the estates within the certified unit have been long developed prior to RSPO and lands are directly leased with the Sabah State Government. While there is no new development, the FPIC is not applicable.	Not Applicable
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 -	All of the estates within the certified unit have been long developed prior to RSPO and lands are directly leased with the Sabah State Government. While there is no new development, the FPIC is not applicable.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	All of the estates within the certified unit have been long developed prior to RSPO and lands are directly leased with the Sabah State Government. While there is no new development, the FPIC is not applicable.	Not Applicable

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 -	All of the estates within the certified unit have been long developed prior to RSPO and lands are directly leased with the Sabah State Government. While there is no new development, the FPIC is not applicable.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	All of the estates within the certified unit have been long developed prior to RSPO and lands are directly leased with the Sabah State Government. While there is no new development, the FPIC is not applicable.	Not Applicable
	on 4.5: No new plantings are established on local peoples' land where it calealt 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 -	As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	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 -	As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and	As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However	Not Applicable

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	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 -	through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	
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 -	As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	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 -	As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	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 -	As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	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	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no	Not Applicable

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	under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	
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. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given.	Not Applicable
		In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	
	on 4.6: Any negotiations Concerning compensation for loss of legal, customa, local communities and other stakeholders to express their views through the		ables 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 -	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given.	Complied
		In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	
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 -	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given.	Complied

		In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	
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 new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given.	Not Applicable
		In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	
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 new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given.	Not Applicable
		In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	
	on 4.7: Where it can be demonstrated that local peoples have legal, cushment of rights, subject to their FPIC and negotiated agreements.	tomary or user rights, they are compensated for any agreed land	acquisitions and
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	Complied

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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 -	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the	Complied
		Grievance Procedure for Land Owner dated March 2019.	
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. - Minor compliance -	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given.	Complied
		In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019.	
Criterio			
rights.	on 4.8: The right to use the land is demonstrated and is not legitimately con	ntested by local people who can demonstrate that they have legal, cu	stomary, or user
	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 -	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given.	Not Applicable
rights.	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.	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing	

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	involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the Grievance Procedure for Land Owner dated March 2019. Interview conducted with surrounding population and land owners has not recorded any land conflict.	
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 -	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given.	Not Applicable
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 -	There is no new land acquisition. As per estates land titles verified (as per indicator 4.4.1), lands occupied by the certified unit are government leased land. While there is no new planting, FPIC is no more applicable. However through interviewing surrounding populations and communities user rights especially on sharing roads are still given. In any circumstances of land dispute, it will be managed using the	Not Applicable
Principl	e 5: Support smallholder inclusion	Grievance Procedure for Land Owner dated March 2019.	
-	n 5.1: The unit of certification deals fairly and transparently with all smallh	olders (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 -	The prices paid for FFB was publicly available at weighbridge area and updated by weekly. There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was not applicable.	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 -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was not applicable.	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 -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was not applicable.	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 -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe Minor compliance -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was 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 Critical (Major) compliance -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was not applicable.	Not Applicable
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	The weighbridge equipment was latest verified by Metrology Corporation Malaysia Sdn. Bhd. Latest calibration was verified as below for weighbridge as below: - Weighbridge Date Safety Sticker Serial no	Complied



F:						
		A	07/01/2021	DE18004089	1503429	
		В	23/01/2021	19K056945	16215024	
		С	06/05/2021	2IKQ013500	1510045	
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 -	POM. Ladang Sa	abah POM is rec	eive FFB only fro	to Ladang Sabah m its own supply this indicator was	Not Applicable
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 -	POM. Ladang Sa	abah POM is rec	eive FFB only fro	to Ladang Sabah m its own supply this indicator was	Not Applicable
Criterio	on 5.2: The unit of certification supports improved livelihoods of smallholde	rs and their inclus	ion in sustainabl	e palm oil value o	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 -	POM. Ladang Sa	abah POM is rec	eive FFB only fro	to Ladang Sabah m its own supply this indicator was	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). - Minor compliance -	POM. Ladang Sa	abah POM is rec	eive FFB only fro	to Ladang Sabah m its own supply this indicator was	Not Applicable



5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling Critical (Major) compliance -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases. Ladang Sabah POM was an IP mill. Thus, this indicator was not applicable.	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 -	The IOI Sustainability Oil Palm Policy dated October 2020 documented the overall group's commitment towards equal opportunities for all employees, regardless of race, nationality, religion or gender. A prevailing Equal Opportunity Employment & Freedom of Association Policies dated October 2017 details IOI's commitment.	Complied
		The implementation of the group's policies include briefing/sharing during stakeholder consultation, internal training/morning briefing and publish on notice boards (Sustainability Corner).	
		Interview with workers and selected external stakeholders are able to confirm that the policies are made know to them.	

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 -	Interview with workers have not observed any sort of discrimination. Especially on the recruitment fees, levy fee, work pass renewal are all managed by the certified unit. Workers are not required to pay any form of cost related to recruitment and renewal of work pass. Workers salary slips (a total of 60 samples were selected) for the month of September – November 2021 was reviewed. Selection include different gender, nationality, work stations and work type. The review of the slips demonstrated equal amount of overtime offerings, no unethical/bias deduction and all relevant contribution are given to the workers.	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 -	The Foreign Workers Recruitment and Renewal SOP (IOI/SOP/HRD/20-144) dated 10/07/2020 and SOP for Workers on HR Matter (IOI/SOP/HRD/20-156) dated 12/08/2020 established the mechanism to employ foreign and local workers. The procedures provide clear flowcharts from recruitment, retirement until termination. Review of the 60 workers files sampled during this audit demonstrated that medical fitness is one to the elements for job selection. However this is not considered as discrimination as it is important to know if the worker is fit for the job. The registration cards of the workers does not specifically state any illness. The cards only state "Fit for work".	Complied
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 -	Pregnancy test records were verified at Bimbingan 1 Estate. The tests were conducted with consent and it is confirmed during female workers interview. The tests were conducted especially for female whom are handling chemical includes pesticide and fertilizer to ensure early detection and rearrangement of work task can be done as soon as possible. As stated in 6.1.2 above there is no discrimination observed.	Complied



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 -	IOI established the Women & Empowerment Committee (WEC) to address issues concerning to the minority gender. During the interview with the Mill WEC chairperson, programs such as harassment awareness and social activities to enhance hominization.	Complied
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	Workers salary slips (a total of 60 samples were selected) for the month of September – November 2021 was reviewed. Selection include different gender, nationality, work stations and work type. The review of the slips demonstrated equal amount of overtime offerings, no unethical/bias deduction and all relevant contribution are given to the workers.	Complied
	on 6.2: Pay and conditions for staff and workers and for contract workers a iving 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 -	The employment contract is drafted according to the Sabah Labor Ordinance Cap.67. Both local and foreign employment adopt the same contract. As Sabah State has not recognised the Malaysian National Union for Plantation Workers, no collective agreements is in place. IOI has implemented Employee Consultative Committee. The mill's ECC Chairperson understood that he has the power to negotiate on the terms of employment. However this was not practice so far. At the estates, the piece rate pricing are published on notice board. Sample of workers' employment contract were reviewed to confirm contracts are in Bahasa Malaysia. Bahasa Malaysia language is deemed appropriate and sufficient as generally the workers of the certified units are either local, Indonesian or Southern Filipino whom understand Bahasa Malaysia. Furthermore, as stated in the employment contract, it is the responsibility of the company to explain the terms of employment and the company regulations before the workers signs the	Complied

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		contracts. In general, the workers understood the basic employment terms.	
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. - Critical (Major) compliance -	A sample of 60 workers was reviewed. Selection include different gender, nationality, work stations and work type. Contracts are available and addendum of some original contracts were made due to the revision of minimum wage. The contracts have include the minimum requirement include holiday entitlement, salary, deductions, work hours, termination and resignation and reference to the Sabah Labour Ordinance.	Complied
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 -	A total of 60 workers salary slips samples for the month of September – November 2021 were reviewed. Selection include different gender, nationality, work stations and work type. The review of the slips demonstrated equal amount of overtime offerings, no unethical/bias deduction and all relevant contribution are given to the workers.	Complied
		The deduction allowed by the Sabah Human Resource dated 25/08/2020 includes – deduction for dependent's travel document, deduction for dependent's passport, deduction for club house, deduction for recreation centre, deduction for buffalo, deduction for electricity payment, deduction for dependent medical cost and others including telephone bill, petrol, grocery stores and religious matters. However this approval is a cover approval for the whole IOI Sandakan Region operations. The deductions may not be applicable to all workers.	
		Review on the salary slips does not show unjustified deductions. The deductions are mainly for religious matters, medical for dependents and travel documents for dependents.	
		Review of the slips did not show overly overtime and any overtime are paid accordingly. It was observed that FFBs are counted as	

