

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 3)
- Extension of Scope

<p>Client Company Name / Parent Company: Sime Darby Plantation Berhad</p>
<p>Client Company / Parent Company Address: New Britain Palm Oil Limited – West New Britain</p>
<p>Certification Unit: Mosa POM, Kumbango POM, Waraston POM, Kapiura POM and Numundo POM and Supply Base</p> <p>Location of Certification Unit: 3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province, Papua New Guinea</p>
<p>Date of Final Report: 07/12/2023</p>

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	New Britain Palm Oil Limited – West New Britain Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill and Supply Base		
Location / Address	3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province, Papua New Guinea		
Website	http://www.simedarbyplantation.com/		
Management Representative	Zaralyn Yakopa	E-mail	Zaralyn.Yakopa@simedarbyplantation.com
Telephone	+675 7107133	Facsimile	+675 9852003

2. Certification Information			
Certificate Number	RSPO 728122	Certificate Start Date	10/09/2023
Date of First Certification	10/09/2008	Certificate Expiry Date	09/09/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory, and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 3) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> PNG & SI National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	Please refer table 4
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
C543037	MS1480:2019	DNV	17/10/2025
C543019	MS1480:2019	DNV	30/10/2025
C543026	MS1480:2019	DNV	01/11/2025
C503033	MS1480:2019	DNV	01/11/2025
C543041	MS1480:2019	DNV	01/11/2025
C543029	MS1480:2019	DNV	30/10/2025
C543009	MS1480:2019	DNV	18/10/2025
NBPOL-111212-C1/Y11	Halal Australian Standard	Halal Australia Trust	01/05/2024
NBPOL-111212-C2/Y11	Halal Australian Standard	Halal Australia Trust	01/05/2024
NBPOL-111212-C3/Y11	Halal Australian Standard	Halal Australia Trust	01/05/2024
NBPOL-111212-C4/Y11	Halal Australian Standard	Halal Australia Trust	01/05/2024
NBPOL-111212-C5/Y11	Halal Australian Standard	Halal Australia Trust	01/05/2024
NBPOL-111212-C6/Y11	Halal Australian Standard	Halal Australia Trust	01/05/2024
NBPOL-111212-C7/Y11	Halal Australian Standard	Halal Australia Trust	01/05/2024
NBPOL-111212-C8/Y11	Halal Australian Standard	Halal Australia Trust	01/05/2024
C859480GMP-01.2021	GMP + Feed Safety Assurance	Control Union Certified	19/08/2024
C861486GMP-01.2021	GMP + Feed Safety Assurance	Control Union Certified	19/08/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Mosa Oil Mill (60mt/hr)	Bebere Plantation, Mosa, West New Britain, Papua New Guinea	5° 37' 20.93"S	150° 14' 13.74"E
Kumbango Oil Mill (60mt/hr)	Kumbango Plantation, Mosa, West New Britain, Papua New Guinea	5° 35' 31.00"S	150° 12' 43.00"E
Kapiura Oil Mill (60mt/hr)	Bilomi Plantation, Kapiura, West New Britain, Papua New Guinea	5° 37' 25.00"S	150° 41' 03.00"E
Numundo Oil Mill (80mt/hr)	Healla Plantation, Healla, West New Britain, Papua New Guinea	5°31'25.09"S	150° 2'3.28"E
Waraston Oil Mill (60mt/hr)	Numundo Plantation, Talasea, West New Britain, Papua New Guinea	5° 29' 02.00"S	150° 05' 12.00"E
Bebere Estate	Mosa, West New Britain, Papua New Guinea	5° 36' 50.69"S	150° 15' 03.60"E
Kumbango Estate	Mosa, West New Britain, Papua New Guinea	5° 36' 19.08"S	150° 11' 49.02"E

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Togula Estate	Mosa, West New Britain, Papua New Guinea	5° 40' 02.53"S	150° 11' 11.00"E
Dami / Waisisi Estate	Hoskins, West New Britain, Papua New Guinea	5° 30' 51.05"S	150° 27' 07.41"E
Kautu Estate	Kapiura, West New Britain, Papua New Guinea	5° 31' 16.57"S	150° 03' 18.45"E
Kaurausu Estate	Kapiura, West New Britain, Papua New Guinea	5° 31' 14.88"S	150° 45' 09.36"E
Morao Estate	Kapiura West New Britain, Papua New Guinea	5° 31' 15.47"S	150° 45' 09.32"E
Bilomi / Loata Estate	Kapiura, West New Britain, Papua New Guinea	5° 37' 02.99"S	150° 40' 40.79"E
Healla Estate	Healla, West New Britain, Papua New Guinea	5° 31' 16.57"S	150° 2' 55.536"E
Garu Estate	Healla, West New Britain, Papua New Guinea	5° 30' 46.42"S	149° 59' 34.72"E
Daliavu Estate	Kulu, West New Britain, Papua New Guinea	5° 34' 18.56"S	150° 01' 21.42"E
Sapuri Estate	Kulu, West New Britain, Papua New Guinea	5° 34' 11.14"S	149° 59' 34.72"E
Malalimi Estate	Rigula, West New Britain, Papua New Guinea	5° 39' 26.64"S	150° 26' 29.39"E
Rigula Estate	Malilimi, West New Britain, Papua New Guinea	5°36'21.42"S	150°28'36.73"E
Numundo Estate	Talasea, West New Britain, Papua New Guinea	5° 29' 58.92"S	150° 05' 11.76"E
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	Talasea, West New Britain, Papua New Guinea	5° 21' 35.96"S	150° 02' 09.38"E
Volupai / Lotomgam Natupi / Goruru Estate	Talasea, West New Britain, Papua New Guinea	5° 15' 53.99"S	150° 00' 34.20"E
Lolokoru Estate	Talasea, West New Britain, Papua New Guinea	5° 7'9.00"S	150° 5'25.66"E
Ove Estate	Silovuti, West New Britain, Papua New Guinea	5° 34' 48.36"S	149° 41' 39.84"E
Tamare Estate	Silovuti, West New Britain, Papua New Guinea	5°37'20.40"S	149°44'1.08"E
Kaipura Division Smallholders	Kapiura, West New Britain, Papua New Guinea	5° 32' 56.01"S	150° 52' 6.63"E
Talasea Division	Talasea, West New Britain, Papua New Guinea	5° 16' 49.33"S	150° 00' 22.39"E
Nahavio Division	Mosa, West New Britain, Papua New Guinea	5° 35' 38.83"S	150° 13' 35.18"E
Kavui Division	Mosa, West New Britain, Papua New Guinea	5° 35' 37.32"S	150° 18' 39.24"E
Siki Division	Hoskins, West New Britain, Papua New Guinea	5° 28' 08.44"S	150° 27' 08.92"E
Buvussi Division	Malalimi, West New Britain, Papua New Guinea	5° 37' 42.96"S	150° 22' 46.02"E
Community Planting	West New Britain, Papua New Guinea	5° 30' 19.01"S	150° 32' 08.37"E
Independent Farms (more than 50 ha)	West New Britain, Papua New Guinea	5° 39' 03.38"S	150° 01' 22.43"E

5. Description of Supply Base		
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)	<input type="checkbox"/> Yes (please refer to Principle 7 for details)

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Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bebere Estate	1,881.00	-	345.71	2,226.71	84.47
Kumbango Estate	2,243.10	-	367.70	2,610.80	85.92
Togula Estate	1,364.30	-	144.90	1,509.20	90.40
Dami / Waisisi Estate	924.30	-	582.70	1,507.00	61.33
Kautu Estate	2,952.00	552.56	776.04	4,280.60	68.96
Kaurausu Estate	1,900.00	451.44	36.20	2,387.64	79.58
Morao Estate	807.00	-	41.16	848.16	95.15
Bilomi/Loata Estate	2,572.50	225.00	954.29	3,751.79	68.57
Healla Estate	2,876.80	67.19	1,276.31	4,220.30	68.17
Garu Estate	2,562.40	596.00	551.20	3,709.60	69.07
Daliavu Estate	2,058.60	-	425.50	2,484.10	82.87
Sapuri Estate	1,773.40	-	407.50	2,180.90	81.32
Malalimi Estate	2,527.00	63.00	1,247.00	3,837.00	65.86
Rigula Estate	2,519.60	952.00	248.40	3,720.00	67.73
Numundo Estate	1,509.40	216.81	918.96	2,645.17	57.06
Navarai/Karato Mini Estate/Kavugara Development Cooperation European Union	687.40	-	416.37	1,103.77	62.28
Volupai/Lotomgam Natupi/Goruru Estate	1,492.40	-	500.19	1,992.59	74.90
Lolokoru Estate	2,049.60	-	403.50	2,453.10	83.55
Ove Estate	2,374.50	-	1,166.50	3,541.00	67.06
Tamare Estate	1,957.90	868.00	715.10	3,541.00	55.29
Kaipura Division Smallholders	4,096.09	128.57	1,348.53	5,573.19	73.50
Talasea Division	2,804.10	-	-	2,804.10	100.00
Nahavio Division	4,035.30	224.14	749.09	5,008.53	80.57
Kavui Division	5,332.85	25.64	398.08	5,756.57	92.64
Siki Division	4,566.38	1.84	756.15	5,324.37	85.76
Buvussi Division	4,446.36	0.81	506.36	4,953.53	89.76
Community Planting	529.40	2.67	623.58	1,155.65	45.81
Independent Farms (more than 50 ha)	675.00	0.36	25.01	700.37	96.38

Total	65,518.68	4,376.03	15,932.03	85,826.74	76.34
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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bebere Estate	-	1,056.00	825.00	-	1,881.00	-
Kumbango Estate	233.10	469.60	1,540.40	-	2,010.00	233.10
Togula Estate	-	-	1,364.30	-	1,364.30	-
Dami / Waisisi Estate	28.10	175.10	721.10	-	896.20	28.10
Kautu Estate	-	840.10	2,111.90	-	2,952.00	-
Kaurausu Estate	85.82	1,103.28	710.90	-	1,814.18	85.82
Morao Estate	217.77	-	-	589.23	589.23	217.77
Bilomi/Loata Estate	-	756.00	1,816.50	-	2,572.50	-
Healla Estate	215.30	1,486.20	454.00	721.30	2,661.50	215.30
Garu Estate	847.80	893.30	-	821.30	1,714.60	847.80
Daliavu Estate	733.50	204.90	1,120.20	-	1,325.10	733.50
Sapuri Estate	-	-	1,773.40	-	1,773.40	-
Malalimi Estate	-	897.50	1,629.50	-	2,527.00	-
Rigula Estate	-	-	2,519.60	-	2,519.60	-
Numundo Estate	113.10	559.00	210.80	626.50	1,396.30	113.10
Navarai/Karato Mini Estate/Kavugara Development Cooperation European Union	335.75	-	233.70	117.95	351.65	335.75
Volupai/Lotomgam Natupi/Goruru Estate	-	-	1,288.30	204.10	1,492.40	-
Lolokoru Estate	-	-	2,049.60	-	2,049.60	-
Ove Estate	-	1,748.90	625.60	-	2,374.50	-
Tamare Estate	-	1,957.90	-	-	1,957.90	-
Kaipura Division Smallholders	123.00	705.09	2,260.00	1,008.00	3,973.09	123.00
Talasea Division	72.00	822.10	1,612.00	298.00	2,732.10	72.00
Nahavio Division	86.00	778.00	2,177.30	994.00	3,949.30	86.00
Kavui Division	86.00	602.00	3,241.85	1,403.00	5,246.85	86.00
Siki Division	140.00	430.00	2,785.38	1,211.00	4,426.38	140.00
Buvussi Division	65.00	508.00	2,409.00	1,464.36	4,381.36	65.00
Community Planting	-	228.40	175.00	126.00	529.40	-

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Independent Farms (more than 50 ha)	26.00	279.00	355.00	15.00	649.00	26.00
Total (ha)	3,408.24	16,500.37	36,010.33	9,599.74	62,110.44	3,408.24

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 2022 - Aug 2023)	Actual (Jul 2022 – Jun 2023)		Forecast (Sep 2023 - Aug 2024)
		Previous license period (Jul 2022 - Aug 2022)	Current license period (Sep 2022 - Jun 2023)	
Bebere Estate	50,110.71	10,871.18	46,605.74	52,220.17
Kumbango Estate	45,420.34	7,470.28	38,621.04	34,907.91
Togula Estate	29,369.25	5,279.40	22,828.35	26,536.78
Dami / Waisisi Estate	9,653.00	3,207.64	16,343.38	17,499.50
Kautu Estate	62,092.00	12,058.36	56,072.66	69,604.69
Kaurausu Estate	45,945.00	7,211.48	39,498.00	50,541.52
Morao Estate	7,045.00	2,192.24	9,065.78	3,286.39
Bilomi/Loata Estate	60,849.00	14,525.90	67,341.78	69,311.68
Healla Estate	52,685.00	8,431.32	48,706.10	51,100.47
Garu Estate	28,381.00	5,232.40	29,054.56	37,199.54
Daliavu Estate	31,203.00	4,350.00	21,276.38	21,498.34
Sapuri Estate	25,104.00	6,692.02	30,373.74	34,264.45
Malalimi Estate	59,301.00	10,996.42	58,792.57	66,354.61
Rigula Estate	55,966.00	10,426.00	49,956.46	56,747.01
Numundo Estate	21,241.00	3,898.00	21,940.86	21,826.89
Navarai/Karato Mini Estate/Kavugara Development Cooperation European Union	11,010.00	1,903.44	9,737.10	8,053.00
Volupai/Lotomgam Natupi/Goruru Estate	30,607.00	4,947.40	20,266.58	23,977.88
Lolokoru Estate	46,728.00	7,119.68	32,851.76	46,065.86
Ove Estate	54,834.00	8,311.14	48,663.64	43,252.46
Tamare Estate	36,028.00	2,354.48	30,441.74	68,824.22
Kaipura Division Smallholders	54,782.00	7,922.09	42,406.43	63,927.17

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Talasea Division	71,455.00	8,670.00	42,973.36	47,689.81
Nahavio Division	52,210.00	10,070.74	52,834.59	57,380.44
Kavui Division	79,180.00	18,082.91	65,853.67	84,312.61
Siki Division	57,941.00	9,726.22	53,324.09	63,447.06
Buvussi Division	70,968.00	9,682.71	56,269.08	63,561.70
Community Planting	16,704.00	5,289.60	43,434.73	21,342.37
Independent Farms (more than 50 ha)	10,235.00	1,480.88	7,096.38	14,967.67
Total	1,177,047.30	1,271,034.48		1,219,702.20

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (key in period)	Actual (key in period)		Forecast (key in period)
		Previous license period (Jul 2022 - Aug 2022)	Current license period (Sep 2022 - Jun 2023)	
Nil	-	-	-	-
Total	-	-	-	-

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (key in period)	Actual (key in period)		Forecast (key in period)
		Previous license period (Jul 2022 - Aug 2022)	Current license period (Sep 2022 - Jun 2023)	
Nil	-	-	-	-
Total	-	-	-	-

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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	Jul-22	103,262.66	-	103,262.66
2	Aug-22	108,829.64	-	108,829.64
3	Sep-22	105,242.18	-	105,242.18
4	Oct-22	108,803.40	-	108,803.40
5	Nov-22	116,115.59	-	116,115.59
6	Dec-22	108,294.17	-	108,294.17
7	Jan-23	111,561.06	-	111,561.06
8	Feb-23	95,239.72	-	95,239.72
9	Mar-23	106,305.50	-	106,305.50
10	Apr-23	94,162.15	-	94,162.15
11	May-23	111,133.26	-	111,133.26
12	Jun-23	102,085.15	-	102,085.15
TOTAL		1,271,034.48	-	1,271,034.48

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)