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		double if the harvesting was done during rest days while any work on rest day or work after the usual 8 hours (for those whom are employed as daily wage earners) are paid accordingly. Review of the slips also show that sick leaves and public holidays are paid accordingly.	
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.	Workers are provided with housing with toilets, electricity and clean water. In general, each worker will have 1 house to accommodate them and their family. A visit to the housing compound could not identify over crowded housing. Each worker are provided with sufficient space. The certified unit conducted periodic house census. The records of Bimbingan 1 estate and Laukin estate was reviewed.	Complied
	- Critical (Major) compliance -	The review of the estates' budget shows continual allocation to maintain the housing facilities and replace old quarters. Example at Terusan Baru estate, for FY2020/2021 a total of RM414,600 was allocated for new quarters construction and RM337,094 was allocated for housing and compound upkeep.	
		Other basic amenities available to workers includes – sport facilities, praying facilities, crèches, grocery shops, clinics and schools.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	In all the sample estates, grocery shops are available. Basic food item such as rice, eggs, salt, sugar, noodles, can food, fresh meat are available. Other more luxury items and basic needs such as soap and shampoo are also available. Interview with store owners confirmed that upon worker request, they will assist workers to purchase other unavailable item such as electrical appliances.	Complied
		In controlling the basic necessity item, the certified unit has implemented monthly monitoring of item prices. Stores owners are aware that they are not allow to raise the prices without	



		justifications. On a general price structure, the price of the items are about 30% of the wholesale price.	
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: 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, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).	There is currently no published Decent Living Wage by GLWC for Malaysia. However, the certified unit has calculated a living wage derived from the in-kind benefits provided to the workers. The calculation include housing basket, medical, education and transportation. The average living wage calculated for the certified unit is RM607.56. In lieu to no GLWC published decent living wage, the certified unit has continued to pay workers based on the national minimum wage of RM1,100 per month or RM42.13 per day.	Complied
	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. 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		
	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 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.	The employment list were verified. There is no casual or temporary workers are employed for core works. However, the FFB transportation from the estates to the mill are sub-contracted to	Complied
	- Minor compliance -	local transporter. Interview with the contractors confirmed that they have no hired any workers and is all by self-employment.	
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 employersonnel.		
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 IOI Sustainability Oil Palm Policy dated October 2020 documented the overall commitment towards upholding the right to freedom of association and recognized the right to collective bargaining and allow trade union to have access to workers. The group policy is complemented with Equal Opportunity Employment and Freedom of Association Policies dated October 2017.	Complied



		The implementation of the policy are though continuous daily briefing, publication on notice boards and explained to workers during inductions. Interview with workers confirmed that they are aware on the company's policies and procedures. As there is no plantation trade union in Sabah, the certified unit has recognized the workers' rights to form consultative committees.	
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 -	Ladang Sabah complex is located in Sabah, Malaysia and there is no registered trade union. Therefore, the certified unit is implementing Employee Consultative Committee (ECC). The ECC is engaging with the management through Joint Consultative Committee (JCC) meeting. The last JCC meeting for mill was conducted on 07/12/2021.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Each operating unit has it ones ECC and each ECC is chair by ECC Chairperson voted by the workers. The formation of the ECC president is by workers' nomination. This was confirmed during interview with the ECC presidents.	Complied
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 Sustainability Oil Palm Policy dated October 2020 documented the overall commitment towards protecting child labor which extended to contractors, agents and sub-agents. The service contracts of the FFB transporter were reviewed and the terms of service stated of prohibition of child labor. Furthermore, the contractors whom are the stakeholder of the certified unit has	Complied
		also been continuously made aware on the polices related to child labour. Interview conducted with the contractors confirm their knowledge of such.	

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 -	Workers files sampled during this audit did not find any child or young labors were employed. As per the recruitment procedure the age verification is done through checking the Malaysian Identity card or passport.	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 -	Reference to the operating units master list, there is no young person employed. This information was cross-checked with Humana teachers. As per the interview outcome, the estate managers has always emphasize Humana teachers to embed the knowledge of not entering the field to the children. The Humana teachers on a continually brief this to the students during morning assembly. Field observation did not detect any young or child labor.	Complied
		Additionally, the certified unit has recently start religious school for children whom have not started Humana school. This initiative is to further eliminate any possible chances of parents bringing their children to field.	
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 no child labour policy is communicate through several channels including external stakeholder consultation, morning briefing, periodic training, employment induction training and publication of the company policies on Sustainability Corner made available at housing complex and office vicinity. The certified unit does not received outside FFB crops. However the information is still being share to the surrounding communities related to importance of no child labor in their respective works.	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.	The IOI Sustainability Oil Palm Policy dated October 2020 documented the overall commitment towards promoting safe and healthy work place that is free from sexual harassment and other	Complied

	- Critical (Major) compliance -	hazards. The commitment is complemented with Guidelines for Handling Harassment at Workplace (IOI/G/SE/004) rev 02 dated 26/11/2020.	
		The implementation of the policy are though continuous daily briefing, publication on notice boards and explained to workers during inductions.	
		Interview with female workers confirmed that they are aware on the company's policies and procedures. Cross-checked with Health Assistances and Securities officers further confirmed that there were no reports of sexual harassment at the sampled estates.	
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. - Critical (Major) compliance -	The IOI Sustainability Oil Palm Policy dated October 2020 documented the overall commitment towards protecting reproductive health of women employees and promote women empowerment. The commitment is complemented with Guidelines on Reproductive Health (IOI/G/SE/002) rev 02 dated 05/10/2020.	Complied
		The implementation of the policy are though continuous daily briefing, publication on notice boards and explained to workers during inductions. Interview with female workers confirmed that they are aware on the company's policies and procedures.	
		Records of pregnant workers are available and the new mother needs are assessed. This shows that the certified unit is protecting reproductive rights.	
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 -	The new mothers needs were assessed usually by the WEC and sometimes the HA depending on the operating unit setup. Since December 2021, an improved assessment method was implemented with standardized form and questions. Up-to-date, there new mothers needs are usually requesting flexible working time to allow them to nurse the baby and to provide transport for baby screening/vaccination.	Complied

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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 -	Interview was conducted with mill Women and Empowerment Committee (WEC). No complaints related to sexual harassment was recorded over the last 12 months. The chairlady of the mill's WEC informed that shall there is any complaint related to sexual harassment, workers can raise it either through the WEC or the Whistle-blower hotline.	Complied
		Interview with female workers confirmed that they are aware on the company's policies and procedures. Cross-checked with Health Assistances and Securities officers further confirmed that there were no reports of sexual harassment at the sampled estates.	
Criterio	on 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 for 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 - 	As stated in indicator 6.2.1 and 6.2.2 above, sampled of 60 workers shows that employment are voluntary. Interviewed with workers confirmed that they are not forced into the employment. The passports of the workers and their dependents are kept by themselves. Review of the salary payments and payslip did not identify any holding of wages. Over the last 12 months, there were no new employment of foreign labors at the sampled estates. Interview with workers did not show any evidence that they are forced to work and required to pay bondage if they want to return to the home country for holiday. As per the work agreement, workers are free to resign the employment with notice period without having paying termination penalty.	Complied
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 -	Policy and commitment of IOI towards the foreign workers is documented in the Sustainable Oil Palm Policy dated October 2020 and complimented by the Foreign Workers Recruitment and Renewal SOP (IOI/SOP/HRD/20-144) dated 10/07/2020.	Complied

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		IOI Group has implemented additional controls in foreign workers hiring. Previously workers employments are 100% managed by estates. Since March 2020, a full system modification was made whereby the estates only make request and application for new foreign workers. The IOI Sandakan Region HR team will review and approve the employment if it meets the Group's policy and recruitment procedure.	
Criterio	on 6.7: The unit of certification ensures that the working environment unde	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 -	The respective Operating Units have appointed their Assistant Manager as the person in charge for safety and environment. The PIC role covers areas of responsibilities on safety, health and welfare of the staff/workers. The Mill and Estates Managers in turn were appointed as the Chairman for the OSH committee. His duties among others was to preside the OSH meetings, discharge the General Duties of Employers and make decision arising out of issues discussed for improvement of Safety, Health, Welfare and the Environment. OSH Committee has been formed consisting of representatives from the management and workers. Workplace inspection in Mill conducted quarterly base, this inspection covered all workstation including biogas area. The latest inspection was on December 2021 before OSH meeting (11/12/2021). For OSH meeting conducted 3 monthly bases, the latest OSH meeting is 11/12/2021. Bimbingan 1 estate Appointment letter for OSH Secretary was available dated 29/5/2020 to Mr Saiful Sopain. This letter valid until 29/5/2022. a. OSH meeting conducted 3 monthly basis, latest record meeting in Bimbingan 1 estate was on 12/11/2021. This meeting involve	Complied