Mosa Oil Mill

Estimated last year (Sep 2022 - Aug 2023)	Actual (Jul 2022 – Jun 2023)		Forecast (Sep 2023 - Aug 2024)
	Previous license period (Jul 2022 - Aug 2022)	Current license period (Sep 2022 - Jun 2023)	
FFB	FFB		FFB
251,500.00 mt	49,609.56 mt	263,745.22 mt	289,094.00 mt
	TOTAL	313,354.78 mt	
CPO (OER: 24.30%)	CPO (OER: 22.22%)		CPO (OER: 22.43%)
61,114.50 mt	11,194.24 mt	58,441.87 mt	64,831.00 mt
	TOTAL	69,636.11 mt	
PK (KER: 6.53%)	PK (KER: 6.53%)		PK (KER: 5.95%)
16,422.95 mt	2,779.16 mt	17,681.40 mt	17,202.00 mt
	TOTAL	20,460.56 mt	

Kumbango Oil Mill

Estimated last year (Sep 2022 - Aug 2023)	Actual (Jul 2022 – Jun 2023)		Forecast (Sep 2023 - Aug 2024)
	Previous license period (Jul 2022 - Aug 2022)	Current license period (Sep 2022 - Jun 2023)	
FFB	FFB		FFB
260,051.00 mt	46,418.62mt	213,753.76 mt	256,269.00 mt
	TOTAL	260,172.38 mt	
CPO (OER: 24.30%)	CPO (OER: 21.05%)		CPO (OER: 21.48%)
63,192.39 mt	10,053.22 mt	44,717.18 mt	55,034.00 mt
	TOTAL	54,770.40 mt	
PK (KER: 6.53%)	PK (KER: 6.39%)		PK (KER: 6.31%)
16,981.33 mt	2,791.75 mt	13,829.91 mt	16,165.00 mt
	TOTAL	16,621.66 mt	

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Numundo Oil Mill

Estimated last year (Sep 2022 - Aug 2023)	Actual (Jul 2022 – Jun 2023)		Forecast (Sep 2023 - Aug 2024)
	Previous license period (Jul 2022 - Aug 2022)	Current license period (Sep 2022 - Jun 2023)	
FFB	FFB		FFB
335,500.00 mt	45,858.42 mt	205,073.87 mt	244,887.00 mt
	TOTAL	250,932.29 mt	
CPO (OER: 24.30%)	CPO (OER: 20.86%)		CPO (OER: 20.95%)
81,526.50 mt	9,426.04 mt	42,918.21 mt	51,308.00 mt
	TOTAL	52,344.25 mt	
PK (KER: 5.55%)	PK (KER: 5.86%)		PK (KER: 5.89%)
18,610.50 mt	2,863.42 mt	11,848.23 mt	14,415.00 mt
	TOTAL	14,711.65 mt	

Kapiura Oil Mill

Estimated last year (Sep 2022 - Aug 2023)	Actual (Jul 2022 – Jun 2023)		Forecast (Sep 2023 - Aug 2024)
	Previous license period (Jul 2022 - Aug 2022)	Current license period (Sep 2022 - Jun 2023)	
FFB	FFB		FFB
267,996.00 mt	46,398.22 mt	241,254.83 mt	317,790.20 mt
	TOTAL	287,653.05 mt	
CPO (OER: 25.84%)	CPO (OER: 22.97%)		CPO (OER: 22.80%)
69,255.00 mt	10,767.09 mt	55,299.18 mt	72,472.00 mt
	TOTAL	66,066.27 mt	
PK (KER: 8.17%)	PK (KER: 5.93%)		PK (KER: 5.81%)
21,908.15 mt	2,737.30 mt	14,316.67 mt	18,448.00 mt
	TOTAL	17,053.97 mt	

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Waraston Oil Mill

Estimated last year (Sep 2022 - Aug 2023)	Actual (Jul 2022 – Jun 2023)		Forecast (Sep 2023 - Aug 2024)
	Previous license period (Jul 2022 - Aug 2022)	Current license period (Sep 2022 - Jun 2023)	
FFB	FFB		FFB
62,000.00 mt	23,807.48 mt	135,114.50 mt	111,662.00 mt
	TOTAL	158,921.98 mt	
CPO (OER: 24.30%)	CPO (OER: 20.42%)		CPO (OER: 19.82%)
15,066.00 mt	4,833.60 mt	27,614.31 mt	22,130.00 mt
	TOTAL	32,447.91 mt	
PK (KER: 6.53%)	PK (KER: 6.35%)		PK (KER: 5.60%)
4,048.60 mt	1,354.68 mt	8,738.00 mt	6,253.00 mt
	TOTAL	10,092.68 mt	

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Jul-22	22,512.03	5,993.69
2	Aug-22	23,451.16	6,532.62
3	Sep-22	23,038.09	6,596.76
4	Oct-22	23,893.72	6,964.04
5	Nov22	25,519.44	7,457.19
6	Dec22	23,566.85	7,095.20
7	Jan-23	23,911.33	6,931.55
8	Feb-23	20,219.32	5,799.25
9	Mar-23	22,989.36	6,676.15
10	Apr-23	20,458.59	5,780.29
11	May-23	23,966.81	6,994.78
12	Jun-23	21,738.26	6,119.00
TOTAL		275,264.94	78,940.52

11. Summary of Actual Volume sold

Mosa Oil Mill

Current License period (Sep 2022 – Jun 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	47,277.62	0	0	11,164.25	58,441.87
PK (MT)	17,681.40	0	0	0	17,681.40
Credits	0	0	0	0	0
Previous License period (Jul 2022 – Aug 2023)					
CPO (MT)	9,794.24	0	0	1,400.00	11,194.24
PK (MT)	2,779.16	0	0	0	2,779.16
Credits	0	0	0	0	0

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Kumbango Oil Mill

Current License period (Sep 2022 – Jun 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	33,552.93	0	0	11,164.25	44,717.18
PK (MT)	13,829.91	0	0	0	13,829.91
Credits	0	0	0	0	0
Previous License period (Jul 2022 – Aug 2023)					
CPO (MT)	8,653.22	0	0	1,400.00	10,053.22
PK (MT)	2,791.75	0	0	0	2,791.75
Credits	0	0	0	0	0

Numundo Oil Mill

Current License period (Sep 2022 – Jun 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	31,753.96	0	0	11,164.25	42,918.21
PK (MT)	11,848.23	0	0	0	11,848.23
Credits	0	0	0	0	0
Previous License period (Jul 2022 – Aug 2023)					
CPO (MT)	8,026.04	0	0	1,400.00	9,426.04
PK (MT)	2,863.42	0	0	0	2,863.42
Credits	0	0	0	0	0

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Kapiura Oil Mill

Current License period (Sep 2022 – Jun 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	44,134.93	0	0	11,164.25	55,299.18
PK (MT)	14,316.67	0	0	0	14,316.67
Credits	0	0	0	0	0
Previous License period (Jul 2022 – Aug 2023)					
CPO (MT)	9,367.09	0	0	1,400.00	10,767.09
PK (MT)	2,737.30	0	0	0	2,737.30
Credits	0	0	0	0	0

Waraston Oil Mill

Current License period (Sep 2022 – Jun 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	16,450.06	0	0	11,164.25	27,614.31
PK (MT)	8,738.00	0	0	0	8,738.00
Credits	0	0	0	0	0
Previous License period (Jul 2022 – Aug 2023)					
CPO (MT)	3,433.60	0	0	1,400.00	4,833.60
PK (MT)	1,354.68	0	0	0	1,354.68
Credits	0	0	0	0	0

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11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Non-disclosure 1	Various Numbers consolidated	87,794.19	-
2	Non-disclosure 2	Various Numbers consolidated	76,307.53	3,260.49
3	Non-disclosure 3	Various Numbers consolidated	18,141.37	-
4	Non-disclosure 4	Various Numbers consolidated	30,200.60	18,610.61
5	Non-disclosure 5	Various Numbers consolidated	-	51,012.18
6	Non-disclosure 6	Various Numbers consolidated	-	6,057.24
TOTAL			212,443.69	78,940.52

11B. Records of certified CPO & PK Sold under other schemes since the last audit (Jul 2022 - Jun 2023)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (Jul 2022 - Jun 2023)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Various Numbers consolidated	62,821.25	-
TOTAL		62,821.25	-

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (Jul 2022 - Jun 2023)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
N/A	N/A	N/A	N/A
TOTAL			N/A

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12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

13. Independent Smallholders Actual Sold Tonnage / Volume (Jul 2022 - Jun 2023)							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@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 **07/08/2023-18/08/2023**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 13/06/2023. The public notification ended on 12/07/2023.

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

The Critical NC close out on-site assessment was conducted on **16-17/10/2023**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. PNG & Solomon Islands 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 was 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.

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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 (Re-certification)	Year 2 (ASA 3_1)	Year 3 (ASA 3_2)	Year 4 (ASA 3_3)	Year 5 (ASA 3_4)
Mosa Oil Mill	✓	✓	✓	✓	✓
Kumbango Oil Mill	✓	✓	✓	✓	✓
Kapiura Oil Mill	✓	✓	✓	✓	✓
Numundo Oil Mill	✓	✓	✓	✓	✓
Waraston Oil Mill	✓	✓	✓	✓	✓
Bebere Estate			✓		
Kumbango Estate	✓			✓	
Togula Estate		✓			
Dami / Waisisi Estate			✓		
Kautu Estate		✓			
Kaurausu Estate				✓	
Morao Estate				✓	
Bilomi / Loata Estate			✓		
Healla Estate		✓			
Garu Estate	✓				✓
Daliavu Estate			✓		
Sapuri Estate		✓			
Malalimi Estate	✓				✓
Rigula Estate	✓				✓
Numundo Estate			✓		
Navarai / Karato Mini Estate / Kavugara Development				✓	

Cooperation European Union					
Volupai / Lotomgam Natupi / Goruru Estate				✓	
Lolokoru Estate			✓		
Ove Estate		✓			✓
Tamare Estate	✓				✓
Kaipura Division Smallholders	✓	✓	✓	✓	✓
Talasea Division	✓	✓	✓	✓	✓
Nahavio Division	✓	✓	✓	✓	✓
Kavui Division	✓	✓	✓	✓	✓
Siki Division	✓	✓	✓	✓	✓
Buvussi Division	✓	✓	✓	✓	✓
Community Planting	✓	✓	✓	✓	✓
Independent Farms (more than 50 ha)	✓	✓	✓	✓	✓

Tentative Date of Next Visit: July 15, 2024 - July 26, 2024

Total Number of Mandays: 43.5

2.2 BSI Assessment Team

Name	Role	Competency
Valence Shem (VSH)	Team Leader	<p>Education: Holds a Bachelor of Technology BTech (Hons.) Industrial Technology, University of Science Malaysia.</p> <p>Work Experience: He has more than 20 years of working experience with 9 years in oil palm plantation industry and 13 years in management system auditing since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> <p>Training attended: He has completed ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Assessor Course, MSPO Awareness Training, ISO 45001 Lead Auditor Course, SMETA Auditor training, HCV-HCS training and RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit: Estate & mill best practice, legal requirements, HIRARC, OHS, continual improvement, contractor’s affair, and Supply Chain.</p>
Mohd Razaleigh Mohamad (MRM)	Team Member	<p>Education: Graduated Bachelor in (Scs.) Plantation Management and Agrotechnology from Universiti Teknologi Mara (UiTM) in 2012.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as Senior Assistant Manager with Tradewinds Plantation Berhad from 2012 until 2017 and has been doing audit for RSPO P&C, MSPO, Global G.A.P and Organic since 2017 until now.</p> <p>Training attended: He has completed ISO 9001:2015 (2020), ISO 14001:2015 (2017), ISO 45001:2018 (2021), Endorsed RSPO P&C Lead Auditor Course (2018), Endorsed MSPO P&C Lead Auditor Course (2017), Social Accountability SA8000 (2019), Endorsed RSPO Independent Smallholder (IHS), (2022).</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p> <p>Aspect covered in this audit:</p>

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		Policy and commitment, social requirements, human rights, workers' welfare, Stakeholder Consultation, Legal Requirements, and legality of land.
Mohamed Zainal (MHZ)	Hidhir Abidin Team Member	<p>Education: Bachelor's degree in chemical engineering, National University of Malaysia, 2006</p> <p>Work Experience: He has 7 years working experience in palm oil industry and 5 years specifically on palm oil milling. He is also third-party auditing experience for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO, RSPO P&C, RSPO SCCS, RBA.</p> <p>Training attended: He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO P&C Refresher Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, Endorsed RSPO SCCS Refresher Course, Introduction to HCV, HCS & GIS training, SMETA requirement training and Endorsed RSPO Independent Smallholder (ISH) Auditor Training</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Legal requirements, environment, wastes management, GHG, HCV, and Supply Chain.</p>
Vijay Pakirisamy (VKP)	Kanna Team Member	<p>Education: Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p>Work Experience: He has 10 years' experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C and SCCS).</p>

		<p>Language proficiency: Fluent in English, Bahasa Malaysia, Tamil.</p> <p>Aspect covered in this audit: Smallholders field audits, smallholders training and records, GAP for smallholders, support smallholder inclusion, and related legal requirements.</p>
Dr. Suhaili Bin Sahari	Independent Peer Reviewer	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001:2015 Lead Auditor and Internal Auditor 2) Occupation Health & Safety 3) ISO 14001:2015 Standard 4) RSPO Standards: RSPO P&C 2018 MY-NI 2019 5) MSPO Standards: MS 2530:2013 part 1, 2 , 3 and 4 6) Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 7) HACCP MS 1480:2019 8) GAP Standard: Global GAP, Euro GAP <p>ASI Peer Reviewer training</p>

Accompanying Persons:

Name	Role
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<p>Max Muakul Kuduk (MMK)</p>	<p>Local technical expert and translator. He holds a Master of Science Majoring in Modern Botanical Methods and a Bachelor of Science Majoring in Plant Science. He has experience in environmental and health & safety auditing. He has conducted conservation assessment for oil palm industry. His roles is as technical expert during the audit.</p>
<p>Alice Topa (ATP)</p>	<p>He holds a Master of Environment Management: The University of Queensland, Australia and Bachelor of Tropical Agriculture, University of Vudal, PNG. skilled and experienced in environment sustainability and, health and safety program management and monitoring, implementing legal and international standard audits such as Roundtable Sustainable Palm Oil (RSPO) and ISO 14001 (Environment Management Systems) standards.</p>

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2.3 Assessment Plan

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

Date	Time	Subjects	VSH	MRM & ATP	MHZ	VKP & MMK
Monday 07/08/2023	0800-0830	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	✓	✓	✓	✓
	0830-1300	Mosa POM Site visit: FFB receiving, workshop, wastes management, effluent treatment, OSH & ERP, environment issues, water treatment, staff, workers and contractor interviews, housing and facility inspection, clinic, etc.	✓	✓	✓	
		Smallholders field visit & interview – Kumali VOP (7 SH)				✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)		✓		
	1300-1400	Lunch break				
	1400-1630	Mosa POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓	
		Smallholders field visit & interview – continued				✓
1630-1700	Interim closing briefing	✓	✓	✓	✓	
Tuesday 08/08/2023	0830-1300	Tamare Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers' housing, clinic, etc.	✓	✓	✓	
		Smallholders field visit & interview – Dagi LSS (7 SH) and Akami Estate				✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)		✓		
	1300-1400	Lunch break				

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Date	Time	Subjects	VSH	MRM & ATP	MHZ	VKP & MMK
	1400-1630	Tamare Estate Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	
		Smallholders field visit & interview – continued				✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Wednesday 09/08/2023	0830-1300	Kapiura POM Site visit: FFB receiving, workshop, wastes management, effluent treatment, OSH & ERP, environment issues, water treatment, staff, workers and contractor interviews, housing and facility inspection, clinic, etc.	✓	✓	✓	
		Smallholders field visit & interview – Marapu VOP (7 SH) and Pavi				✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)		✓		
	1300-1400	Lunch break				
	1400-1630	Kapiura POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓	
		Smallholders field visit & interview – continued				✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Thursday 10/08/2023	0830-1300	Rigula Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers' housing, clinic, etc.	✓	✓	✓	
		Smallholders field visit & interview – Siki LSS (7 SH) and Umali				✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers,		✓		

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Date	Time	Subjects	VSH	MRM & ATP	MHZ	VKP & MMK
		surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)				
	1300-1400	Lunch break				
	1400-1630	Rigula Estate Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	
		Smallholders field visit & interview – continued				✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Friday 11/08/2023	0830-1300	Malilimi Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc.	✓	✓	✓	
		Smallholders field visit & interview – Rapuri VOP (7 SH) and Moramora				✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)		✓		
	1300-1400	Lunch break				
	1400-1630	Malilimi Estate Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	
		Smallholders field visit & interview – continued				✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Saturday 12/08/2023	0830-1300	Waraston POM Site visit: FFB receiving, workshop, wastes management, effluent treatment, OSH & ERP, environment issues, water treatment, staff, workers and contractor interviews, housing and facility inspection, clinic, etc.	✓	✓	✓	

Date	Time	Subjects	VSH	MRM & ATP	MHZ	VKP & MMK
		Smallholders field visit & interview – Kilu/Patanga VOP (8 SH)				✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)		✓		
	1300-1400	Lunch break				
	1400-1630	Waraston POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓	
		Smallholders field visit & interview – continued				✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Monday 14/08/2023	0830-1300	Garu Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc.	✓	✓	✓	
		Smallholders field visit & interview – Kambili VOP (7 SH)				✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)		✓		
	1300-1400	Lunch break				
	1400-1630	Garu Estate Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	
		Smallholders field visit & interview – continued				✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Tuesday		Numundo POM	✓	✓	✓	

Date	Time	Subjects	VSH	MRM & ATP	MHZ	VKP & MMK	
15/08/2023	0830-1300	Site visit: FFB receiving, workshop, wastes management, effluent treatment, OSH & ERP, environment issues, water treatment, staff, workers and contractor interviews, housing and facility inspection, clinic, etc.					
		Smallholders field visit & interview – Liapo VOP (7 SH)				✓	
	1000-1200	Stakeholder consultation Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)			✓		
		1300-1400	Lunch break				
	1400-1630	Numundo POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓		
		Smallholders field visit & interview – continued					✓
1630-1700	Interim closing briefing	✓	✓	✓			
Wednesday 16/08/2023	0830-1300	Kumbango Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc. and document review.	✓	✓	✓		
		Smallholders field visit & interview – Mosa VOP (7 SH) and John Siwisika				✓	
	1000-1200	Stakeholder consultation Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)			✓		
		1300-1400	Lunch break				
	1400-1630	Kumbango Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc. and document review.	✓	✓	✓		
Smallholders field visit & interview – continued						✓	

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Date	Time	Subjects	VSH	MRM & ATP	MHZ	VKP & MMK
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Thursday 17/08/2023	0830-1300	Kumbango POM Site visit: FFB receiving, workshop, wastes management, effluent treatment, OSH & ERP, environment issues, water treatment, staff, workers and contractor interviews, housing and facility inspection, clinic, etc.	✓	✓	✓	
		Smallholders field visit & interview – Buvussi LSS (8 SH)				✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.)		✓		
	1300-1400	Lunch break				
	1400-1630	Kumbango POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓	
		Smallholders field visit & interview – continued				✓
	1630-1700	Interim closing briefing	✓	✓	✓	
Friday 18/08/2023	0830-1300	Kumbango POM Continue with outstanding elements	✓	✓	✓	
		Smallholder’s Office – documentation reviews				✓
	1300-1400	Lunch break				
	1400-1500	Audit team discussion & preparation for closing meeting	✓	✓	✓	✓
	1500-1600	Closing meeting	✓	✓	✓	✓

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Date	Time	Subjects	MRM	MMK
Monday 16/10/2023	0900-1100	Verification of effective implementation of corrective actions for Kumbango POM- Major Non-conformities 2376409-202308-M2, 2376409-202308-M6	√	√
	1100-1115	Travel to Smallholder Department	√	√
	1115-1300	Verification of effective implementation of corrective actions at smallholder’s department- Major Non-conformities-2376409-202308-M1	√	√
	1300-1400	Lunch	√	√
	1400-1530	Verification of effective implementation of corrective actions at Numundo POM- Major Non-conformities 2376409-202308-M5	√	√
	1530-1700	Verification of effective implementation of corrective actions at Garu Estate, Major Non-conformities 2376409-202308-M5	√	√
	Tuesday	0900-1100	Verification of effective implementation of corrective actions at Kapiura POM, Major Non-conformities 2376409-202308-M5	√
1100-1115		Travel to Rigula Estate	√	√
1115-1300		Verification of effective implementation of corrective actions at Rigula Estate- Major Non-conformities 2376409-202308-M7, 2376409-	√	√

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17/10/2023		202308-M8		
	1300-		√	√
	1400	Lunch		
	1400- 1530	Verification of effective implementation of corrective actions at Malilimi Estate- Major Non-conformities 2376409-202308-M4, 2376409-202308-M5, 2376409-202308-M8	√	√
1530- 1700	Verification of effective implementation of corrective actions at Kumbango Estate- Major Non-conformities 2376409-202308-M4	√	√	

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
<p>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?</p>	<p>Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</p>	<p>Complied</p>
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management. Refer TBP approval dated 13/07/2023.</p>	<p>Complied</p>
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	<p>There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 Julai 2023 for these Estate.</p> <ol style="list-style-type: none"> 1. Ladang Panjang Estate-1,796.19 ha 2. Rantau Panjang Estate, Napal Estate / Karang Ringin Estate- 1,843.73 ha. 3. Mangun Jaya Estate- 1,398.55 ha 4. Sungai Jernih Estate- 851.57 ha 5. Pelandjau Estate (PT BAL) & Beturus Estate (PT BAL)- 4,071.76 ha 6. Karya Palma Estate (PT SNP) – 476.70 Ha 7. West and East Estate – 1,452.93 Ha 	<p>Complied</p>

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<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Although there is deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>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?</p>	<p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties were sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/ . ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been</p>	<p>Complied</p>

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<p>assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>excluded in the latest TBP as these 2 assets were disposed.</p>	
<p>Un-Certified Units or Holdings</p>		
<p>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.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification.</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/ 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/ 3. NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/ 4. NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries- 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/ 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/ 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/ 8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/ 9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/ 	<p>Complied</p>

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	<p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</p> <p>11. NBPOL (Ramu Agri Industries Ltd) 06/03/2012 - no comments captured in RSPO website https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</p> <p>14. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</p> <p>Management units for 12 – 14 above were disposed</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed. The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO. As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C. It has been further verified through RSPO complaint tracker, Internet (Media) which there</p>	<p>Complied</p>

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	is no complaint about land conflict has been lodge by stakeholders as at the day of audit.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, no labor dispute issues were reported.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</p> <p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Sime Darby Plantation maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.	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.	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010.</p> <p>The issue is mainly awaiting for Land Titles. The last audit was conducted in July 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SDP operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.</p>	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 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.	Complied

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Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied
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3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>By the definition of the National Interpretation, the smallholders and out-growers attached to NBPOL-WNB are considered as independent smallholders. However, NBPOL-WNB has ensure that these smallholders are certified together with the current certification.</p>	Complied

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP (Only applicable when revision is made)			
								Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Manggala	Indonesia	Manggala Mill	13.836	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -1 Estate	4.919	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -2 Estate	4.922	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -3 Estate	3.995	Certified	Not Applicable	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3.759	Certified	Not Applicable	16-Jan-12					
	Indonesia	Alur Dumai Estate	3.759	Certified	Not Applicable	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	NA		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	Not Applicable	11-Oct-11					
Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	Not Applicable	3-May-13					
	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	Not Applicable	3-May-13					

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	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	Not Applicable	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	Not Applicable	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	Not Applicable	3-May-13					
Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	Not Applicable	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	Not Applicable	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.513	Certified	Not Applicable	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	Not Applicable	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	Not Applicable	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	Not Applicable	16-Mar-12					
Rantau Panjang	Indonesia	Bumi Ayu Estate	2,960.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	Not Applicable	16-Mar-12					

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	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	Not Applicable	16-Mar-12					
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A		Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
Angsana	Indonesia	Angsana Mill	15,151.19	Certified	Not Applicable	6-Jul-11					
	Indonesia	Angsana Estate	3,250.06	Certified	Not Applicable	6-Jul-11					
	Indonesia	Gunung Sari Estate	2,826.94	Certified	Not Applicable	6-Jul-11					

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Mustika	Indonesia	Mustika Mill	14,840.76	Certified	Not Applicable	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	Not Applicable	3-Jul-13					
	Indonesia	Pantai bonati Estate	2,534.00	Certified	Not Applicable	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Kemas Estate	3,511.36	Certified	Not Applicable	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	Not Applicable	5-Jul-11					
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	Not Applicable	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	Not Applicable	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	Not Applicable	30-Dec-11					
	Indonesia	Rantau Estate	4,638.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Selabak Estate (PT SAA)	3,757.67	Certified	Not Applicable	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	Not Applicable	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	Not Applicable	16-Mar-12					
Betung	Indonesia	Betung Mill	7,579.57	Certified	Not Applicable	1-Apr-14					
	Indonesia	Betung Estate	4,266.00	Certified	Not Applicable	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	Not Applicable	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12					

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	Indonesia	Bakau Estate	5,342.14	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	Not Applicable	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	Not Applicable	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10					
Sekunyir	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10					
	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11					
Sukamandang	Indonesia	Sukamandang Estate	3,936.56	Certified	Not Applicable	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	Not Applicable	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pemantang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
Pemantang	Indonesia	Pemantang Estate	3,857.91	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	Not Applicable	5-Jul-11					
	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14					
Lembiru	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					

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	Indonesia	Awatan Estate	3,476.79	Certified	Not Applicable	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	Not Applicable	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A		Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
	Indonesia	East Estate	2,665.48	Certified	Not Applicable	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha	13-Jul-23

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										(West and East Estate) is still in process.	
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Somme Estate	941.56	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Padang Buluh Estate	4,008.47	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Jentayu Estate	2,178.59	Certified	Not Applicable	12-Aug-10	19-20 July 21				
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Chersonese Estate	3,293.72	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Kalumpong Estate	2,716.80	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11	19-20 July 21				
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	Not Applicable	5-Oct-11	19-20 July 21				

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	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11	19-20 July 21			
Malaysia		Tennamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11	19-20 July 21				
Malaysia		Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11	19-20 July 21				
Malaysia		Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11	19-20 July 21				
Bukit Kerayong	Malaysia	Bukit Benut Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11	19-20 July 21				
	Malaysia	Bukit Benut Estate	2,699.28	Certified	Not Applicable	15-Apr-11	19-20 July 21				
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11	19-20 July 21				
East	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10	19-20 July 21				

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West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10	19-20 July 21			
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10	19-20 July 21			
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11	19-20 July 21			
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Kerdau Estate	5,683.04	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11	19-20 July 21			
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 21			
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 21			
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10	19-20 July 21			
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10	19-20 July 21			
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10	19-20 July 21			
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14	19-20 July 21			

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	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14	19-20 July 21				
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14	19-20 July 21				
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10	19-20 July 21			
Malaysia		Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10	19-20 July 21				
Malaysia		Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10	19-20 July 21				
Malaysia		Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10	19-20 July 21				
Malaysia		Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10	19-20 July 21				
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14	19-20 July 21				
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14	19-20 July 21				

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	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14	19-20 July 21				
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14	19-20 July 21				
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10	19-20 July 21				
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10	19-20 July 21				
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bukit Benut Estate	2,799.78	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11	19-20 July 21				

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Hadapan	Malaysia	Hadapan Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11	19-20 July 21			
	Malaysia	Sri Pulai Estate	2,049.87	Certified	Not Applicable	29-Mar-11	19-20 July 21			
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11	19-20 July 21			
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11	19-20 July 21			
	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11	19-20 July 21			
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08	19-20 July 21			
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08	19-20 July 21			
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08	19-20 July 21			
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08	19-20 July 21			
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08	19-20 July 21			
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08	19-20 July 21			
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11	19-20 July 21			
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11	19-20 July 21			
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11	19-20 July 21			
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Tingkeyu Estate	1,881.08	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09	19-20 July 21			
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09	19-20 July 21			

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Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09	19-20 July 21			
	Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09	19-20 July 21			
Lavang	Malaysia	Lavang Oil Mill	24,836.54	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Lavang Estate	4,363.83	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Rasan Estate	3,454.00	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Belian Estate	2,847.00	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Kelida Estate	2,460.00	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Pekaka Estate	2,626.14	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Ruai Estate	2,460.96	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Dulang Estate	2,548.00	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Charquest Estate	1,448.71	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11	19-20 July 21			
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11	19-20 July 21			

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	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11	19-20 July 21				
Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13	19-20 July 21				

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	PNG	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - West Sagarai Estate (212)	345.96	Certified	Not Applicable	15-Feb-13	19-20 July 21				
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Smallholders -North Division (615)	1,022.12	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Smallholders- South Division (866)	1,257.21	Certified	Not Applicable	19-Mar-12	19-20 July 21				

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	PNG	Smallholders -West Division (309)	533.54	Certified	Not Applicable	19-Mar-12	19-20 July 21				
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill	14,606.08	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Gusap East (Gusap) Estate	2,856.45	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Gusap West (Paddock) Estate	3,019.09	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Surinam Estate	2,154.14	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Dumpu Estate	2,254.36	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Ngaru Estate	854.33	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	J Estate (Jephcott) Estate	2,824.01	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Smallholders - Madang VOPs (71)	360.00	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Smallholders - Morobe VOPs (253)	283.70	Certified	Not Applicable	5-Aug-10	19-20 July 21				
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Mamba Oil Mill		Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Embi Estate	1,737.78	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Ambogo Estate	2,040.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sangara Estate	1,780.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sumbiripa Estate	2,545.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13	19-20 July 21				

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	PNG	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13	19-20 July 21				
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kapiura Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Numundo Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Waraston Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Karausu Estate	2,387.64	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Moroa Estate	848.16	Certified	Not Applicable	10-Sep-08	19-20 July 21					

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PNG	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Numundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				

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	PNG	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08	19-20 July 21				
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20	19-20 July 21			There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	PNG	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20	19-20 July 21				
	PNG	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20	19-20 July 21				
	PNG	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20	19-20 July 21				

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 eight (8) Critical, five (5) Minor nonconformities and one (1) Opportunity for Improvement raised. The Mosa POM, Kumbango POM, Waraston POM, Kapiura POM and Numundo 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 #	2376409-202308-M1	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	1.2.1 (Critical)		
Statement of Nonconformity:	Policy for ethical conduct has not been fully implemented. (Implementation of CAP for previous raised minor NC could not be justified. Furthermore, reoccurrence of same issue was observed during the assessment)		
Requirement Reference:	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others.		
Objective Evidence:	<p>1. The implementation of the correction and corrective action plans to address the previously raised minor non-conformity was inadequate. Therefore, the minor non-conformity could not be closed.</p> <p><u>Previous Correction Statement</u></p> <p>Accounts Department to send out fortnightly list to SHA highlighting balance of debt after growers pay is processed. SHA to keep electronic tracker and update OPIC. OPIC to inform growers so that growers are kept up to date on the progress of repayment.</p> <p><u>Auditor’s verification:</u></p> <p>– Based on the verification done, it was confirmed that the list highlighting the balance of debt after growers pay is processed was not sent out to SHA on a fortnightly basis. Latest email correspondence was acknowledged to be dated February 2023.</p> <p><u>Previous Corrective Action Statement</u></p> <p>Procurement and Finance Department to come up with SOP or flowchart to address and capture process of communicating price fluctuation for fertilizer and fertilizer delivery.</p> <p><u>Auditor’s verification:</u></p> <p>There were no evidence of established SOP or Flowchart to address and capture the process of communicating price fluctuation for fertiliser and fertiliser deliveries.</p>		