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		pertaining to safet and 28/5/2021.	onducted on 29/7/2021				
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed. - Minor compliance -	The Certification Unit contained in their Investigation & Repor Preparedness and summarized in a flow mill and estates emp Operating Unit ERP contact numbers have members receive train Accident record was a per below: JKKP 8/106072/2021 accident happen in mid MC. For JKKP 6 record available.	Non- compliance				
		Date incident	Name	MC			
		1/4/2021	Sylvester Janeh	18 day			
		18/10/2021	Saparudin bin Nahdini	59 day			
		month after opening. I on 1/12/2021. On documentation	on verification in off	kept for more than 1 ne eye more been used fice, found that the acted monthly basis as			



		of comp 1/8/2012 box beer done for been rais					
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.	practices including use of PPE related to their job function. Sampling in Bimbingan 1 estate for P&D sprayer: Training conducted on 14/7/2021 in house training conducted by					Complied
	- Critical (Major) compliance -	Item	1SPA/101/ 0718/4264	1SPA/101/ 0121/27236	1SPA/101/ 0917/4370	1SPA/101/ 0912/4178	
		Respirator	5/11/2021				
		Ear plug			11/8/2021	11/8/2021	
		Nitrile glove	26/8/2021				
		PVC boot	30/4/2021	21/7/2021			
		Filter	5/11/2021	28/7/2021			
		Safety Helmet			11/8/2021	11/8/2021	
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 -					Complied	



		December	Work	kers ID	SOCSO (R	M)	
		2021	1SPA	A27236	19.40		
			AU12	20034	30.60		
			C464	47981	21.90		
			C382	22749	29.40		
		Terusan Baru e	estate				
		December	Work	kers ID	SOCSO (R	M)	
		2021	C464	14268	21.90		
			C382	23010	21.90		
			C464	14278	20.60		
			AS37	77085	21.90		
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	The occurrence shown below:	e of accid	dents reco	rded for YTD	December 2020 is as	Complied
	- Minor compliance -	Operating uni	it	LTI		Cases	
		Laukin estate		82.60		10	
		Ladang Sabah	n POM	48.13		2	
		Terusan Baru	estate	76.14		20	

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

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	The estates continue to implement biological control pest in the plantation such as leaf eating pest an others. IPM techniques applied at the estates include pest numbers and the use of triggers for initiation of measures. Census records show that there was mirror of leaf eating pests, beneficial plants are being establis natural predators and further reduce the outbreak. Rat Census The management already conduct rat census on mor result latest was 1.23% (Pest damaged now) and old 0.92% Records show that the estates have planted benefice.			at and rats among clude monitoring of control minimal outbreak nimal outbreaks of ablished to attract ak. monthly basis and ad old damage was	Complied	
		as 60% of Cass of Antigonon lep	ia cobanensis , 2 otopus. Sampling imbingan 1 esta	20% of Turnera g implementation	subulata and 20% of IPM plan as per c 2021. The actual Cassia Cobanensis	
		20A	28.5	94.5	- Cobarierisis	
		96A	37.50	107	109	
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 -	•			org. This is not es were referenced	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 -	No evidence and record showed using fire for pest control in all estate. Ladang Sabah production unit has committed to Zero Burning compliance as spelt out in the Environmental Policy.	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 -	Justification of pesticides applied is available in the Agricultural Policies, Section 6.0: Weeding – Weed Control and Section 9.0: Pest and Disease. The use of pesticide is specific to the targeted pest, weed and disease. Justification takes consideration to minimize effect on non-target species. Chemicals allowed use in estate is available dated 28/2/2021. It include Glyphosate, Metsulfuron methyl, Triclopyr, Fluoxypyr 1 –methyl, Brodifacoum, Propineb, cypermetrin and Diuron. 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. The use of other Class 1 Chemicals (such as metamidophos and monocrotophos) approved by the Pesticides Board and included in the MPOB list of approved Pesticide for use in oil palm plantations can only be carried out under strict supervision and in absolutely necessary circumstances such as severe outbreak and critical pest infestation, and, with special method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.	Complied
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.	Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The table	Complied



	- Critical (Major) compliance -	below shows refinancial years.	cords of weedicid	de /pesticide use	for the last two	
		Glyphosate	Bimbingan 1 estate	Terusan Baru Estate		
		2021	1.101	0.766		
		2020	1.11	1.78		
		Triclopyr Butoxy ethyl	Bimbingan 1 estate	Terusan Baru Estate		
		2021	0.228	0.0		
		2020	0.179	0.169		
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 -	minimize the u establishing biolo in the field is co	ial plant progran	s. The manager per IPM plan. The IOI Group SOP.	ment encourage	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -				he estates visited h for all estates	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:	Malaysian Pestic Sighting of the estates showed	ides Act 1974 (Ad	ct 149) and Regu ster dated 01/01 I, III & IV chem	./2021 at these icals were used.	Complied

	 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 - 	was eliminated totally. In its place, alternatives such as Glyphosate were used instead. As per Chemical register in Bimbingan 1 estate dated 31/2/2021, no chemical under class 1A or 1B or that listed by the Stockholm or Rotterdam Conventions, and paraquat	
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 -	Pesticides were handled, used or applied by trained workers in accordance with the product label. In addition to the product label, Safety Data Sheets were used and explained to the participants with emphasis on PPE, health and environmental risks of pesticide exposure; recognition of acute and long-term exposure; ways to minimize exposure to workers and their families; and international and national instruments or regulations that protect workers' health. Training for pesticides handler are as shown in the table below: Bimbingan 1 Estate Training on SOP Spraying and PPE application dated 9/3/2021 by Mr Saiful and Mr Irex. IPM training by Mr Robert dated 20/5/2021. USECHH Regulation training by Mr Ikhwan dated 21/5/2021. Terusan Baru Estate Training on spraying P&D dated 9/2/2021 Training on application chemical in nursery dated 5/4/2021 Selective spraying dated 29/7/2021	Complied



7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -	At estates assessed the storage of pesticides was in accordance with the Occupational Safety and Health Act 1994 (Act 514), Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OSH CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were made available at the chemical store and explained to the workers by Management.	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 -	Empty pesticides containers were triple rinsed and be reused as premix chemical container or being puncture and stored at designated store before being disposed at collection centre located at Ladang Sabah POM.	Complied
		Approval by DOE has been gained for "Requesting Permission To Gather Scheduled Waste At One Common Collection Centre At Each Group" dated 23/01/2018.	
		Reference letter ASSH9B)91/110/619/001 Jld 22(85). Refer section 2.2 refer collection centre Ladang Sabah POM (Other SW) and Klinik Luangmanis for SW404.	
		Empty pesticide containers were categorized as SW409 according to their SOP. The disposal was made through Licence contractor Lagenda Bumimas Sdn Bhd.	
		Inventory record for reuse as premix container were available at the estate and collection record for All pesticide containers that are triple rinsed and punctured were available as Ladang Sabah POM Schedule Waste record.	
		Latest incoming consignment by Moynod Estate dated 18/12/2021 amounted 0.28 MT and Mill dated 15/12/2021 amounted 0.04 MT.	
		Latest Disposal was made for SW409 dated 27/11/2021 amounted 1.28 MT.	

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 -	There was no aerial spraying noted in all estates assessed.	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 -	Following the CHRA conducted at each Operating Unit Annual medical surveillance has been carried out for all pesticide operators at the said estates as recommended by the CHRA Assessor. Medical surveillance record of those operators was examined and	Complied
		all of them were certified fit with no detrimental to health by registered Occupational Health Doctor, HQ/19/DOC/00/00399 from DAB OH Sdn Bhd. See table below date of test, number and category of employees examined and their test findings.	
		Medical surveillance conducted yearly basis, latest conducted on 11/1/2021 and 11/3/2021 at DAB OH Sdn Bhd. Total involve in this medical surveillance was 12 person and result was fit to work.	
		In Bimbingan 1 estate, conducted the medical surveillance for 14 person workers including store attendant, genset operator, workshop and sprayer. This surveillance conducted on 19/5/2021 at DAB OH Sdn Bhd. From the result showed all was fit to work with chemical.	
		Sighted in Terusan baru estate, conducted the medical surveillance for 51 person workers including store attendant, genset operator, workshop and sprayer. This surveillance conducted on 11/1/2021 (46 person) and 11/3/2021(5 person) at DAB OH Sdn Bhd. From the result showed all was fit to work with chemical.	