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	<p>Review of growers' consent form to include section for advising growers of the sudden price change that can occur for deduction.</p> <ul style="list-style-type: none"> – There was no evidence of reviewed consent form being used for fertiliser deduction. The consent form being used did not include section advising growers of the sudden price change. <p>2. Based on the interview with the sampled smallholders, it was identified that the deduction done by NBPOL for the sale of Fertiliser to the smallholders was not in accordance with the consent forms signed by both parties.</p> <p>Reference made to Incident/Accident/Grievance Form (reference Number: SIK 949; Date: 22/05/2023. The smallholder has raised a concern that he has provided consent for NBPOL to deduct K 1,111,10 from his sales of FFB for the purchase of 10 bags of fertiliser since 2022. The consent form was available for verification dated 14/01/2022, undersigned by the grower, OPIC and NBPOL. Deductions made to the smallholder was noted to be at K1,930.50, which exceeds the amount stated in the consent form. The grievance has been closed dated 08/06/2023, stating that the difference is due to fertiliser price changes. This was not communicated to the smallholder and no consent was obtained for the deduction of the additional amount prior to it being deducted from the smallholder.</p> <p>Due to the implementation of the CAP for previously identified minor non-conformity being unable to be closed and this being a reoccurrence of the same issue as previous minor nonconformity, it is escalated to critical non-conformity.</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> 1. Revised the Growers Consent Form created 18th August 2023 now including a section with explanation of fertilizer price fluctuation. Explanation section outlines that the price may fluctuate due to exchange rates or market price of fertilizer. In the event that the price fluctuates from the original agreed price (on the consent form), then another consent form will need to be completed and signed. Therefore, the price that the Smallholder is deducted will not differ from the final Consent Form that they sign. New Form implemented September 2023. 2. Smallholder Fertilizer Sales SOP developed and socialized starting 7th September. The SOP outlines the procedure and documentation trail that will entail sale of fertilizer to Smallholders and identifies the responsibility of internal departments involved in handling fertilizer sales to oil palm growers. It provides clear guidance on the documentation requirement and documentation flow from smallholder requisition, issuance from central stores, distribution of items and accounting.
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • Lack of follow-up and monitoring to ensure the indicated corrective actions from last years' audit were implemented. This is due to lack of accountability and lack of communication between SHA, OPIC and Sustainability Departments. • Since the SOP was not yet developed, the SHA staff were not aware of the requirement to inform the growers of the price change / fluctuation.
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. Meetings and awareness conducted with: <ul style="list-style-type: none"> • SHA, OPIC, OPRA • SHA, Finance & Procurement / Stores Departments;

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	<p>All relevant departments Heads are aware of the content of the new SOP and the various roles and responsibilities each will have.</p> <ol style="list-style-type: none"> 2. Awareness on the Fertilizer Sales SOP and revised Growers Consent Form covered with all personnel involved in handling Smallholder fertilizer sales under Finance, Central Stores and SHA. This also includes all SHA staff involved in communicating and dealing with Smallholder grievances. 3. Weekly (after Smallholder pay processed) Smallholder Fertilizer debt summary report executed. 4. Awareness regarding the purchasing of fertilizer, deductions and price fluctuation conducted with growers.
<p>Assessment Conclusion:</p>	<ol style="list-style-type: none"> 1) NBPOL has established procedure in the document title "Smallholder fertilizers sale procedure" which clearly stated the process for application to purchase fertilizers updated on 18th August 2023 version 01. In the SOPs clearly stated that smallholder's department need to request for quotation 1st before provide the consent form to smallholder. That will be the final fertilizers prize. Stated in the consent form, that all smallholders has rights to accept or reject the offer. Fertilizers will be sent once the consent form signed. 2) Sample of fertilizers purchase document sighted (quotation from the procurement, consent letter signed by smallholders). There is evidence that fertilizers prices stated in the consent form is same with quotation. Sample as per below <ol style="list-style-type: none"> a. Consent form: Steven Tutmulai, SH ID;062.0109; total K757.50 Quotation: dated 12/10/2023 reservation number 102481216 total K757.50 for Urea fertilizer b. Consent form: W.Kimnie, SH ID;006-2009 total K726.00 for Urea fertilizer quotation: dated 03/10/2023 reservation number102487533 total K726.00 c. Consent form: Miriam Gao SH ID 026.0157 total K578.60 Quotation: dated 16/10/2023 reservation number102485155 total K578. 3) Meeting has been conducted between Smallholder Affair OPIC Hoskins ad PNG OPRA on 06/09/2023 and between Smallholders affair with store department/procument on 19/09/2023. 4) Weekly smallholders' fertilizer sighted in the document smallholders: deduction listing by deduction time and sample has been taken for period 02/10/2023-08/10/2023 and 25/09/2023-01/10/2023. 5) Awareness has been conducted for grower. Sample has been taken Siki LSS on 04/10/2023 and Saralokok on 10/10/2023 6) Awareness also has been conducted through the national broadcasting corporation (NBC) radio twice a week. Recording has been verified by auditor. 7) Reimbursement to smallholders has been done based on analysing the smallholders that purchased fertilizers from January 2022 until August 23 with total 185 smallholders. Sample has been taken for smallholder's name Levi Bilit with total K1044.00 has been paid on 14/10/2023

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	<p>8) Interview with 13 smallholders confirmed that that reimbursement has been paid.</p> <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2376409-202308-M2	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	3.4.3 (Critical)		
Statement of Nonconformity:	Social management plan has not been properly implemented.		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. Smallholder requirements: Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable.		
Objective Evidence:	<p>Social management plan sighted for 5 years that documented in the "Social management plan for mills in West New Britain Province Kumbango POM 2019-2023. Several management plans have been listed which some has been classified as completed and ongoing. However, there is no evidence that the management plan has implemented. Sample has been taken for some management plan:</p> <p>a) Mill management need to organize awareness to female employees ensuring their understanding on the company policy on maternity leave, breastfeeding time and to conduct new mother.</p> <p>Verification: There was no new mother assessment conducted. A new mother was interviewed, and she mentioned that there is no consultation was done by the management.</p> <p>b) Mill management reconsider casual workers become permanent employees after 6 months of casual works instead of renewing casual extension contracts unless labor is required.</p> <p>Verification: 3 samples workers has been recruited for more than 7 months for core jobs.</p> <p>Kumbango POM</p> <p>i) Worker AA, Recruited 23/01/2023, Kernel Station Operator</p> <p>ii) Worker BB, Recruited 23/01/2023, Oil Room Operator</p> <p>iii) Worker CC Recruited 23/01/2023, Effluent Pond</p>		
Corrections:	<p><u>Item A</u></p> <p>1. Appointed officer responsible for coordinating new mothers needs and the associated training and awareness has now been employed, starting end of October.</p>		

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	<ol style="list-style-type: none"> 2. Training has been conducted with Kumbango POM Management on new mother needs and requirements. 3. Mill Management with assistance from Sustainability Department have conducted a consultation and awareness session with the new mothers. <p><u>Item B</u></p> <ol style="list-style-type: none"> 1. The 3 temporary workers at Kumbango POM have since been confirmed as permanent employees.
Root Cause Analysis:	<p><u>Item A</u></p> <ul style="list-style-type: none"> • Management was not aware of the requirement to conduct new mothers needs and ensure consultation done. This was due to the fact that there was no appointed officer to execute the training with the site Management and the identified new mothers at Kumbango POM. <p><u>Item B</u></p> <ul style="list-style-type: none"> • Management was not aware of the requirement that an employee cannot be employed for more than 6 months on a temporary contract. This was due to the fact that relevant training was not conducted with site Management.
Corrective Actions:	<ol style="list-style-type: none"> 1. Refresher training / briefing has been conducted with all Mill & Estate Managers on new mothers need assessments process and their rights / requirements and other requirements as per the Social Management Plan. 2. Briefing conducted to OU Managers regarding company policy on employment contracts and the terms – casual, permanent and temporary. 3. Develop and circulate clear guidelines document on temporary & permanent employment. 4. Checkroll system amended to flag temporary workers who have been working for 5 months. An error notice will appear and processing will not be allowed unless there is a change in the employment type to permanent or temporary contract ended.
Assessment Conclusion:	<p><u>CAP evidence 1</u></p> <ol style="list-style-type: none"> 1. Training has been conducted the management of Kumbango POM related to domestic violence policy and new mother assessment needs on 02/10/2023 done by Maryanne Allan and Zaralyn Yakopa. 2. Communication of new mother assessment with assistance of sustainability department and community workers health staff on 20/07/2023 and 29/09/2023 3. New mother assessment records available where consultation has been done on 13/10/2023 by Dorothy Baki to new mother Fidelia Noate, mother with kids 1 year and 6 months 4. New mother`s need assessment report 2022-23 done by sustainability and quality management department. 5. Interview with the new mother confirmed that the assessment has been conducted.

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	<p><u>CAP evidence 2</u></p> <ol style="list-style-type: none"> 1. Memo from human resource manager dated 18/09/2023 on "employment of "casual" & "temporary" workers sent by Billy Molowia to communicate term of permanent, casual and temporary workers. Stated in the memo that there will be no casual or temporary workers will be recruited more than 6 months and will be absorb as permanent workers if there is any vacancy. 2. Training for temporary, casual and permanent workers recruitment has been done to all Operating Units Manager on 02/10/2023. As per interview, they can demonstrate their understanding on recruitment of temporary, casual and permanent workers. 3. Employment contract for newly absorb as permanent workers for 3 workers sighted and has been signed by the workers. 4. Interview with 3 workers that has been absorbed as permanent workers. <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2376409-202308-M3	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	3.8.6 (Critical)		
Statement of Nonconformity:	Reporting format stipulated in the company's RSPO supply chain internal audit procedure was not used		
Requirement Reference:	<p>Internal Audit</p> <p>i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>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 NBPOL maintain the internal audit records and reports.</p>		
Objective Evidence:	NBPOL had conducted RSPO SCCS internal audits for all the five mills on various dates. However, the reporting format stipulated in their procedure was not used.		
Corrections:	MG26 has been updated to reflect auditor checklist that is now used for the internal annual SCCS audits.		

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Root Cause Analysis:	SCCS Management Guideline (MG26) was reviewed by Sustainability department however the internal audit template was overlooked and not updated to reflect the newly introduced Internal Auditor template.
Corrective Actions:	All the Sustainability team members briefed of the updated MG 26 SCCS Management Guideline
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Revision of the SOPs sighted in the document supply chain management guideline revision 14 dated August 2023 2. Communication of the revised SOPs sighted based on the records dated 19/09/2023 <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>

Non-conformity			
NCR Ref #	2376409-202308-M4	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	4.1.1 (Critical)		
Statement of Nonconformity:	Human right policy established has not been implemented.		
Requirement Reference:	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, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
Objective Evidence:	<p>NBPOL-WNB adopted human right policy which was documented in "Human right policy" dated 12/07/2023. Stated in policy the management commitment to respect, support and uphold fundamental human rights as per stated in the Universal Declaration for human rights which covers employees, suppliers, smallholders, and local communities.</p> <p>Stated in the procedure documented in "Disciplinary policy and procedure", March 2017 clause 4.1.3, Disorder behaviour and fighting at workplace that any employee including his/her dependent/relatives involve fighting and abusive behaviour at workplace or any company premises may result in employees been suspended and further dismissal.</p> <p><u>Kumbango Estate:</u></p> <p>A worker (referred as WA) has been dismissed following an incident where her husband assaulted an office clerk (referred to as Staff AA) within the housing compound on 05/03/2023. A statement issued on the same date, SHEQ001, alleged that the worker had provoked her husband to attack staff AA. However, there is a lack of concrete evidence supporting WA's culpability, and the investigation was conducted only three months later, specifically on 23/06/2023.</p> <p><u>Malilimi Estate:</u></p>		

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	<p>An incident occurred involving a worker who was apprehended by the police for causing the death of his sister's husband. This took place as he was defending his sister (referred to as XX) from an attack by her husband within the housing compound on 03/01/2023. Within 24 hours, XX was terminated by the estate's management in order to uphold a peaceful environment on the premises. This termination occurred without any compensation, and the management also agreed that XX was not guilty.</p>
<p>Corrections:</p>	<p>Malilimi Estate</p> <p>Employee in question had already paid their superannuation however was not correctly paid the rest of the remainder of her fortnight wages. This has since been done.</p> <p>Kumbango and Malilimi Estates</p> <p>Issue a reminder to all Operating Units in WNB that managers should not decide on cases that potentially lead to termination. Rather, they should be referred immediately to HR Manager.</p>
<p>Root Cause Analysis:</p>	<p>Lack of understanding and inaccurate implementation of the company's disciplinary policy and procedure among the managers and was not referred to HR for guidance as required for any termination.</p>
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. All cases related to wrongdoing shall be referred to HR and will be investigated based on the requirements stated in WNB Disciplinary Policy & Procedure 2. The cases will be investigated by WNB Disciplinary Committee with an oversight from NBPOL Corporate HR as stated in the TORs 3. Amend clause 4.1.3 of the Disciplinary Policy & Procedure to incorporate disciplinary action relating to the conduct of employee's dependent. 4. Socialize the Disciplinary Policy and Procedure across all OU's in WNB both to management and workers.
<p>Assessment Conclusion:</p>	<ol style="list-style-type: none"> 1. Revised SOPs sighted for disciplinary policy and procedure updated on September 2023 4th revision. Revision has been made on clause 4.1.3 related disciplinary action to the conduct of employees` dependent. 2. Memo from the general manager for NBPOL- WNB, Mohamad azhazha Abdul Aziz in terminations/dismissal cases should be refer to Human Resources Department 3. Communication of the policy and procedure has been done to the management by human resources department on 02/10/2023 while for workers has been done on 13/10/2023 for Malilimi Estate. While for Kumbango Estate, communication to staff has been done on 12/10/2023 and for workers done on 12/10/2023, 02/10/2023 and 14/10/2023. 4. Interview with the workers on awareness of the new policy and procedure by the auditor. <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>

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Non-conformity			
NCR Ref #	2376409-202308-M5	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	Ineffective monitoring on compliance to legal working hours, overtime, rest periods, and employment termination.		
Requirement Reference:	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.		
Objective Evidence:	<p>a) Stated in Employment Contract 1978 Chapter 373, clause 35 (2) terminations of contract without notice, where a party to a contract has given notice of intention to terminate under section 34, either party may, without waiting for the expiry of that notice, terminate the contract by paying to the other party a sum of equal to the amount of salary that would have accrued to the employee during the period of notice.</p> <p>Stated in the employment contract appendix5; termination of employment, 2 weeks’ notice if employed 1 year or more and less than 5 years.</p> <p><u>Malilimi Estate</u></p> <p>One worker has been terminated in 24hours without notice due to one incident with the aim of upholding a harmonious atmosphere within the compound. Despite the worker's tenure of over 2 years with the company, no compensation has been paid.</p> <p>b) Stated in Employment Contract 1978 Chapter 373, clause#49(1); Maximum daily hours and rest period that subject to subsection (5) and to variation under registered award, an employee shall not be required to work more than 12 hours in any one day</p> <p><u>Numundo POM</u></p> <p>A worker has been detected working beyond the prescribed limit of overtime, totalling more than 44 hours, for 2 consecutive months. The authorization for this overtime has been formally submitted in the document OT Approval Form. Samples have been taken for the second fortnight of both May 2023 and June 2023.</p> <p>c) Stated in Employment Contract 1978 Chapter 373, clause#49(2)(b); Maximum daily hours and rest period, shall not be required to work for more than 5 hours without a meal or rest period of not less than 30 minutes of he has been allowed a rest period of at least 10 minutes during that period; and (c) shall not be required to work for more than 5 hours without a meal or rest period of not less than 40 minutes of he has not been allowed a rest period of at least 10 minutes</p> <p><u>Numundo POM/Kapiura POM</u></p> <p>As per interview with the sample workers, the workers informed that they have not been informed on breaking hours/rest periods. The workers mentioned that they need to work for 8 hours consecutively. Subsequent verification with the management corroborated the absence of documented break and rest hours, and</p>		

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	<p>no evidence could be found indicating that such information had been conveyed to the workers.</p> <p>d) Inconsistent workers salary payment. <u>Malilimi Estate</u> Sample of 5 loose fruits picker has been taken and found out there is inconsistent payment for total loose fruit tonnage base on the pay slips and productivity records for PPE#20230521. Details as per below Workers AA Total L/F tonnage as per productivity records: 3630kgs Total L/F tonnage as per pay slips: 3,810kgs Different: 180kgs <u>Garu Estate</u> Sample of 5 harvesters has been taken and found out there is inconsistent payment for total bunches base on the pay slips and productivity records for PPE#20230521. Details as per below Workers AB Total bunches as per productivity records: 1,237 bunches Total bunches as per pay slips: 1,051bunches Different: 186 bunches</p> <p>e) At Malilimi Estate, a worker (Emp. ID #E793) was given three days of medical leave by the Health Extension Officer i.e., 29, 30 and 31/08/2022) due to injury from work. Based on company’s policy, he shall be paid for 3 days under “injury leave” term. However, based on his pay slip (PPE#20220911), he was only paid for 1 day under “sick pay” term.</p>
<p>Corrections:</p>	<p>Item A</p> <ol style="list-style-type: none"> 1) Payment in lieu was processed on the 12/09/23. Contact has been made with previous employee and arrangements made to pass on the payment on 29/09/23. 2) Payment in lieu has been done for the workers base on remittance advice number 286878, total K348.26 and there is evidence that worker already collect the cheque base on photo provided and document signed. Interview unable to be done since the worker are not staying in the compound anymore. <p>Item B</p> <p>The operation of the powerhouse operator at Mill requires certified personnel. During the audit assessment, the powerhouse station was temporarily operated by 2 certified staff and 1 probationary staff. Due to the shortage of 1 certified employee, the 2 existing certified employees were required the work additional hours. The probationary staff members have now completed their probation period on. 21.08.2023, and the powerhouse station operates with a 3-staff on 8 hour shifts.</p>

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This situation has now been resolved and the employee in question is no longer working additional overtime.

Item C

The mill management has been diligently conducting a series of briefings to inform and update the workers regarding break time and extended break time. These briefings serve as crucial opportunities for imparting essential information and ensuring that all employees are well-informed about the allocated break periods. The following is a list of briefings conducted by mill management based on the training records;

23.03.2022

25.07.2022

24.10.2022

29.01.2023

15.06.2023

10.07.2023

01.08.2023

Although extensive awareness was conducted, it does however appear as though the awareness may not have been effective. Therefore, to address this:

1. Standard awareness material has been developed and provided to the Mill Managers to use when conducting awareness; and
2. Poster created and socialised on all Mill noticeboards.

Item D

Malilimi Estate Worker

Since the employee was over-paid as a result of human error (input error), their pay will not be deducted. Refer to corrective action section for corrective action taken to prevent reoccurrence.

Garu Estate

Based on the retrieved sample's document during the audit assessment, it seems that there is a discrepancy between the estate's record and the auditor's finding. The authentic records for PPE#20230521 are listed below;

- Total bunches as per productivity records: 2037 bunches
- Total bunches as per pay slips: 2037 bunches
- Difference: 0

The worker's payment was accurate and consistent, in accordance with the productivity records' bunches.

Item E

The case has been reviewed and immediate action has been taken. The underpay of 2 days of injury leave / pay with total K 59.36, has been paid PPE 27.08.2023.

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	Reimbursement of the underpaid has been done during the PPE20230827 total K59.36
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Management is not fully aware of the terms and conditions of employment and also have not clearly communicated to workers of the T&Cs. Compensation unpaid for termination – superannuation for the employee was paid accurately however the payment in lieu (2 weeks) was not paid due to Manager not aware of this requirement. 2. Rest period – The mill has never stopped workers and awareness conducted, however awareness appears to have been ineffective due to no standard awareness document / template for the Manager to use when conducting the awareness. 3. OT exceeding limit – under certain circumstances including the case referred in the objective evidence is due to unavailability of competent personnel for specific tasks due to resignations or termination and overall shortage of manpower to cover shifts. The mill had allowed workers to work more than the permissible limit. 4. Inaccurate wage calculation due to human error.
Corrective Actions:	<ol style="list-style-type: none"> 1) Issue reminder on the requirements related to employee entitlements / compensation requirements relating to termination. 2) Disseminate the revised OT procedure and conduct briefing to management regarding OT & working hours. 3) To brief Managers on internal policies on employment contracts and terms – permanent and temporary; termination, working hours. 4) Fortnightly review and monitoring of PPE overtime reports and corrective action taken where required. 5) Established documented process (step by step, flow chart) regarding fortnightly pay input / processing and the checking mechanism to check accuracy. Communicate to all responsible parties & training done with all employees involved in pay input. 6) The management NBOP has established procedure for salary payment which included harvesting works documented in the “estate paycheck process flow chart” and “SOP Paycheck” version 01 issuance on September 2023 signed by head of plantations. Stated in the SOPs that productivity sheet will be updated by supervisor on daily basis and will be verified by the assistant manager, pay roll clerk and manager on fortnightly basis. 7) Conduct OT and working hours’ awareness to workers during morning musters and toolbox talks. 8) Sustainability Department to conduct monthly check of all LTI’s to ensure they have accurately paid. LTI Register to be matched against SAP payment data.
Assessment Conclusion:	<p>Item A</p> <ol style="list-style-type: none"> 1. Payment in lieu has been done for the workers base on remittance advice number 286878, total K326.48 and there is evidence that worker already collect the cheque base on photo provided and document signed. Interview

	<p>unable to be done since the worker are not staying in the compound anymore</p> <ol style="list-style-type: none"> 2. Memo sighted dated 14/09/2023 from Human resources manager to all OU`s manager related to payment of severance entitlements including payment of monies in lieu of notice. 3. Training records sighted for all the workers done by Julius Modbi on 02//10/2023. Sample taken for Bilomi Division, Malilimi Estate 4. Communication of the policy has been done by the Human resources manager, Mr Billy Madonen on 19/09/2023 to all operating units manager <p>Item B</p> <ol style="list-style-type: none"> 1. Overtime policy and governance has been established version 01 updated on October 2023 which clearly stated that overtime is voluntarily and not exceeds 48 hours as per PNG employment act. 2. Sample of pay slips taken for 5 PPE 20231008, 20230924, 20230910, 20230827 and 20230813 which there is evidence that there no workers works more than 48 hours. 3. Communication of the policy has been done by the Human resources manager, Mr Billy Madonen on 19/09/2023 to all operating units` manager, sighted also that the procedure has been posted at the notice board for easy access. 4. Communication of the overtime and resting period has been done several time after the audit and sighted that training has been done to all the workers by the operating units 16/10/2023, 11/10/2023 and 09/10/2023 <p>Item C</p> <ol style="list-style-type: none"> 1. Standard awareness material has been established and prepared by Head of milling, Mr Gopinathan which clearly mentioned the rest period at works. 2. Poster has been established and posted at the notice board at the office and workstation which can be easily access by all workers. 3. Communication of the overtime and resting period has been done several time after the audit and sighted that training has been done to all the workers by the operating units 16/10/2023, 11/10/2023 and 09/10/2023 <p>Item D</p> <ol style="list-style-type: none"> 1. The management NBOP has established procedure for salary payment which included harvesting works documented in the "estate paycheck process flow chart" and "SOP Paycheck" version 01 issuance on September 2023 signed by head of plantations. Stated in the SOPs that productivity sheet will be updated by supervisor on daily basis and will be verified by the assistant manager, pay roll clerk and manager on fortnightly basis. 2. Communication of the SOPs to all manager/ assistant manager sighted on 19/09/2023 done by the Plantation Head, Mohamed Nasir. Interview with assistant manager demonstrate their understanding on the SOPs
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	<p>3. Communication of the SOPs done by Garu Estate by assistant manager, MR Isidor Saeke JNR to all supervisors/paycheck clerk. While for Malilimi estate, communication of the SOPs done 12/10/2023</p> <p>4. Sample of document has been taken, E796-WNB-Garu Estate Rollover form PPECODE: 20230105-Section 108- division three-wheeler where check and verification has been done by the assistant manager on 18/09/2023, 21/09/2023 and 25/09/2023.</p> <p>Verification has been done comparing to summary of payslips print out by the SAP system which tally which actual bunch recorded by supervisor. There is evidence that both documents has been check and verified by assistant manager and estate manager</p> <p>5. Interview with the workers confirmed that the SOPs has been implemented and there is no issues regards to salary payment.</p> <p>Item E</p> <p>1. Reimbursement of the underpaid has been done during the salary payment PPE20230827 total K59.36 and it has been verified based on payslips.</p> <p>2. Monitoring by sustainability department of LTI has been conducted for month August and September 2023. All data provided by the operating units and will be counter check with the SAP system. If there any pending payment, sustainability department will notify the operating units to proceed the payment. Sighted sample for Haella Estate and Bebere Estate which payment has been done on 17/10/2023 through petty cash. It has verified based on petty cash voucher</p> <p>3. Training how to fill up the records for lost time injury has been taken documented Injury Assessment report” which has been trained to the CHW and payclerk on 11/10/2023</p> <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2376409-202308-M6	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	6.5.1 (Critical)		
Statement of Nonconformity:	The Domestic Violence Policy has not been adequately implemented.		
Requirement Reference:	A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.		

	<p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement.</p>
<p>Objective Evidence:</p>	<p>Internal policy for sexual and all other forms of harassment and violence sighted in "Domestic violence policy" dated 12/07/2023 which stated, while women who experience domestic violence, the policy applies equally to men who need advice and support. In the support of this, it is NBPOL policy that anyone who experiencing or has experience domestic violence can raise in the knowledge that NBPOL will resolve the issue of matter effect.</p> <p>A rape incident occurred within the Kumbango POM housing compound involving a minor (15 years old) and was perpetrated by her uncle on the 13th of August 2022. The victim's mother filed a complaint on the 19th of August 2022, and sought to verify whether the security had informed the management about the situation, which they had not.</p> <p>Although the matter was raised with the security department, there is no indication that any investigation has taken place. Additionally, the management has not provided any guidance or assistance to the victim, contrary to the commitment outlined in the policy.</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> 1. The Sustainability Department made contact with the victim and the victim's mother and arranged counselling sessions for the victim, providing them with the necessary moral encouragement. 2. The counselling session took place on 28.08.2023, in collaboration with various departments such as Sustainability, Women Empowering Women (WEW), Welfare, and Safety. The victim, along with her mother and other family members, were present during the session. Follow up counselling has been offered to the victim.
<p>Root Cause Analysis:</p>	<ol style="list-style-type: none"> 1. No established SOP / flowchart outlining the required steps and referral pathway in dealing with sexual harassment and abuse cases. Therefore, this particular incident was not handled / managed appropriately by the relevant departments. 2. No established SOP for Security Department relating to timely and effective investigation of sexual harassment and abuse cases.
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. IOM reminder issued to all Operating Units (OU's) on the 8th September regarding the requirement for rape and sexual assault cases to be immediately escalated to nominated Managers to ensure timely investigation and determination of disciplinary action. 2. Develop SOP that clearly outlines the required steps, referral pathways and various responsibilities in dealing with sexual harassment and abuse cases. This SOP will be a guide for all Managers and training / awareness conducted with all Managers to ensure that they are aware of the process and their responsibilities. 3. Security Department to develop an SOP relating to the timely and effective investigation of sexual harassment and abuse incidents. The SOP outlines the

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	<p>responsibilities of the Security Department and the various internal and external stakeholders (e.g. Police) that must be part of the process.</p> <ol style="list-style-type: none"> 4. All sexual harassment and abuse cases must also be reported to Sustainability Department. Sustainability Department to maintain a confidential register and conduct their own internal audit / checks of all incidents, ensuring effective implementation (as outlined in the above mentioned SOP's). 5. Standard awareness material on sexual harassment to be developed and circulated to all OU's. 6. Socialize awareness material to all OU Managers. 7. OU Manager's to conduct routine awareness with their workforce. 8. Posters relating to sexual abuse and assault to be developed and distributed across the operation to enhance awareness
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Consultation with the victim by women empowerment committee on 28/08/2023 and verified based on consultation minutes 2. Memo from the general manager for NBPOL- WNB, Mohamad Azhazha Abdul Aziz on handling raped cases, domestic violence and sexual assault on 07/09/2023 3. SOP for handling involving rape, sexual assault and domestic violence established on October 2023 rev 001 approved by Human Resources department. 4. SOP for handling cases volving rape, sexual assault and domestic violence for security department has been established in October 2023 5. Communication of the SOPs sighted done by Human Resources management and verify based on the training records 6. Posters has been established and posted at the notice board and accessible to all workers. <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>

Non-conformity			
NCR Ref #	2376409-202308-M7	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	6.7.1 (Critical)		
Statement of Nonconformity:	The evidence to show that the OSH Committee Meeting as frequent as stipulated in the NBPOL's Operational Safety Management Plan was not adequate.		
Requirement Reference:	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.		

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Objective Evidence:	For the year 2023, the evidence to show that Rigula Estate has been conducting their OSH Committee Meeting monthly as stipulated in the NBPOL’s Operational Safety Management Plan was not adequate. Only two meetings were conducted at the point of this assessment i.e., March and May 2023.
Corrections:	The July OSH Committee meeting for Rigula Estate was held on 11/08/2023 and August OSH Committee meeting held 28/08/2023. September OSH Committee meeting is scheduled for 28/09/2023.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Lack understanding and importance given to conducting OSH Committee by the Rigula Estate Management. 2. Lack of monitoring and tracking to ensure OSH Committee Meetings are conducted as required.
Corrective Actions:	<ol style="list-style-type: none"> 1. Issue IOM reminder to all WNB OU’s regarding the requirement for documented, effective, monthly OSH Committee meetings. 2. Copies of meeting minutes must be submitted to Sustainability by all OU’s each month for tracking on the adequacy of the issues discussed and frequency. 3. Refresher training to all Managers and Sustainability / ESH reps on the requirements stated on NBPOL OSMP with particular focus on OSH Committee meetings. 4. Sustainability Department to receive the 2023 meeting calendar from all OU’s and central planner maintained.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Minutes meetings has been sighted where it has been conducted on 26/09/2023 and 28/08/2023 attended by representative from employer and employees. 2. Memo from head of sustainability, Peter Callister and general manager, Mohamed Azhazha Abdul Aziz for NBPOL dated 05/09/2023 regards to monthly OSH committee meetings and personal protective equipment. 3. Sighted WNB OHS meeting tracker. For meeting conducted on 28/08/2023, it has been submitted on 04/09/2023 and for meeting conducted 26/09/2023, it has been submitted on 04/10/2023. 4. Evidence of email which the OSH minutes meeting has been submitted to sustainability department. 5. Meeting schedule for 2023 is available and documented in “Rigula Estate safety meeting schedule-2023”. Next meeting will be conducted on 26/10/2023, 30/11/2023 and 28/12/2023. 6. Training for manager/OSH representative has been done by sustainability department on 09/09/2023 and 12/09/2023 <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>

Non-conformity			
NCR Ref #	2376409-202308-M8	Issued Date	18/08/2023

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Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	Workers did not use appropriate personal protective equipment (PPE) as specified in Company procedures and sanitation facility was not used by a spraying worker.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, 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.		
Objective Evidence:	<ul style="list-style-type: none"> i) At Rigula Estate, Field No. MU RG 700, Road 5, Ave. 5, a worker was seen to be doing the FFB loading work barefooted. ii) There have been a few spots of small fire occurred at Field No. MU RG 500, Road 5, Ave. 4 to 5, Rigula Estate during the field visit. Six herbicides spraying operators were assigned to put out the fire. However, none of them were wearing appropriate PPE such as closed shoes and long pants while putting out the fire. This is not in-line with the Agricultural Fire Fighting Procedure (doc. no.: SUST-05). iii) There was a chemical spraying operation at Malilimi Estate (Field No. MN02C, Ave. 1) done by two workers. However, it was observed that one of the workers did not go to the sanitation facility to cleanse himself after work. 		
Corrections:	<p>Item A</p> <p>Safety boots have been distributed to the workers identified conducting FFB loading without boots. The estate management conducted a training session on 15/08/2023 to raise awareness among drivers and loaders.</p> <p>Item B</p> <p>A firefighting training session with full personal protective equipment (PPE) was carried out by the estate management team at Avenue 4,5 midpark on 12/08/2023. A total of 6 individual sprayers participated.</p> <p>Item C</p> <p>Estate management organized a training session on the proper usage of the sanitation facility for all sprayers on 30/08/2023 at Mililimi office.</p>		
Root Cause Analysis:	Lack of monitoring and enforcement of PPE by Management at Rigula and Malilimi Estates.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Issue IOM reminding all Managers to check and document workers PPE at musters every morning. No PPE, No Work policy MUST be enforced. 2. Training and awareness to be conducted with all managers' / sustainability reps & workers regarding the OSMF and PPE guidelines and requirements. 3. Sustainability to conduct ad hoc / unannounced periodic PPE checks covering all Estates. 		