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 -	Pregnant and breast-feeding women, under-age person and other people that have medical restrictions working with pesticides are strictly prohibited to work with pesticides. Noted, there were women working as sprayers. Verified that the female workers were checked for pregnancy test at three-month interval by the on-site Estate Hospital Assistant. All results showed negative findings. Also, verified master list of workers and interview with management and workers found no record of workers under the of 18 in all 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.	Wastes management plan is documented and incorporated with internal Environmental Impact Assessment. Among the wastes identified are:	Non- compliance
	- Minor compliance -	1. Scheduled wastes & empty chemical containers	
		2. Clinical wastes	
		3. Domestic & recyclable wastes, sewage, and garden residue	
		4. Scrap iron	
		The waste management plan was not effectively implemented.	
		Environmental Impact Assessment – Management Action Plans & Continuous Improvement Plan for Mill and Estates for the year 2021 and 2022 was referred.	
		During site visit at line site area Laukin Estate, it was observed at recycle bin, there is no segregation of waste for Paper, Plastic, Aluminium and Glass as per their bin types. The training has been conducted on 11/02/2021. The effectiveness of the training could be further improved. It was not in line with 1.1 - Identification & Management Plan of Waste Products, 1.1.3, Domestic & Recyclable waste, sewage, and garden residue "Separation of plastics, glasses and papers".	

		Ladang Sabah POM domestic waste was disposed at Landfill	
		Moynod Estate. During site visit at Landfill Area PM 97 D, it was noticed no segregation of waste (availability of recyclable waste disposed there). It was not in line with 1.1 - Identification & Management Plan of Waste Products, 1.2.6, Landfill "Separation of recyclable waste such as plastics, glasses, tins, iron and paper to be done".	
		During site visit at SW Store Bimbingan 1 Estate, it was found that there is no evidence of labelling of SW stored there. It was not in line with 1.1 - Identification & Management Plan of Waste Products, 1.1.1, Schedule waste & empty chemical container plans "To properly store, label, monitoring and dispose of schedule waste according to Environmental Quality Act 1974. Thus minor NC been raised during this audit.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Procedure of Schedule Waste Management has been established, Refer Schedule waste Management Systems, Schedule waste Guidelines dated 01/01/2015. Reference number IOI/SRO/HSE/SW/01.	Complied
		For Ladang Sabah Sdn Bhd certification unit, the estates were sent their SW waste at collection centre which is Ladang Sabah POM. Approval by DOE has been gained for "Requesting Permission To Gather Scheduled Waste At One Common Collection Centre At Each Group" dated 23/01/2018.	
		Reference letter ASSH9B)91/110/619/001 Jld 22(85). Refer section 2.2 refer collection centre Ladang Sabah POM (Other SW) and Klinik Luangmanis for SW404.	
		Estates and Mill has monitored their inventory and disposal of schedule waste as per Fifth Schedule (Regulation 11) Environmental Quality ACT 1974, Environmental Quality (Scheduled waste) Regulation 2005.	

	Inventory by Mill and estates has been verified. Sample of Despatch of scheduled waste by estate and Mill:	
	· ·	
	Ladang Sabah POM	
	<u>Inventory</u>	
	File reference Number: ASSH/SDK(B)31/152/000/033	
	• Date Reporting: 30/12/2021	
	• Waste Generated: SW102, SW104, SW109, SW110, SW305, SW306, SW409, SW410, SW417, SW429	
	<u>Disposal</u>	
	Sample 1	
	Disposal consignment note: 2021121516DGOBVW	
	• Date Disposal: 15/12/2021	
	SW409: Used Fertilizer Bag 0.34 MT by Lagenda Bumimas Sdn Bhd (Pengangkutan BT)	
	Sample 2	
	Disposal consignment note: 2021121517ANXSEO	
	Date Disposal: 15/12/2021	
	SW429: Discarded Chemical MT by Lagenda Bumimas Sdn Bhd (Pengangkutan BT)	
	Sample 3	
	Disposal consignment note: 20211215MVE0PJ	
	• Date Disposal: 15/12/2021	
	SW109: Used Lighting Bulbs 0.07 MT by Lagenda Bumimas Sdn Bhd (Pengangkutan BT)	
	Sample 4	
	Disposal consignment note: 2021121516DEB8P6	
•	· · · · · · · · · · · · · · · · · · ·	



• Date Disposal: 15/12/2021

 SW409: Empty Chemical Containers 1.28 MT by Lagenda Bumimas Sdn Bhd (Pengangkutan BT)

<u>Inventory for SW at estates.</u>

Laukin Estate

Sample 1

Date: 17/09/2021

SW: SW417=0.003MT, SW409=0.024MT

Destination: Ladang Sabah POM

Bimbingan 1 Estate

Sample 1

Date: 04/12/2021

SW: SW305=0.020MT, SW410=0.012MT

Destination: Ladang Sabah POM

Terusan Baru Estate

Sample 1

Date: 15/09/2021

SW: SW409=0.160MT, SW305=0.200MT

Destination: Ladang Sabah POM

Awareness Training for related waste management has been conducted. Verified training record, attendance, and photo

evidence. Sample of training as below:

Ladang Sabah POM

- Schedule waste training dated 18/12/2021
- 3R training dated 08/05/2021

Laukin Estate

		 Schedule waste training dated 26/02/2021 Waste segregation training dated 11/02/2021 Bimbingan 1 Estate Scheduled waste training dated 16/03/2021 			
7.3.3	Safe Work training on Waste Management dated 13/12/2021 Disposal for domestic and non-hazardous waste is through landfilling at designated area within estate. Segregation of non-degradable and degradable waste was done at site and dumping of waste only allowed for degradable waste. Mill domestic waste was managed by estate. Collection of domestic waste has been conducted 3 times a week.				Complied
		Estate / Mill	Block No	Date Open/Closed	
		Ladang Sabah POM	PM97D	20/01/2022	
		Laukin Estate	PM95B	03/01/2022	
		Bimbingan 1 Estate	PM97M	22/12/2022	
		Terusan Baru Estate	PM94B	01/01/2022	
Criterio	n 7.4: Practices maintain soil fertility at, or where possible improve soil fert	tility to, a level that ensure	es optimal and susta	ined 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 -	IOI group has establishe manage soil fertility. The the StOP as follows:-			Complied
		 Leguminous Cover IOI/SOP/A/08 Manual fertilizer App document ref. no. IOI/Somethins 	olication for immatu		

		2 Whoolbarrow fortilizor application for immature and mature	
		3. Wheelbarrow fertilizer application for immature and mature palm, document ref. no. IOI/SOP/A/10	
		4. Buffalo assisted Manuring for immature and mature palm,	
		document ref. no. IOI/SOP/A/11	
		5. Semi mechanized manuring for mature palm, document ref. no. IOI/SOP/A/12	
		6. Empty fruit bunch (EFB) Mulching, document ref. no. IOI/SOP/A/13	
		7. Palm Oil Mill Effluent (POME) Application, document ref. no. IOI/SOP/A/14	
		8. Fertilizer Sampling for Analysis, document ref. no. IOI/SOP/A/15 9. Planning and Organization of fertilizer application, document ref. no. IOI/SOP/A/16	
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 -	IOI group has established Standard Operation Procedure (StOP) for foliar and soil sampling. The StOP was revised in March 2020. Among the StOP as follows:	Complied
		Foliar Sampling and Soil Sampling	
		1. Foliar Analysis document ref. no. IOI/SOP/A/41	
		2. Soil Analysis document ref. no. IOI/SOP/A/42	
		In the StOP stated that both foliar sampling and soil sampling to be	
		conducted annually.	
		In Bimbingan 1 estate, Agronomist also conduct leaf and soil	
		sampling to ensure the soil fertility and plant health. Latest recommendation was on 7/1/2022 and previously was on 9/8/2021. This recommendation provided by the Research Officer from IOI	
		Research Centre Sabah. From the recommendation 9/8/2021 as per below:-	

		Fertilizer NPK Mix	Recommended For young palm	Composition (% Nutrient) (10.6/4.4/19.6)	
		CPD	Immature and replanting	(10/5/18.3/2.4/0.5)	
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. - Minor compliance -	the Boiler Station and Estate where it is used soil. The Mill also distrused as a mulch as a waste. EFB is applied at rate Agronomist. The appli	I also distributed to the distributed to the distributes its Decanter Coal method to recycle of 30 mt/ha as per relications of mulching a	M is used as biofuel at he Ladang Sabah POM d to further fertilize the take to the estate to be the generated organic ecommendation by the are being monitored by a records for year 2021	Complied
		Month	EFB, MT	Decanter Cake, Mt	
		Jan – Dec 2021	17684.24	1932.25	
7.4.4	Records of fertiliser inputs are maintained Minor compliance -	recommendation by t	the Agronomist. The ecords in Daily Cost Bo follows:	r StOP established and estate maintained the ook. Reviewed fertiliser	Complied
			3 bag of CPD dated	13/12 and 14/12/2021 dation.	
		In field 17G using 18 23/11/2021.	33 bag of NK Mix da	ated 20/11, 22/11 and	



Criteri	7.5: Practices minimise and control erosion and degradation of soils.				
7.5.1		Soil maps and So account in plan an plays a major rule agronomical operamaps, all the soil no recognized may within the area of Among soil series	Complied		
		Estate	Type of Soil, series	Percentage, %	
		Laukin	Rumidi	87%	
			Kertam	13%	
		Bimbingan 1	Lokan	100%	
		Terusan Baru	Sook	2%	
			Rumidi	86%	
			Bidu Bidu	12%	
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 -	There is no repla observed that pridegradation of soil 1. Proper stacking 2. EFB applicating 3. Avoidance of 4. Construction Road maintenance interlines.	Complied		



7.5.3	There is no new planting of oil palm on steep terrain Minor compliance -	Verified through site visit and document verification, there is no planting of oil palm on steep terrain. Previously area with steep terrain has been abounded.	Complied
Criterio operatio	on 7.6: Soil surveys and topographic information are used for site planning ons.	in the establishment of new plantings, and the results are incorporated	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 -	Referring to Indicator 7.5.1 above where soil series and terrain were analysed, the long-term suitability of land for oil palm cultivation had been taken into account in plans and operations. Guided by IOI Group Standard Operating Procedures (StOPs) for estate Operations Master List dated September 2007 and Agricultural Manual, planting density, land clearing and preparation, leguminous cover plant, manuring, weeding, pest and disease, no planting on steep terrain and others were followed to optimise land usage.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There is no planting on marginal and fragile soil. Guided by IOI Group Standard Operating Procedures (StOPs) for estate Operations Master List dated September 2007.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure Minor compliance -	Soil survey and Topography Map was verified. The planning on drainage and irrigation system, roads and other infrastructure Guided by IOI Group Standard Operating Procedures (StOPs) for estate Operations Master List dated September 2007.	Complied
Criterio	on 7.7: No new planting on peat, regardless of depth after 15 November 20	18 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 -	There is no new planting reported and seen during site visit. Additionally, based on the soil map and observation during the site visit, there was no peat soil.	Complied



7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	Not Applicable as there is no peat soil within the sampled estates	Complied
	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 -		
7.7.3	(C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -	Not Applicable as there is no peat soil within the sampled estates	Complied
7.7.4	(C) A documented water and ground cover management programme is in place.	Not Applicable as there is no peat soil within the sampled estates	Complied
	- Critical (Major) compliance -		
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 crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.	No peat soil in sampling estate as per verification thus not applicable for this management unit.	Not Applicable
	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 -		



7.7.6	(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 -	No peat soil in sampling estate as per verification thus not applicable for this management unit.	Not Applicable
7.7.7	(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 associated audit guidance. - Critical (Major) compliance -	No peat soil in sampling estate as per verification thus not applicable for this management unit.	Not Applicable
Criterio	n 7.8: Practices maintain the quality and availability of surface and ground	water.	
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. - Minor compliance -	Sustainability Department has established water management plan and reviewed on annually basis. Latest reviewed was conducted on January 2022. The objectives of the plan were to conserve and to maintain the availability of surface and ground water through pollution prevention. It outlined the method to conserve and minimise pollution of water through implementation of various methods such as best practice of raw water & effluent treatment, maintaining riparian zone, management of land irrigation, maintaining soft vegetation in the field, regular education to employees on conserving water and water pollution preventions. The operating units visited provide the workers with adequate clean water through treated water at water treatment plant. Drinking water analysis was conducted twice per year. Based on site visit and interview, it was verified that workers have access to clean water and management provide clean water without any charge.	Complied



Among details in the Water Management Plan for Mill and Estates as below: -
Mill Water management
Monitoring of the sump house area to ensure no prohibited activity such as spraying
Clearing of tall grass were done manually free from chemical
Monitoring of water pump daily
Monitoring of water usage flow meter to determine both domestic and mill processing
Surface Water Quality Index (WQI) to be analysed monthly
To send drinking water quality to a 3 rd Party Laboratory for monitoring.
Estates Water Management
Water Treatment Plant
Monitor the pump engine daily for any breakdown. Regular checks on any pipes leaks are carried out.
Vegetation along the water catchment is left growth naturally. No EFB dumping or spraying operation allowed at the area
Water chlorination plant has been constructed to threat the water supply before consumption.
Water extraction from the river water.
To maintain monitor the riparian reserve and the demarcation along the river.
To give awareness regarding to riparian reserve training to the workers especially for the sprayer and manurer
Installation of water flow meter to monitor water distribution of treated water



Drinking water quality analysis

- A program of drinking water quality analysis test has been introduced and established
- Management unit / ELO (Environmental Licenced Officer) to ensure the water samples to be test based on the schedule programme.

Stream water quality analysis

- To maintain monitor the riparian reserve and the demarcation along the river
- To give awareness regarding to riparian reserve training to the workers especially for the sprayer and manurer

Water quality monitoring has been conducted. Refer Certificate of analysis as below: -

Laukin Estate

Sample: Sample Pipeline water B

Date sample: 24/08/2021 Date report: 14/09/2021 Report No.: W210824/02

Laboratory: DYNAKEY Laboratories Sdn Bhd

Result: Showed parameters do not exceed as per NWQSM

guidelines.

Bimbingan 1 Estate
Sample: River Water
Date sample: 13/04/2021
Date report: 21/04/2021
Report No.: EL/W/0421/149

Laboratory: Enfirst Laboratories Sdn Bhd

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Result: Showed parameters do not exceed as per NWQSM

guidelines.

Terusan Baru Estate

Sample: Labour Quarters Tank
Date sample: 20/08/2021
Date report: 08/09/2021
Report No.: W210820/06

Laboratory: DYNAKEY Laboratories Sdn Bhd

Result: Showed parameters do not exceed as per NWQSM guidelines unless Coliform count, cfu/100ml showed 5 over parameter 1. Management has put in the Water management plan Section 8 "Management will conduct cleaning of tank and re-test of water to see if the quality improved". The retest of water sampling has been sent to the lab as reference letter DL/MSG/2022/22 dated 27/01/2021.

Ladang Sabah POM

Sample: Hulu Sg Muanad, Hilir Sg Muanad, Final Discharge X Point.

Date sample: 27/12/2021 Date report: 06/01/2022 Report No.: E211227/08A-08C

Laboratory: DYNAKEY Laboratories Sdn Bhd

Result: Showed parameters do not exceed as per NWQSM

guidelines.

Sample: Raw Water
Date sample: 09/09/2021
Date report: 23/09/2021
Report No.: W210909/04A

		Laboratory: DYNAKEY Laboratorie Result: Showed parameters do guidelines.		
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 environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.	Water courses and wetlands are and restoring appropriate riparia zones have been identified and fertilizer application observed beet Verified through site visit found at the conservation area. Based reserve in Sabah found all estates	Complied		
	- Critical (Major) compliance -	River width (m)	Riparian reserve (m)	
		>40	50	
	20-40	40		
		3-20	20	
		<3	5	
		Verified the monitoring report by Consultant) for compliance of Replanting of 16,688 Hectares Oil Group Estates, District of Be 1/11/1/17).	Palm Plantation at Ladang Sabah	
		1. Report Y1/2021 dated 08/04/	2021	
		2. Report Y2/2021 dated 23/09/		
		3. Report Y3/2021 dated 02/12/		
		Refer Surat Akujanji between IOI Jabatan Perlindungan Alam Sek Syarat Alam Sekitar", Proposed F	itar dated 09/04/2012, "Syarat-	

		Belura	Palm Plantation At Ladang Sabah Group Estates, District Of Beluran, By IOI Corporation Berhad".(JPAS/PP/02/600-1/11/1/117).					
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 -	The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily. Discharge quality of mill effluent, especially Biochemical Oxygen				was in legal eading	Complied	
		Demar by acc submit Enviror schedu	Demand (BOD), is regularly monitored. Effluent Analysis conducted by accredited laboratory, DYNAKEY Laboratories Sdn Bhd and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. First Schedule (regulation 10(2)) Quarterly Return Form Report reference as below: -					
		Qtr.	Period	Report Date	ВО	D Limit <2	0	
		1 st	01/01-31/03/2021	17/04/2021	17.60	18.70	16.90	
		2 nd	01/04-31/06/2021	12/07/2021	2.50	12.20	13.70	
		3 rd	01/07-30/09/2021	13/11/2021	19.20	18.90	16.00	
		4 th	01/10-31/12/2021	10/01/2022	18.40	17.30	19.20	
		Verified Stack Emission Monitoring Report for Ladang Sabah POM.					POM.	
		1 st Half 2021 Date: 10/07/2021						
			nce: LSPOM/ST-B2/	2021/1				
		Boiler: No. 2						