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Assessment Conclusion:	<ol style="list-style-type: none"> 1. Training for manager/OSH representative has been done by sustainability department on 09/09/2023 and 12/09/2023 2. Memo from head of sustainability, Peter Callister and general manager, Mohamed Azhazha Abdul Aziz for NBPOL dated 05/09/2023 regards to monthly OSH committee meetings and personal protective equipment. 3. Sustainability to conduct adhoc / unannounced periodic PPE checks covering all Estates which records sighted and latest has been done on 09/10/2023 4. Daily PPE monitoring by the estate management during morning muster call and sighted in "Daily PPE checklist" for all types of works. 5. Training for sprayers sighted on 10/10/2023 on sanitation after job done. 6. Demonstration of the fire fighting team to put out the fire. 7. Interview with workers on PPE and issuance of PPE. <p>The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.</p>
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Non-conformity			
NCR Ref #	2376409-202308-N1	Issued Date	18/08/2023
Due Date	17/9/2023	Closure Date	Next assessment visit
Indicator & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	Review of SEIA (complete SEIA and Environmental Aspect Impact) was not made available and concluded with changes to current practices.		
Requirement Reference:	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. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every ten years to evaluate the cumulative effect of incremental changes. There shall be evidence that the review includes the participation of affected stakeholders.		
Objective Evidence:	<p>1) Numundo POM</p> <ol style="list-style-type: none"> a) NBPOL Environmental Aspect Register, issue: 13 dated July 2023 has yet to include changes to current practice for: b) EFB stockpile at ETP area – Operating state under abnormal and emergency has not been identified in the adverse environmental aspects list. Significant environmental impacts on the GHG emission (CH4) from anaerobic process and leachate generation was not evaluated. <p>2) SEIA was not made available for plantations and Waraston POM and updated at least every ten years.</p>		

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Corrections:	<ol style="list-style-type: none"> 1. Review Environmental Aspects and Impacts Register to ensure the stockpiling of EFB is captured as a negative impact with mitigation measures in place. 2. EFB Management Plan for NOM to be developed and implemented. 3. EFB stockpile to be removed and EFB spread to the field or moved used as composting site at the nursery. 4. Complete SEIA for WOM – currently underway with consultant scheduled to be onsite 18th September. 5. SEIA for WOM to be conducted September 2023 and SEIA for all Estates to be conducted Q1 2024.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Environmental Aspects Register failed to capture EFB stockpiling as it is not a standard practice within the company’s operations. 2. Insufficient planning, preparation and allocation of budget to ensure SEIA’s were completed
Corrective Actions:	Include SEIA for Estates into 2024 budget and SEIA for Estates conducted Q1 2024.
Assessment Conclusion:	The correction and corrective action plans are found to be adequate. Verification of implementation of the corrective actions shall be carried out in the next assessment visit.

Non-conformity			
NCR Ref #	2376409-202308-N2	Issued Date	18/08/2023
Due Date	17/9/2023	Closure Date	Next assessment visit
Indicator & Category (Critical / Minor)	4.2.3 (Minor)		
Statement of Nonconformity:	Complaint has not been resolved in timely manner		
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:	<u>Rigula Estate</u> One complaint was lodged to the management on 16/04/2023, about a case of death caused by delayed arrival of ambulance by 4 hours. The management explained that the ambulance was stationed at Kapiura and required long travelling time for responding to emergency situations. The management’s resolution involved reallocating ambulance A#427 back to Rigula Estate / Malilini Estate. However, at the point of this audit, no action has been taken, although the management had classified the issue as “resolved”.		
Corrections:	Ambulance has since been back to Rigula and permanently stationed there.		
Root Cause Analysis:	Lack of communication by Rigula Management and Kapiura Group Management with the Clinic on the status of the ambulance.		

Corrective Actions:	<ol style="list-style-type: none"> 1. Review of Ambulance SOP, stipulating that the Company Doctors and onsite HEO's have direct control of the ambulances. 2. Revised SOP to be socialized amongst all Clinic staff and all OU Managers.
Assessment Conclusion:	The correction and corrective action plans are found to be adequate. Verification of implementation of the corrective actions shall be carried out in the next assessment visit.

Non-conformity			
NCR Ref #	2376409-202308-N3	Issued Date	18/08/2023
Due Date	17/9/2023	Closure Date	Next assessment visit
Indicator & Category (Critical / Minor)	6.2.7 (Minor)		
Statement of Nonconformity:	Temporary workers have been used for core works.		
Requirement Reference:	Permanent, full-time employment is used for all core work performed by the unit of certification. Temporary, temporary and day labour is limited to jobs that are temporary or seasonal		
Objective Evidence:	<p>It was found that temporary workers were used for core works. Samples are as follows:</p> <p><u>Kumbango POM</u></p> <ol style="list-style-type: none"> 1. Worker AA, Recruited 23/01/2023, Kernel Station Operator 2. Worker BB, Recruited 23/01/2023, Oil Room Operator 3. Worker CC Recruited 23/01/2023, Effluent Pond <p><u>Kapiura POM</u></p> <ol style="list-style-type: none"> 1. Worker DD, Recruited 15/03/2023, Housing upkeep. 2. Worker EE, recruited 26/06/2023, Housing upkeep 		
Corrections:	<p>The 3 workers who were originally employed as temporary workers at Kumbango POM have been confirmed as permanent employees on 24.08.2023. As a result, these 3 individuals are now able to carry out the core work of the POM.</p> <p>However, in the case of the 2 sample workers for the Kapiura POM, their responsibilities are focused on housing upkeep, which is not considered as core work.</p>		
Root Cause Analysis:	Kumbango POM and Kapiura POM were not aware of this RSPO requirement due to lack of information being made available to them.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Estates and Mills to make a list of all core and non-core jobs. A procedure to be developed to as a guidance document for all Managers. 2. Awareness to be conducted with Managers regarding the procedure. 3. All Managers to conduct a review of all temporary employees and ensure that none are conducting core work. The review to also determine the status of workers and a permanent contract offered if the task falls under core work. 		

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Assessment Conclusion:	The correction and corrective action plans are found to be adequate. Verification of implementation of the corrective actions shall be carried out in the next assessment visit.
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Non-conformity			
NCR Ref #	2376409-202308-N4	Issued Date	18/08/2023
Due Date	17/9/2023	Closure Date	Next assessment visit
Indicator & Category (Critical / Minor)	6.7.2 (Minor)		
Statement of Nonconformity:	The assigned operative trained in first aid was not present in the field.		
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of 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:	The assigned operatives trained in first aid were not present during the visit of the following operations: i) harvesting at Garu Estate (field no. GR200, Ave. B) ii) manual weeding at Garu Estate (field no. GT0800, Ave. 2)		
Corrections:	All Supervisors and Section Leaders to be trained up as first aid operatives and provided with the field 'first aid bumbag'.		
Root Cause Analysis:	Insufficient number of trained first aid operatives at Garu Estate.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Review the adequacy of First Aid kits and First Aid officers at all Estates. 2. Conduct training with all designated First Aid officers. 3. Conduct briefing to all workers on the availability of first aid kit, location and PIC's. 		
Assessment Conclusion:	The correction and corrective action plans are found to be adequate. Verification of implementation of the corrective actions shall be carried out in the next assessment visit.		

Non-conformity			
NCR Ref #	2376409-202308-N5	Issued Date	18/08/2023
Due Date	17/9/2023	Closure Date	Next assessment visit
Indicator & Category (Critical / Minor)	6.7.4 (Minor)		
Statement of Nonconformity:	The status of whether or not the worker is eligible to get insurance compensation claim due to accident was undetermined.		
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 national law or by the unit of certification where national law does not offer protection.
Objective Evidence:	There had been an accident to a worker (Emp. ID 6XXXX1) at Numundo Oil Mill on 12/10/2021 (<i>but reported in the accident logbook 12/10/2022</i>). Based on the Injury Assessment Report (IAR), the company's clinic had classified the injury as Major and requires workers compensation. However, the IAR was not available at the company's Human Resource Department for further process. Thus, the status of whether or not the worker is eligible to get insurance compensation claim due to accident was undetermined.
Corrections:	Worker's compensation payment relating to this injury to be processed.
Root Cause Analysis:	Management lack of understanding of the injury reporting procedure and the requirement to submit documentation for processing of Worker's Compensation
Corrective Actions:	<ol style="list-style-type: none"> 1. Amend EOM reporting template and KPI Reporting template to include a column for worker's compensation check. 2. Conduct refresher training with all Managers on the injury reporting procedure and flowchart. 3. On a monthly basis, Sustainability to cross-check on reported cases entitled for worker's compensation and ensure accurate and timely processing.
Assessment Conclusion:	The correction and corrective action plans are found to be adequate. Verification of implementation of the corrective actions shall be carried out in the next assessment visit.

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>2376409-202308-I1</p> <p><u>Indicator 6.2.4</u></p> <p>Management plan to construct new housing to replace substandard housing and overcrowding quarters established in 15/03/2023 which 1,655 of workers housing with total PGK 374.98M has been allocated for period of 10 years.</p> <p>OFI raised for auditor to verify implementation on the next audit.</p>

Positive Findings	
PF #	Description
PF 1	Good cooperation by management team/staff/sustainability team
PF 2	Good documentation upkeep and retrieval
PF 3	Good housekeeping at most workplaces e.g., workshop, storage, mill operation areas, etc.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity																				
NCR Ref #	2232929-202207-M1	Issued Date	05/08/2022																	
Due Date	01/11/2022	Closure Date	01/11/2022																	
Indicator & Category (Critical / Minor)	6.2.4 Critical (Major)																			
Statement of Nonconformity:	Housing repair still pending for nearly 1 year after complaint received.																			
Requirement Reference:	The Company 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. Smallholders may live in houses of traditional materials or other accommodation of their choosing.																			
Objective Evidence:	<p>Quarterly housing compound inspection done using PF#29 title "Housing repair and maintenance checklist" and base on inspection done, it has been identified that there several item which has been classified under NR, need for repair (leaking roof, full septic, electrical faults and floor damage) and yet to be done since 2021. Interview respond with the workers and site visit confirm that it is consistent with the document reviewed.</p> <p>2 samples of site have been taken as per below:</p> <p><u>Kapiura POM</u></p> <p>Line site inspection has been done on quarterly basis, (07/07/2022, 22/05/2022, 1703/2022 and 14/12/2021).</p> <table border="1"> <thead> <tr> <th>House number</th> <th>Item need to be repaired</th> <th>Application for repair</th> <th>Pending since</th> </tr> </thead> <tbody> <tr> <td>JG01 and JG02</td> <td>roofing, gutter, toilet, wall, veranda, pipe</td> <td>14/06/2022.</td> <td>July 2021</td> </tr> </tbody> </table> <p><u>Numundo POM</u></p> <p>Sample has been taken for house DLQ3/A and QLQ 1 and both has been identified as need for repair from the previous inspection which is June 2021 and still pending for repair until the day of audit.</p> <table border="1"> <thead> <tr> <th>House number</th> <th>Date inspection</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>DLQ1/AB</td> <td>20/06/2021 08/05/2022</td> <td>a) Broken gutter</td> </tr> <tr> <td>DLQ3/A</td> <td>20/06/2021 08/05/2022</td> <td>a) Roof leaking b) Broken window frame</td> </tr> </tbody> </table>			House number	Item need to be repaired	Application for repair	Pending since	JG01 and JG02	roofing, gutter, toilet, wall, veranda, pipe	14/06/2022.	July 2021	House number	Date inspection	Remarks	DLQ1/AB	20/06/2021 08/05/2022	a) Broken gutter	DLQ3/A	20/06/2021 08/05/2022	a) Roof leaking b) Broken window frame
House number	Item need to be repaired	Application for repair	Pending since																	
JG01 and JG02	roofing, gutter, toilet, wall, veranda, pipe	14/06/2022.	July 2021																	
House number	Date inspection	Remarks																		
DLQ1/AB	20/06/2021 08/05/2022	a) Broken gutter																		
DLQ3/A	20/06/2021 08/05/2022	a) Roof leaking b) Broken window frame																		

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	QLQ1	12/02/2022	a) Sink outlet discharge leaking b) Toilet system leaking
Corrections:	Quarterly housing inspection and register to be in place, follow up to be done monthly by Manager and appointed representative to reconfirm with physical inspection and update register status of notification raised and progress.		
Root Cause Analysis:	Follow up not done with construction on the notification raised for repairs by appointed personnel at both Mills so that costings and major R&M can be raised and approved by Management for work to be carried out.		
Corrective Actions:	Close monitoring of quarterly housing inspection to be done by appointed representative and reconfirmed by Department Manager through the monthly OHS Inspection and findings to be discussed in the OHS Meetings and captured in the minutes. Internal quarterly audits check to ensure issues identified are closed out as per given time frame.		
Assessment Conclusion:	<p>Document received</p> <p>a) Quarterly housing inspection records with reconfirm with physical inspection and update register status of notification raised and progress.</p> <p>b) Appointment letter for PIC for each operating units and issues discuss during monthly OHS Inspection</p> <p>Based on the evidence provided, it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 01/11/2022</p>		
Effectiveness Closure (for previous audit closed Critical NC)	As per verification during site visit, there is evidence that all repair report has been attended by the management. Any repair request will be requested through PF#29 and will be requested to construction department. Sample of repair request has been taken for month January'23, March'23 and May'23. All repair request has been responded and notify the construction department. Most of the repair has been done. Person in charge has been appointed for each operating units and based on interview, they can demonstrate their understanding on the process of handling the repair issues.		

Non-conformity			
NCR Ref #	2232929-202207-M2	Issued Date	05/08/2022
Due Date	01/11/2022	Closure Date	01/11/2022
Indicator & Category (Critical / Minor)	7.12.4 Critical (Major)		
Statement of Nonconformity:	It was identified that the management of conservation areas (Buffer Zones) were not fully implemented as below:		
Requirement Reference:	Where HCVs, HCS forests after 15 November 2018, peat land and other conservation areas within Company managed land 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.		