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Emission: 393.76 against limit 150.00 (mg/m3@12%CO2)

Remarks: Refer "Lesen Pelanggaran" No.005200: <400mg/m3

valid until 30/08/2022

1st Half 2021 Date: 28/07/2021

Reference: LSPOM/ST-B3/2021/1

Boiler: No. 3

Emission: 377.51 against limit 150.00 (mg/m3@12%CO2)

Remarks: Refer "Lesen Pelanggaran" No.005200: <400mg/m3

valid until 30/08/2022

2nd Half 2021 Date: 04/01/2022

Reference: LSPOM/ST-B3/2021/2

Boiler: No. 3

Emission: 350.71 against limit 150.00 (mg/m3@12%CO2)

Remarks: Refer "Lesen Pelanggaran" No.005200: <400mg/m3

valid until 30/08/2022

Verified 3rd Party Monitoring Audit has been conducted as per requirement in the Jadual Pematuhan No.003445 (JAS.SHQ.600-3/1/96). Report dated 01/12/2021 by Bufflow Engineering Sdn Bhd (003345/005200(1)/2021) was verified.

003345/005200(1)/2021) was verified.

Environmental Impact Assessment dated 18/01/2021, Section 3.0 Identification of Potential Source of GHG Emission and GHG Reduction Plan was referred. Among identification were:

Palm Oil POME



		Utilize Methane C POME to Biogas P Biogas Engine to Continuous pond desil all of the biological eff whole year by using g			
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	The water consumption Summary of Water Consumption Period: July 2020 – July 20	onsumption Monitoring	monitored by mill. Refer g. Data as below: -	Complied
		FFB, MT	Water, L	Water/ FFB	
		247,133.15	578,359.00	11.55	
		Period: July 2021 – D			
		FFB, MT	Water, L	Water/ FFB	
		126,577.45	278,985.00	10.41	
Criterio	on 7.9: Efficiency of fossil fuel use and the use of renewable energy is opting	nised			
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 -	Environmental Impact was referred. Diesel Monitoring Plar	nuary 2022; Section 3.2	Complied	
		Avoid purchasing dealers that conta	sel from unauthorized		
		Maintain and mon effectively to redu	hicles and diesel genset emission		
		To record the us respective mainter		icles, genset and their	

		ve maintenance maximize engine.	
Monitoring of diesoperating units. Tusing the RSPO GH	he data was th		•
The monitoring wa per FFB for the yea as below: -	•	,	
Laukin Estate			
Period	FFB, Mt	Diesel, L	Diesel/FFB
Jul'20-June'21	33,627.03	456,223.00	13.56
July'21-Dec'21	29,100.56	450,395.00	15.47
Bimbingan 1 Estate	e		
Period	FFB, Mt	Diesel, L	Diesel/FFB
Jul'20-June'21	18,738.77	440,461.00	23.51
July'21-Dec'21	13,195.77	431,256.00	32.68
Terusan Baru Esta	te		
Period	FFB, Mt	Diesel, L	Diesel/FFB
Jul'20-June'21	38413.00	267664	6.97
July'21-Dec'21	24773.14	20725	0.84
Ladang Sabah PON	М		
Period	FFB, Mt	Diesel, L	Diesel/FFB
Jul'20-June'21	247,221.89	350,729.00	1.42



		July'21-D	ec'21	126,577.45	244,611.00	0 1.93	
					on the usage of am for operation	f fibre and shell for n.	
				July	2020 – June 20	021	
			Pr	oduce	Despatch/ store	Boiler	
		Shell	17!	526.32	12268.42	5257.90	
		Fibre	300	045.12	9013.54	21031.58	
				July 20	121 – December	2021	
			Pr	oduce	Despatch/ store	Boiler	
		Shell	88	360.44	6202.31	2658.13	
		Fibre	15	189.32	4556.8	10632.52	
	n 7.10: Plans to reduce pollution and emissions, including greenhouse gall to minimise GHG emissions.	ases (GHG),	are dev	eloped, impl	emented and m	onitored and new d	evelopments are
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.		red, in	clusive of gas		is being conducted , particulate / soot	Complied
	- Critical (Major) compliance -		The Environment Impact Assessment -Management Actions Plans and continuous improvement plan dated January 2022 was referred.				
		Calculator v	The GHG emissions for Year 2021 was verified through Palm GHG Calculator version 4. Source of the emissions were mainly due to fossil fuel consumption, POME treatment and consumption of				



		fertilizer. Based on the verification of records, all the sampled issuance was traceable.	
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 -	 Environmental Impact Assessment dated January 2022; Section 3.6 was referred. GHG Reduction Monitoring Plan Mill GHG Emission from the production must not exceed the natural fuel GHG emission with saving 35% (Current -2016), 50% (2017) and 60% (2018). The GHG value from RSPO Palm GHG will be monitored closely The main source of GHG such as POME and diesel usage will be monitored to make sure there are reduction on GHG over the time. Estates To do cup calibration on all fertilizer based on the recommendation by agronomist Continue using EFB in order to reduce the application of N based fertilizer To apply the EFB as mulch in the field in one layer to avoid release of methane due to anaerobic respiration To monitor the EFB application to minimize the usage of inorganic fertilizer which can reduce the emission of Greenhouses Gases. 	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Environmental Impact Assessment dated January 2022; Section 3.6 was referred. GHG Reduction Monitoring Plan was implemented and monitored by the management. RSPO has made a compulsory for submitting GHG beginning	Complied
		1/1/2017. Ladang Sabah Certification Unit had used RSPO Palm	



			GHG v4.0 calculator as a tool. Records were maintained individually in the respective office.				
Criterio	on 7.11: Fire is not used for preparing land and is prevented in the mana	iged area					
7.11.1	(C) Land for new planting or replanting is not prepared by burning.- Critical (Major) compliance -	replanting o	There is no new planting activity at Ladang Sabah Sdn Bhd. Only replanting of existing oil palm has been conducted. Refer Replanting programme for the year 2022 until 2026.				
		Estate	Laukin, Ha	Bimbingan 1, Ha	Terusan Baru, Ha		
		Year 2022	228.00	329.00	194.00		
		Year 2023	220.00	344.00	208.00		
		Year 2024	215.00	-	-		
		Year 2025	215.00	-	-		
		Year 2026	215.00	-	-		
	the method of stacking. The burning method is Sighted "Sura Jabatan Perl JPAS/PP/02/6 Hectares Oil District Of Be Estate have p	of land clearing we is no land pre- le is no land pre- lod. at Aku Janji" bet- indungan Alam 500-1/11/1/117 ` Palm Plantation luran, By IOI Cor	was felling, chippi paration of land ween IOI Corpora Sekitar dated 30 'Proposed Replan At Ladang Saba poration Berhad".	2021A, PM2021B, ng, debolling and for replanting by ation Berhad with 0/03/2012. Refernting of 16,688 h Group Estates, d its management			

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7.11.2	The unit of certification establishes fire prevention and control measures	 The fallow period between land preparations i.e. felling, stacking and replanting to be minimised thus reduce the soil erosion periods To adopt zero burning method. The felled palms should be stacked in such way to promote soil erosion mitigation e.g. placing of stacks along contours To plant leguminous cover plants immediately after land preparation especially at sloppy area to reduce the land erosion. Mechanical roto slasher weeding to reduce chemical during palm immature stage. Ladang Sabah estates has established fire prevention team. Refer 	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 -	"Carta Organisasi Jawtankuasa Pelan Tindakan kecemasan (ERP) 2022 (Laukin Estate) dated 01/01/2022. Training has been conducted for the year 2021. Sighted evidence of training material, attendance, and photos. Laukin Estate: 13/08/2021 Bimbingan 1 Estate: 09/01/2021 Terusan Baru Estate: 26/04/2021	Compilea
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Engagement with adjacent stakeholders was done during External Stakeholder Consultation Meeting — Through Letter dated 14/01/2022. Refer "Borang Penilaian Impak Sosial Dan Alam Sekitar Kumpulan Ladang Sabah". Refer Section S8 in the Feedback Form.	Complied

Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forests. HCVs and HCS forests in the managed area are identified and protected or enhanced.