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Objective Evidence:	<p>It was identified that the management of conservation areas (Buffer Zones) were not fully implemented as below:</p> <p><u>Togulo Plantation</u></p> <ul style="list-style-type: none"> • During the site visit along Dagi River and Ru Creek, it was noticed that there were no established buffer zones at certain portions of the river and creek banks. A "No Spray" zone has been established by the management but there were traces of spraying applications being done beyond the designated zone right to the river and creek banks. • Verified the HCV Checklist does not include the monitoring of "loss of riparian vegetation due to agricultural activity" as required under the Habitat Management Plans for buffer zones. <p><u>Numundo Plantation</u></p> <ul style="list-style-type: none"> • During the site visit along Wandora Creek, it was noticed that there were no established buffer zones at certain portions of the riverside due to the riverbanks being eroded over time. There were traces of spraying activities done at the palms that were along the creek banks as well. • As per the Habitat Management Plan, it states that Quarterly Buffer Zones monitoring should be done. Verified the HCV monitoring checklist where buffer zone monitoring was done only annually. <p>Verified the HCV Checklist does not include the monitoring of "loss of riparian vegetation due to agricultural activity" as required under the Habitat Management Plans for buffer zones.</p>
Corrections:	Demarcation to be done in both areas of Numundo and Togulo Plantation. Close monitoring of field activities by Supervisors and Managers.
Root Cause Analysis:	Initial demarcation was there however due to flooding overtime the bank eroded. Lack of supervision in the area to identify the activity as well as demarcation.
Corrective Actions:	Rehabilitation of the buffer areas Review Buffer Inspection checklist to include identifying other agriculture activities within the operational areas.
Assessment Conclusion:	<p>Documents received:</p> <ol style="list-style-type: none"> Photo of clear demarcation of buffer zone for Numundo and Togulo Plantation Checklist of monitoring for buffer zone inspection <p>Based on the evidence provided and it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 01/11/2022</p>
Effectiveness Closure (for previous audit closed Critical NC)	<p>Quarterly buffer zone inspection was carried out as per schedule. Related remarks will be recorded in the checklist if there is any illegal operation or other agriculture activities within the operational areas sighted during visit. Based on site verification, there was no encroachment or illegal activities sighted. Records of inspection (quarterly) were verified as per the following:</p> <ul style="list-style-type: none"> - Garu Plantation: 16/3/23, 12/05/23 - Malilimi Plantation: 14/3/23, 20/06/23 - Tamare Plantation: 22/3/23, 9/06/23 - Kumbango Plantation: 17/2/23, 16/05/23 <p>No recurrence of issue observed thus the previous major NC is remain closed.</p>

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Non-conformity			
NCR Ref #	2232929-202207-M3	Issued Date	05/08/2022
Due Date	01/11/2022	Closure Date	01/11/2022
Indicator & Category (Critical / Minor)	7.3.1 Critical (Major)		
Statement of Nonconformity:	There were lapses in the implementation of the Waste Management Plan.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	<p>There were lapses in the implementation of the Waste Management Plan.</p> <p><u>Mosa Oil Mill</u></p> <p>The SOP NBPOL; Mosa Mill; EFB Disposal from Mill; SOP No: MOM21; Issue Date: 20/06/2022. States: Environment; Spillage from EFB leakages if any, must be diverted to the sludge pit. During the verification done at the EFB Yard at Mosa Oil Mill, it was sighted that there were leachates discharged into the monsoon/storm drain.</p> <p>Due to this being a reoccurrence of non-conformity under the same indicator, a critical non-conformity has been raised.</p>		
Corrections:	<p>Engaging contractors to clear out EFB daily to reduce stock piling with ongoing monitoring by Mill Managers / Assistant Managers.</p> <p>Daily / Weekly checks on all triple interceptor with checklist updated.</p>		
Root Cause Analysis:	<p>No proper housekeeping supervision to prevent EFB leachate over and next to the drain.</p> <p>Incomplete project which was still work in progress at the time of the audit, due to delay of shipment pump and complete pipe not arriving in time for work to be completed</p>		
Corrective Actions:	<p>Leachate from the EFB diverted to mill sludge pit and discharged into the mill effluent pond.</p> <p>Place cover over storm water drain on section next to EFB piling</p>		
Assessment Conclusion:	<p>Document received:</p> <ol style="list-style-type: none"> 1) Engagement letter for contractor to clear out daily EFB 2) Checklist of monitoring 3) Photo o cover has been place at storm drain. <p>Based on the evidence provided, it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 01/11/2022</p>		
Effectiveness Closure (for previous audit closed Critical NC)	<p>Based on site verification at Mosa POM, the leachate pump system has been constructed to channel and pump to mill sludge pit. The system was tested and fully functional to contain and evacuate any leachate coming from EFB yard. No recurrence of issue observed thus the previous major NC is remain closed.</p>		

Non-conformity			
NCR Ref #	2232929-202207-N1	Issued Date	05/08/2022
Due Date	18/08/2023	Closure Date	18/08/2023
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Waste has not been disposed according to SOPs and waste management plan.		
Requirement Reference:	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators.</p> <p>Guidance: With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and compostable waste. Company procedures must state how these waste streams are managed.</p> <p>Smallholder requirements:</p> <p>The requirements fully applicable to smallholders.</p>		
Objective Evidence:	<p><u>Numundo Oil Mill & Heilla Plantation</u></p> <ol style="list-style-type: none"> 1) Referred to NBPOL SOP Waste Segregation & Disposal; SOP Number: SusMill 6; Issue No: 01; Issue Date: 16/10/2014; Procedure: NBPOL segregates its rubbish into three main categories – organic, Hydrocarbons & Domestic. During the visit to the landfill, it was noticed that the rubbish were not segregated as the organic and domestic rubbish were disposed together in the domestic rubbish pits. Furthermore, it was noticed that there were traces of burning on the rubbish. The rubbish was seen spilling out of the pit with no prompt cleaning up being done. 2) Referred to NBPOL SOP Hydrocarbon Waste and Disposal; SOP No: SusMill 9; Issue: 01; Issue Date: 16/10/2014; Procedure: Dispose of the container and hydrocarbons in the designated hydrocarbon pit. It was noticed in the EFB disposed in the fields that there were hydrocarbons waste also being disposed together such as Ropes and Contaminated Gloves. 3) Referred to NBPOL SOP EFB Disposal; SOP No: SusMill 4; Issue:01; Issue Date: 16/10/2014; Procedure: Plantations should endeavour to remove all EFB from mill sites in a timely manner. It was noticed that there were excess of EFB which have been stored all around the mill complex, contributing to other issues such as: <ul style="list-style-type: none"> • Seen heaps of EFB burning outside the mill complex and in the plantation. • Seen EFB heaps collapsed into the monsoon drain, contributing to leachate in the monsoon drain. <p>The hydrocarbon rubbish pit (Workshop – Garage Waste) was seen to have scrap metals disposed in them. There were fires seen in the pit as well.</p>		
Corrections:	<ul style="list-style-type: none"> • Designated personnel appointed at landfill site to maintain upkeep and monitor. • Awareness carried out with all employees, dependents and surrounding communities on zero burning. • Awareness with workers and dependents on proper waste segregation at each household. 		
Root Cause Analysis:	<ul style="list-style-type: none"> • Lack of awareness on waste segregation with employees and dependents by specific department Managers and no designated upkeep worker to maintain landfill site. 		

	<ul style="list-style-type: none"> Waste register not being maintained and updated Lack of awareness with workers, dependents and surrounding communities on zero burning and process of identifying and reporting. No proper housekeeping supervision to prevent EFB leachate over and next to the drain.
Corrective Actions:	<ul style="list-style-type: none"> Engaging contractors to clear out EFB daily to reduce stock piling with ongoing monitoring by Mill Managers / Assistant Managers. Ongoing social awareness with employees, dependents and surrounding communities on zero burning. Place cover over storm water drain on section next to EFB piling
Assessment Conclusion:	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit</p>
Effectiveness Closure (for previous audit closed Minor NC)	<p>EFB has been continuously cleared based on verification at all NBPOL POM. Minimum stock maintained in the mill and continuously evacuated to nearby NBPOL plantations. Continuous awareness was given to employees, dependents and surrounding communities on zero burning. For example at Rigula Plantation, training/briefing on waste management was carried out on 2/8/23. No recurrence of issue observed thus the previous minor was closed on 18/8/2023.</p>

Non-conformity			
NCR Ref #	2232929-202207-N2	Issued Date	05/08/2022
Due Date	18/08/2023	Closure Date	Escalated to Critical See 2376409-202308-M1
Indicator & Category (Critical / Minor)	1.2.1 (Minor)		
Statement of Nonconformity:	Policy for ethical conduct has not been fully implemented.		
Requirement Reference:	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others.		
Objective Evidence:	<p>As per interview with the smallholder it found out that deduction made for fertilizer request is not as per stated in the consent form signed by smallholder and smallholder department (SHA). Details as per below:</p> <ul style="list-style-type: none"> Consent letter dated 15/12/2021, signed by OPIC 17/12/2021, signed by SHA, 17/01/2022 stated fertilizer price PGK111.10/bag, PGK611.05/5 bags. Quotation form reference#002-0446, total PGK175.50/bag, PGK965.25/5 bags Deduction made: As per quotation (PGK965.25/5 bags) 		

<p>Corrections:</p>	<ul style="list-style-type: none"> • Procurement to updated SHA / Plantation on monthly basis on new pricing for Agrochemical stock items. • SHA to communicate new pricing to growers during weekly field day awareness. <p>Accounts Department to send out fortnightly list to SHA highlighting balance of debt after growers pay is processed. SHA to keep electronic tracker and update OPIC. OPIC to inform growers so that growers are kept up to date on the progress of repayment.</p>
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • Sudden change of fertilizer pricing. <p>Concept form signed by grower, while waiting for fertilizer stock, the price market rose, and the new price change was not communicated by Procurement Department to SHA for SHA (Smallholders Association Department) to carry out awareness to the growers on price change.</p>
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> • SHA HOD to have access to basic agro chemical item price to enable to keep constant track on new pricing to communicate and update the growers. • Procurement and Finance Department to come up with SOP or flowchart to address and capture process of communicating price fluctuation for fertilizer and fertilizer delivery. <p>Review of growers’ consent form to include section for advising growers of the sudden price change that can occur for deduction.</p>
<p>Assessment Conclusion:</p>	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit</p>
<p>Effectiveness Closure (for previous audit closed Minor NC)</p>	<ol style="list-style-type: none"> 1. SHA communicates new pricing to growers during weekly field day awareness and trainings that are conducted. The monthly updated price listing is also displayed at the Smallholder Department Notice Boards. The information also is posted in the WhatsApp Group which includes OPIC who in return disseminates the information to the growers. Nevertheless, the deduction is made based on the current fertiliser price and not on the price for the month the fertiliser is taken. 2. SHA HOD are updated by Procurement on the basic agrochemical, tools, and fertiliser prices. These pricing are communicated and updated to the growers on a regular basis. 3. Nevertheless, the implementation of the rest of the correction and corrective action plans to address the previously raised minor non-conformity was inadequate. <p><u>Correction Statement</u></p> <p>Accounts Department to send out fortnightly list to SHA highlighting balance of debt after growers pay is processed. SHA to keep electronic tracker and update OPIC. OPIC to inform growers so that growers are kept up to date on the progress of repayment.</p>

	<ul style="list-style-type: none"> - Based on the verification done, it was confirmed that the list highlighting the balance of debt after growers pay is processed was not sent out to SHA on a fortnightly basis. Latest email correspondence was acknowledged to be dated February 2023. <p><u>Corrective Action Statement</u></p> <p>Procurement and Finance Department to come up with SOP or flowchart to address and capture process of communicating price fluctuation for fertilizer and fertilizer delivery.</p> <ul style="list-style-type: none"> - There were no evidence of established SOP or Flowchart to address and capture the process of communicating price fluctuation for fertiliser and fertiliser deliveries. <p>Review of growers’ consent form to include section for advising growers of the sudden price change that can occur for deduction.</p> <ul style="list-style-type: none"> - There was no evidence of reviewed consent form being used for fertiliser deduction. The consent form being used did not include section advising growers of the sudden price change. <p>Due to the implementation of the CAP for previously identified minor non-conformity being unable to be closed and this being a reoccurrence of the same issue as previous minor nonconformity (Refer indicator 1.2.1 in Appendix A), it is escalated to critical non-conformity.</p>
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Non-conformity			
NCR Ref #	2232929-202207-N3	Issued Date	05/08/2022
Due Date	18/08/2023	Closure Date	18/08/2023
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	Inconsistent implementation of the SOPs		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place. Smallholder requirements: Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.		
Objective Evidence:	<p>1) Standard Operating Procedures- Discrepancy and grievances dated 21/05/2022 stated that “The driver, operator and crew must ensure that the grower is the rightful owner to the block by checking his block E-tag and grower I.D card” and “The driver, operator, crew and the block owner are not allowed to accept E-tags for crop shifting at any other block locations” However, it is found out that crop shifting has been practices for smallholder base on crop production records where some of the smallholder did not have FFB records and some of the smallholder has illogical FFB production (more than 50mt). It has been further confirmed during the interview with smallholder that there is some smallholder that using other smallholder E-tag due to few reasons (still did not register for E-tag, E-tag damage, family issues).</p> <p>2) Internal procedure title “Services management guidelines, compound upkeep practices (NBPOL-EI-MG14) stated in the procedure that line site inspection</p>		

	<p>need to be done quarterly basis using PF#29 document title "Housing repair and maintenance checklist"</p> <p><u>Kumbango POM</u> The management miss out 1st quarter line site inspection Latest housing inspection done is 14/07/2022 and identified houses which required for some repair. Sample taken house number IB#03, IB#06 and IB#12.</p> <p><u>Numundo POM</u> For year 2021 and 2022, line site inspection only been done once which is on 20/06/2021 and 08/05/2022 for DLQ unit. Occupational Safety Management Plan (OSMP) Appendix 7: PPE Guidelines form operational Safety Management Plan (May 2019) stated "company must provide gumboot, cap, overall, apron and nitrile glove. However, during site verification with PPE issuance" and site verification with interview with sprayer found no apron been issue and apply for Haella estate, Togulo estate and Daliavu estate. The issuance record sighted as per below sample:</p> <p><u>Haella Estate</u> Safety glass Apron Coverall Nitrile glove Boot Issuance date: 18/7/22,30/5/22, 30/5/22, 9/6/22</p> <p><u>Daliavu Estate</u> Safety glass Apron Coverall Nitrile glove Boot Issuance date: 5/5/2022 ,7/1/2022 ,7/1/2022</p> <p><u>Numundo Estate</u> Safety glass Apron Coverall Nitrile glove Boot Issuance date: 25/7/2022 ,14/6/2022, 14/6/2022, 22/7/2022</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> • SHA to communicate with IT to include in system and issue e-tag to blocks without e-tag. SHA to monitor and carry out awareness during filed days on grievance mechanism for smallholders to raise concerns through this channel so that feedback on issues of e-tags or others can be looked into and dealt with and closer monitoring of daily production report with daily reconfirming and updates from filed supervisors. • Site Manager not checking on the PF29 housing inspection schedule and OHS Meeting agenda not followed through to discuss and minute status of housing inspection when covering this topic. • Issue PPE as per the Operational Safety Management Plan for approved PPE issue
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • E-Tag issue not reported to SHA and no proper awareness to growers on the process of requesting for e-tags and crop shifting. • Housing inspection schedule not done and no thorough inspection of records covered during internal audit to identify the missing gap. • Morning musters PPE check not carried out by Estate Assistant Managers and Supervisors to identify the lack of PPE for orders to be placed with central stores.
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> • Process flow chart for requesting and verification of E-TAG to be in place and include as part of the checks during field and internal inspection. • Daily PPE muster checklist form to be done up. Assistant Managers to use during morning musters.