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 new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	Not applicable since there is no land clearing after November 2005.	Not Applicable
7.12.2	 (C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. 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 - 	The HCV reassessment for Ladang Sabah Complex had been conducted internally where report entitled "High Conservation Value Assessment Management Action Plans & Continuous Improvement Plans" dated January 2018 was prepared. The assessment has also involved the relevant stakeholder such as the Sabah Forest Department and Sabah Wildlife Department. Based on the assessment, it has covered the certification unit's landscape level. Among the conservation identified includes natural waterways (river and tributaries), forest reserves (Segaliud Lokan) and steep terrain areas. High Conservation Value & Conservation Area, Management Actions Plans & Continuous Improvement Plan has been prepared. Latest review was conducted as below: Laukin Estate: 16/01/2022 Bimbingan 1 Estate: 01/01/2022 Terusan Baru Estate: 10/01/2022 Management Plan was prepared as per latest review for HCV Assessment: To provide riparian buffer zone according to DID Guideline To conduct regular patrolling at the river area to ensure no pollution i.e. rubbish etc in the area To demarcate the buffer zone with clear marking	Complied

		 To train the workers on the riparian zones To erect signboard of prohibited activity To provide at least 5m buffer zone to avoid potential contamination from chemical and fertilizer To allow natural vegetation at buffer zone to reduce erosion To conduct drinking water quality test to ensure the water quality is monitored 	
7.12.3	Indicator is not applicable in Malaysia context		Not Applicable
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 -	Not applicable since there is no land clearing after November 2005.	Complied
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 -	No local communities have been identified in self-declared HCV areas within sampling Estate.	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.	The RTE assessment was incorporated in the HCV report and evaluation. Therein providing wildlife database based on categories of: -	Complied



	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 -	 List of protected birds List of protected plants Footprint identification guidelines Among RTE species identified in the external HCV 1 Segaliud Lokan Forest Reserve, adjacent with Bimbingan 1 Estate which protected under Protection of wildlife Act 1972 (Act 76), Sabah Wildlife Conservation and Enactment 1997 and IUCN Re List 2008 such as Elephant, long tail macaque, short tail macaque, eagles, sambar deer, wild boar and other wildlife animals were sighted along the boundary as reported in High Conversation Value and Conservation Area dated January 2018 reviewed on 17/01/2022. Education programmes such as training/briefing and signage were given to the workforce. Records of trainings were maintained by the operating units for verification. Sample of training at Bimbingan 1 Estate on 15/12/2021 during muster ground. IOI Group in collaboration with Sabah Wildlife Department has appointed personnel as Honorary Wildlife Warden as per Government Gazette no. 49: KPKAS: 500-14/2KII.2 (120) dated 07/03/2019. Sample at Bimbingan 1 Estate, the Assistant Manager was appointed as Wildlife Warden as per certificate reviewed and Authority Card reviewed while at Terusan Baru Estate, the Manager 	
		Sample at Bimbingan 1 Estate, the Assistant Manager was appointed as Wildlife Warden as per certificate reviewed and	
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.	No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15	Not Applicable



	- Minor compliance -	November 2018 within Ladang Sabah POM certification unit. Thus, this indicator is not available.	
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 -	November 2005, or without prior HCV-HCSA assessment since 15	



Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Ladang Sabah POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO₂e/tProduct
СРО	0.73
PKO	0

Extraction	%
OER	20.26
KER	5.29

Production	t/yr
FFB Process	247,133.15
CPO Produced	50081.275
PKO Produced	13067.118

Land Use		На
OP Planted Area		22536.00
OP Planted on peat		0.00
Conservation (forested)		221.87
Conservation (non-forested)		0.00
7	Total	22757.87

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	107190.00	6.62	60849.91	25.7 3	0.00	0.00	168039.91	32.3 5
CO ₂ Emission from fertilizer	8682.96	0.54	1043.62	0.44	0.00	0.00	9726.58	0.98
NO ₂ Emission	5494.22	0.02	990.88	0.42	0.00	0.00	6485.10	0.44
Fuel Consumption	3683.96	0.02	148.44	0.06	0.00	0.00	3832.40	0.08
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-122917.98	-0.50	-56816.37	- 24.0 3	0.00	0.00	-179734.35	24.6 3
Conservation Sequestration	-1682.05	-0.01	-352.49	-0.15	0.00	0.00	-2034.55	0.16
Total	451.12	0.00	5863.99	2.48	0.00	0.00	6315.10	2.48



*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB
Emission		
POME	40833.73	0.17
Fuel Consumption	1043.79	0.00
Grid Electricity Utilization	0.00	0.00
Credit	·	
Export of Grid Electricity	0.00	0.00
Sales of PKS	-1825.05	-0.01
Sales of EFB	0.00	0.00
Total	40052.4	0.16

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

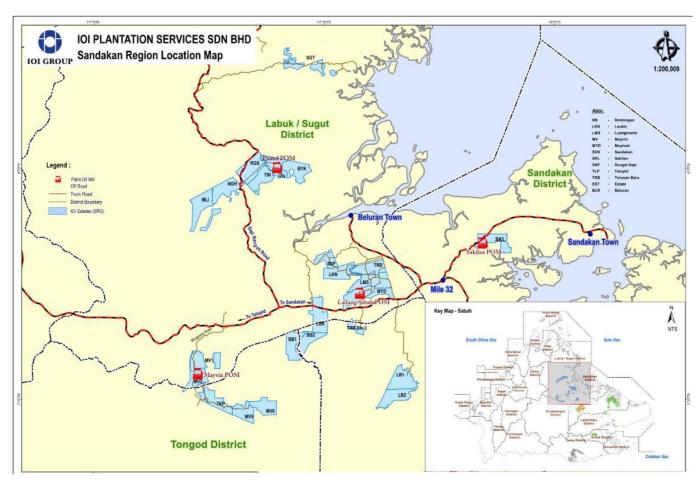
^{*}This mill has no kernel crusher operation.

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) (%)	23					
Divert to methane captured (energy generation) (%)	32					



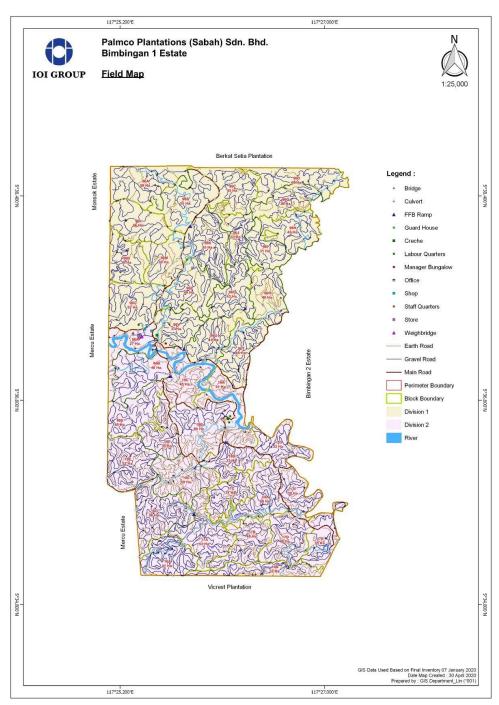
Appendix C: Location Map of Certification Unit and Supply bases





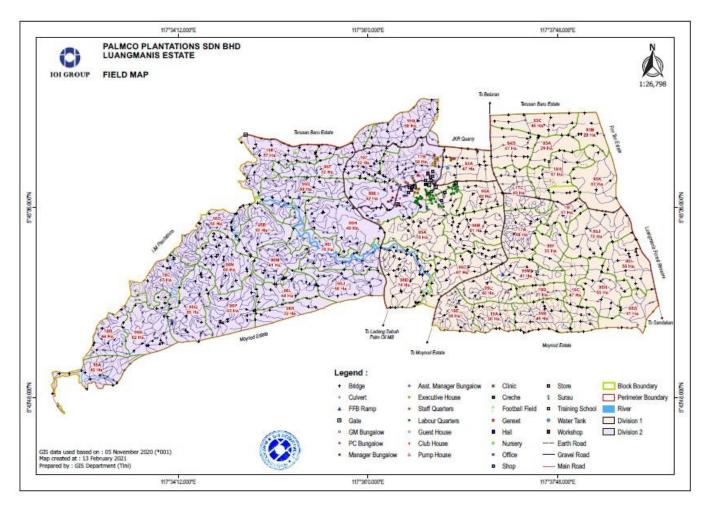
Appendix D: Estates Field Maps

Bimbingan 1 Estate



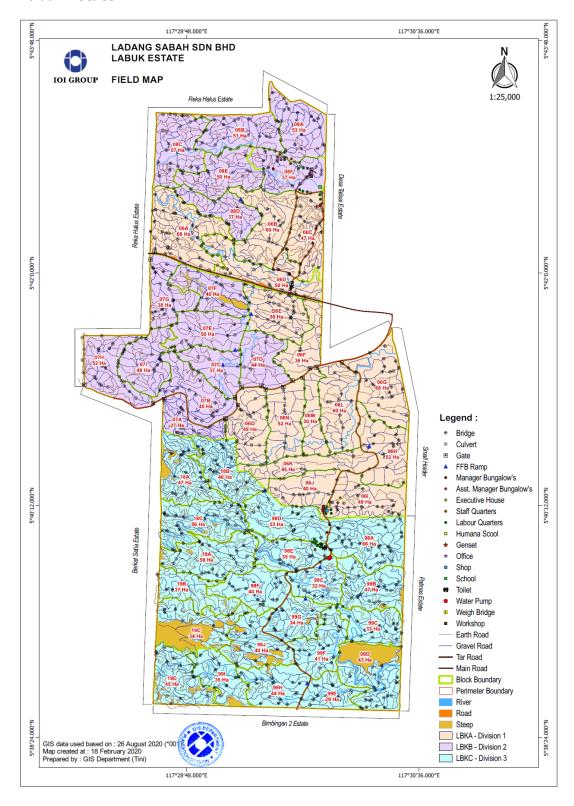


Luangmanis Estate



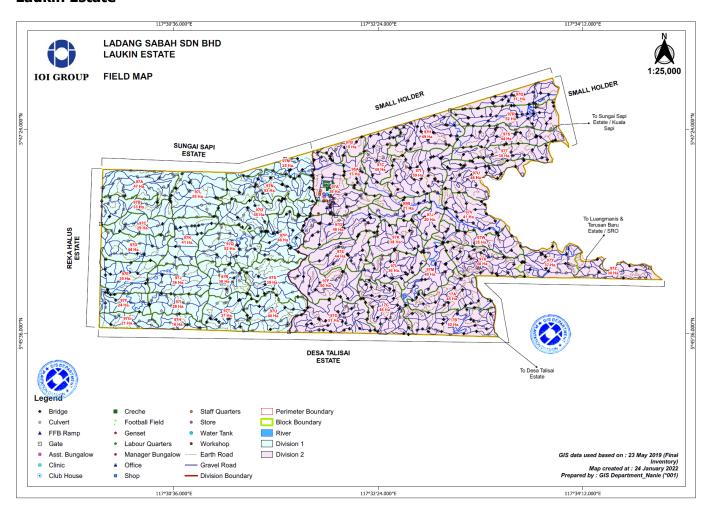


Labuk Estate



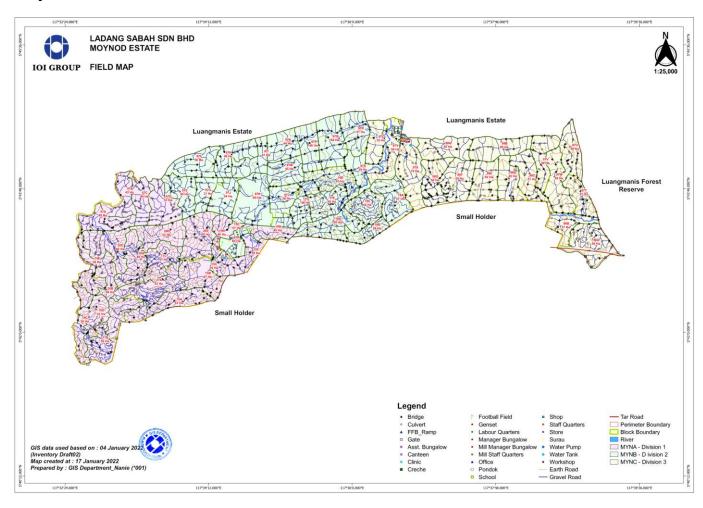


Laukin Estate



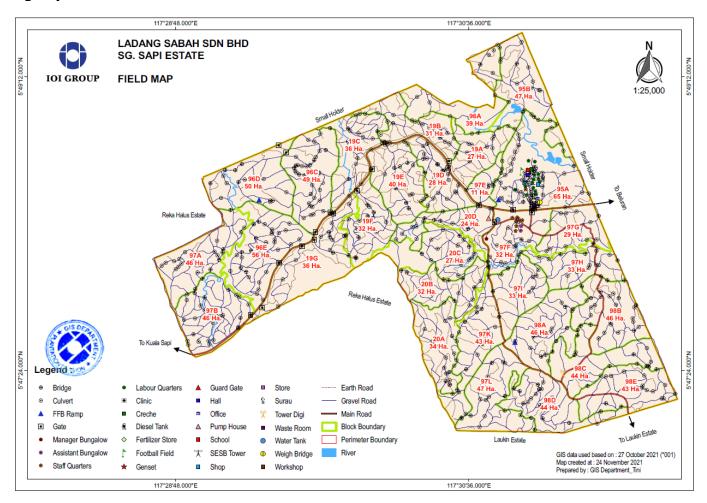


Moynod Estate



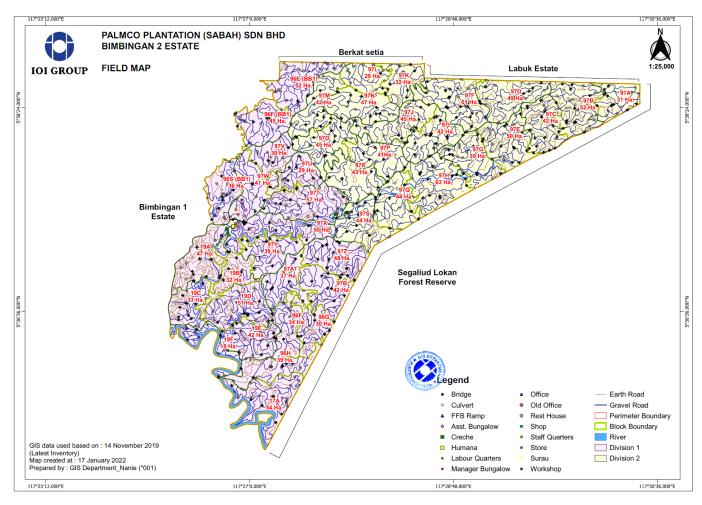


Sg Sapi Estate



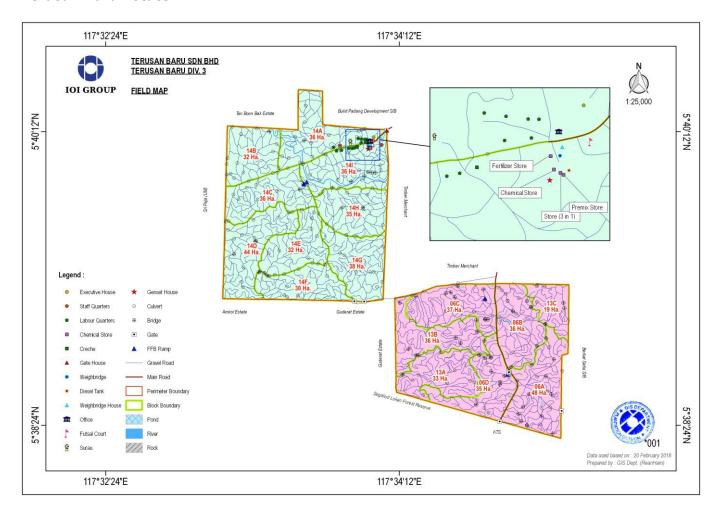


Bimbingan 2 Estate

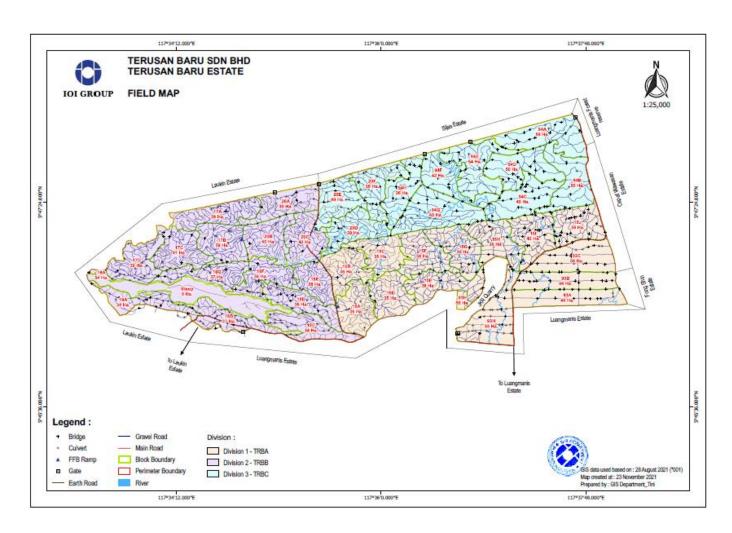




Terusan Baru Estate









Appendix E: List of Smallholder Registered and sampled (Not Appplicable)

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB	joining	Smallholder ID	
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area	Production (MT)			
	Not Applicable									
					·					
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