	PF29 housing inspection schedule to be done up and Manager / Engineer to monitor that inspection are conducted through the OHS Department Meetings and safety inspection.
Assessment Conclusion:	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit</p>
Effectiveness Closure (for previous audit closed Minor NC)	<ol style="list-style-type: none"> 1. The SHA have established a Process Flow Chart for Requesting and Verification of E-TAG which was available for verification. This the process flow has been also included in the internal audits as part of the monitoring to ensure the process is accurately adhered. 2. The internal audit also conducts inspection on the FFB Trucks to monitor on the truck driver's compliance to ensure FFB are only taken from the rightful owners of the E-TAGS. Records of inspection were available for verification. 3. The SHA have maintained a record of SH without E-TAGS and are during issuing the E-TAGS to them. Evidence of E-TAGS that were issued for the year were also available for verification. 4. Interview with the sampled SH confirmed that they have been provided awareness during Field Days that they are to only use the E-TAGS issued to them to supply their FFBs. In case of faulty or misplaced E-TAGS, they are to immediately inform the SHA for a replacement. <p>Based on the evidence obtained, the minor non-conformity was effectively closed on 18/08/2023.</p>

Non-conformity			
NCR Ref #	2232929-202207-N4	Issued Date	05/08/2022
Due Date	18/08/2023	Closure Date	18/08/2023
Indicator & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Independent Estate who supply to NBPOL-WNB POM did not pay as per minimum wages		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>Sample of 5 workers of has been taken from independent estate, Ngatia Estate and found out that the workers has not been paid as per Papua New Guinea Minimum Wages (PGK3.50/hour)</p> <p>Details as per below:</p>		

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	<p>Workers A</p> <p>Employment contract: PGK150, 76hours@ PGK1.97/hour, Paid: PGK140, 76hours@ PGK1.84/hour Minimum wages: PGK266, 76 hours@ PGK3.50/hour</p> <p>Worker B</p> <p>Employment contract: PGK150, 76hours@ PGK1.97/hour, Paid: PGK120, 76hours@ PGK1.58/hour Minimum wages: PGK266, 76 hours@ PGK3.50/hour</p>
Corrections:	<ul style="list-style-type: none"> • Workers to be issued contracts and paid as per minimum wage. • workers contracts revised and updated with monitoring of this to be done by SHA during internal audits.
Root Cause Analysis:	<ul style="list-style-type: none"> • No proper supervision • No proper employee records
Corrective Actions:	SHA Audit checklist to be reviewed.
Assessment Conclusion:	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit</p>
Effectiveness Closure (for previous audit closed Minor NC)	<ol style="list-style-type: none"> 1. Contract Agreements have been issued out to independent estate workers. Sampled the contract agreement for workers at Mora Estate, Akami Estate and Kumali Estate. The contract agreement has detailed out the payment details and is in accordance with the minimum wages. Payment records were sampled and found to be in accordance with the minimum wages and contract agreement. 2. Internal audits were conducted by the Smallholder Department on an annual basis. Sampled the Internal Audits Reports conducted for independent estates conducted as below. <ul style="list-style-type: none"> - Akami Estate: 20/03/2023 - Kumali Estate: 17/05/2023 - Mora Mora Estate: 25/07/2023 - Joe Revis: 04/07/2023 - Kauong Development Corp.: 06/07/2023 3) The audit checklist currently used the RSPO P&C requirements which included the requirement to comply with all legal requirements including the wages. <p>Based on the evidence obtained, the minor non-conformity was effectively closed on 18/08/2023.</p>
Opportunity for Improvement	

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OFI#	Description
OFI 1	<p>OFI Statement: 2232929-202207-I1</p> <p><u>Indicator 6.2.2</u></p> <p>NBPOL-WNB has established management plan for pending employment contract for workers that has been documented in document title "OUTSTANDING CONTRACT SUMMARY PLAN" which expected to be completed on 31/12/2022. OFI raised to ensure that the management plan implemented for next surveillance audit.</p> <p>Verification / Follow-up actions:</p> <p>As per verification, there is evidence that all employees have been provided with employment contract which has been issued by the human resources department. It has been further confirmed through interview with sample workers which they have signed the employment contract.</p>
OFI 2	<p>OFI Statement: 2232929-202207-I2</p> <p><u>Indicator 3.3.1</u></p> <p>The usage of E-SHEQ001 Incident Form, ver. 2, rev. 05/2014 could be further improved to detail out the types of incidents that should be reported under the environmental incidents.</p> <p>Verification / Follow-up actions:</p> <p>NBPOL WNB is currently using the SHEQ001 Incident Form, ver. 3, rev. 06/2015 which has the "Environmental Incident" as one of the incident categories. Other categories include the following:</p> <ul style="list-style-type: none"> • Incident involving injury or safety • Incident involving damage or loss of properties • Incident that almost happened (near miss) • Internal inquiry, grievance, or complaint • External inquiry, grievance, or complaint

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2232929-202207-M1	Major (Critical)	6.2.4	04/08/2022	Closed on 01/11/2022
2232929-202207-M2	Major (Critical)	7.12.4	04/08/2022	Closed on 01/11/2022
2232929-202207-M3	Major (Critical)	7.3.1	04/08/2022	Closed on 01/11/2022
2232929-202207-N1	Minor	7.3.2	04/08/2022	Closed on 18/08/2023
2232929-202207-N2	Minor	1.2.1	04/08/2022	Escalated to Critical
2232929-202207-N3	Minor	3.3.2	04/08/2022	Closed on 18/08/2023
2232929-202207-N4	Minor	2.2.2	04/08/2022	Closed on 18/08/2023
2376409-202308-M1	Major (Critical)	1.2.1	18/08/2023	Closed on 17/10/2023
2376409-202308-M2	Major (Critical)	3.4.3	18/08/2023	Closed on 17/10/2023
2376409-202308-M3	Major (Critical)	3.8.6	18/08/2023	Closed on 17/10/2023
2376409-202308-M4	Major (Critical)	4.1.1	18/08/2023	Closed on 17/10/2023
2376409-202308-M5	Major (Critical)	6.2.3	18/08/2023	Closed on 17/10/2023
2376409-202308-M6	Major (Critical)	6.5.1	18/08/2023	Closed on 17/10/2023
2376409-202308-M7	Major (Critical)	6.7.1	18/08/2023	Closed on 17/10/2023
2376409-202308-M8	Major (Critical)	6.7.3	18/08/2023	Closed on 17/10/2023
2376409-202308-N1	Minor	3.4.2	18/08/2023	Open
2376409-202308-N2	Minor	4.2.3	18/08/2023	Open
2376409-202308-N3	Minor	6.2.7	18/08/2023	Open
2376409-202308-N4	Minor	6.7.2	18/08/2023	Open
2376409-202308-N5	Minor	6.7.4	18/08/2023	Open

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3.4 Stakeholders and previous landowner / 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 Mosa POM, Kumbango POM, Waraston POM, Kapiura POM and Numundo POM 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		
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)
Contractor	KBSA Hardware	Face to face
NGO	Mama Loose Fruit Scheme	Face to face
Contractor	Guard Dog Security Services	Face to face
NGO	UNDP	Face to face
Internal	Female workers	Face to face
Contractor	Grocery store	Face to face

Stakeholders' comments	
1	<p>Feedbacks: KBSA Hardware</p> <p>KBSA hardware has supplying hardware material more than 20 years and will provide material base on purchase order received. He said any order will be based on quotation and will be verified by procurement department. There is no issues for payment which payment will be made by the management in 30 days' notice. Good relationships have been maintained between both parties and he always been invited for consultations.</p> <p>Audit Team verification and response: No further verification required.</p>
2	<p>Feedbacks: Mama Loose Fruit Scheme</p> <p>Mama Loose Fruits scheme has been established to ensure that all female or wife of the smallholders gained income from the operations of the oil palm planting. The chairlady explained the scheme initiated by NBPOL and has been properly managed effectively. The systems allowed all women to collect loose fruits and the payment will directly be debited in the wives' bank account. There is no issues discrimination to any female has been practices by NBPOL. She mentioned that all females are delighted with the scheme established. Any issues will be directly informed to the management of NBPO either human resource department or smallholders department.</p>

	Audit Team verification and response: No further verification required.
3	<p>Feedbacks: Guard dog security system</p> <p>Guard dog security services is external contractor that has been appointed by NBPOL to ensure harmonious and safety condition in the NBPOL compound. As far as the day of audit, criminal cases happen in the area mainly on robbery, drugs, sexual harassment. He mentioned that any issues/cases that happen in the NBPOL compound will be liaise to security department. Good relationships have been maintained between both parties and he always been invited for consultations.</p> <p>Audit Team verification and response: No further verification required.</p>
4	<p>Feedbacks: United Nation Development Program (UNDP)</p> <p>UNDP has developed program to protect marine wildlife in Papua New Guinea and focusing on New Britain Island which there are more 50% of marine life from total of the species. Their roles also to give awareness to company, community and individual. So far, there is no program has been conducted with cooperations NBPOL and they are positive to conduct once and still in the planning phase.</p> <p>Audit Team verification and response: No further verification required.</p>
5	<p>Feedbacks: Grocery store</p> <p>Site visit to grocery store has been done by auditor. Grocery store has been established by the management as part of initiative to ensure access for reasonable price of foods and grocery. As per interview, the management monitor the pricing on monthly basis with total 15% profits for the item prices. Good relationships have been maintained between both parties and he always been invited for consultations.</p> <p>Audit Team verification and response: No further verification required.</p>
6	<p>Feedbacks: Female workers</p> <p>Most of the female workers in all operating units as loose fruits picker and general workers. There is no discrimination cases happen where all of them has been treated equally by the management. As per interview, they can demonstrate their understanding on complaint procedure for any cases of sexual harassment. They did not aware if there any sexual harassment cases had happen in their estate/POM compound.</p> <p>Audit Team verification and response: No further verification required.</p>

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List of landowner / 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
N/A					
It is deemed that there is no previous land user / owner as the company has planted the second generation of oil palms. NBPOL-WNB has been in operations since 1960s.					

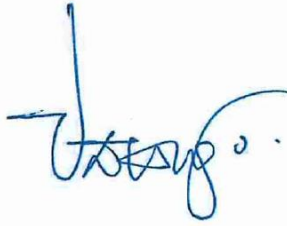

Previous landowner / user comment	
	Feedbacks: N/A
	Audit Team verification and response: N/A

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 Mosa POM, Kumbango POM, Waraston POM, Kapiura POM and Nomundo POM and Supply Base has complied with the PNG & Solomon Islands 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 Mosa POM, Kumbango POM, Waraston POM, Kapiura POM and Nomundo POM and Supply Base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Valence Shem	Name: Zaralyn - Yakopa
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: New Britain Palm Oil Ltd
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 06/11/2023	Date: 6/11/23

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> <p>Smallholder Requirement: Organization that is managing the smallholders shall hold relevant documents and make available to interested parties on request.</p> <p>- Critical (Major) compliance -</p>	<p>Document that publicly available has been listed but not limited to as per below.</p> <ol style="list-style-type: none"> 1. Land title 2. Occupational health and safety plans 3. Details of complaint and grievances 4. Pollution preventions and reduction plans 5. Waste management plan 6. HCV documentation <p>Other than that, NBPOL-WNB published their document in the websites www.nbpol.com such as policies and procedure, sustainability structure, sustainability reports, certification and indices, stakeholders' consultations and NBPOL foundation.</p> <p><u>Smallholders</u> Documents that are made publicly available by NBPOL via office documentation and website documentation (www.nbpol.com) are accessible and available for the smallholders. Upon request the smallholders can obtain the documents at the Smallholder's Department. Interview with the sampled smallholders concluded that they are aware that they can obtain information on documents at the SHA department.</p>	Complied

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1.1.2	<p>Documented Information is provided in English and accessible to relevant stakeholders. Explanatory information may be provided in writing or orally in Tok Pisin (PNG) or SI Pijin (Solomon Islands)</p> <p>- Minor compliance -</p>	<p>All document has been established in English and accessible to all stakeholders which can be requested through communication and consultation procedure and approval by head of department. Since the last assessment, there has been no request from any stakeholders.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>All information requests will be recorded in the logbook title stakeholders' registers. Most of the request that has been received is related to assistance. Sample has been taken for 2 operating units and details as per below:</p> <p><u>Tamare Estate</u></p> <p>There is no information request has been received by the management of Tamare Estate where the management only request of assistance. There is evidence that all request has been respond by the management base on the records and interview with the workers. Details as per below</p> <ol style="list-style-type: none"> a. Seventh days Aventis church requested for petrol and diesel for their operations dated 27/07/2023. b. Local at Atex community requested petrol to find sago leave for their housing construction. c. Seventh days aventies requested for PGK300 to their training at Bali, East New Britain. <p><u>Waraston POM</u></p> <p>There is no information request received by the management of Waraston POM which only assistance for request. Any request received will be recorded in the Waraston Oil Mill, community request books. There is evidence that all request has been respond by the management base on the records and interview with the workers. Sample of request as per below</p>	Complied

		<ul style="list-style-type: none"> a. 24/06/2023- request for vehicle assistance for church activities at Kimbe town b. 14/06/2023- request for company vehicle for medical check at women`s clinics 	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Communication and consultation procedure documented in the document in the document "Communication and consultation procedure" dated 15/06/2023 signed by Mr Mohamed Azhaza Abdul Aziz, General Manager for NBPOL-WNB. Stated in the procedure, any communication and consultation need to be dealt by receiving department within 30 day, and 90 days' timeframe for any communication/consultation with intervention of other department. The procedure has been communicated to all stakeholders during the stakeholder's consultation with has been conducted for all operating units under West new Britain certification units. As per interview with stakeholders, it has been confirmed that they has been briefed on the procedure and can demonstrate their understanding.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The most recent revision of the stakeholders' list occurred in 2023. which include different category of stakeholder such as local government and authorities, NGOs active in PNG, local communities, business collaborators, educational institutions, and small-scale producers who provide goods to NBPOL.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others.</p> <p>Smallholder Requirement:</p>	<p>There is no changes compare to last year where the management adopt the same policy. The Group Managing Director, Mr. Mohamad Helmy Othman Basha, signed the Group's Sustainability & Quality Policy Statement on December 2, 2019. In this statement, Sime Darby Group expresses its unwavering commitment to fostering good governance and transparency while adhering to the Group's Policies & Authorities and Code of Business Conduct.</p>	Non-compliance

	<p>Organization that is managing the smallholders required to have a written policy committing to a code of ethical conduct and integrity in all operations and transactions</p> <p>- Minor compliance -</p>	<p>The Code of Business Conduct serves as a guiding document for Sime Darby Group, enabling the organization to embrace the fundamental values of Integrity, Respect & Responsibility, Enterprise, and Excellence. These values serve as the guiding principles for conducting business in a fair, honest, and ethical manner. The Code of Business Conduct is applicable across all mills, estates, and the Smallholder Department within the organization.</p> <p><u>Smallholders</u></p> <p>Based on the interview with the sampled smallholders, it was identified that the deduction done by NBPOL for the sale of Fertiliser to the smallholders was not in accordance with the consent forms signed by both parties.</p> <p>Reference made to Incident/Accident/Grievance Form (reference Number: SIK 949; Date: 22/05/2023). The smallholder has raised a concern that he has provided consent for NBPOL to deduct K 1,111,10 from his sales of FFB for the purchase of 10 bags of fertiliser since 2022. The consent form was available for verification dated 14/01/2022, undersigned by the grower, OPIC and NBPOL. Deductions made to the smallholder was noted to be at K1,930.50, which exceeds the amount stated in the consent form. The grievance has been closed dated 08/06/2023, stating that the difference is due to fertiliser price changes. This was not communicated to the smallholder and no consent was obtained for the deduction of the additional amount prior to it being deducted from the smallholder.</p> <p>Due to this being a reoccurrence of the same issue as previous minor nonconformity, it is escalated to major non-conformity.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>The implementation of the policy has been maintained through various means such as:</p> <ul style="list-style-type: none"> - internal audit by sustainability department for each operating unit - regular training and briefing to workers on policies and procedures 	Complied

		- Any cases on in compliance of the policy also can be monitored through the whistleblowing policy that has been established.																
Principle 2: Operate legally and respect rights																		
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.																		
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>Smallholder Requirement:</p> <p>Smallholders are to comply with all applicable PNG or Solomon Islands legal requirements. Organization that is managing the smallholders requires to monitor compliance during extension activities. Block inspection reports to provide evidence of compliance.</p> <p>- Critical (Major) compliance -</p>	<p>The New Britain Palm Oil Limited – West New Britain (hereafter referred as NBPOL – WNB) continued to comply with legal requirements for estates and mill operation. Permit and license checked:</p> <p><u>Mosa POM</u></p> <p>i) Environmental permit under Section 65 of the Environmental Act 2000, permit no. EP-L2B (411) valid for 25 years until 3/4/2037. Limit of BOD for final discharge is < 100 ppm.</p> <p>iii) List of competent persons (boiler operator) and machineries inspection certificates</p> <table border="1"> <thead> <tr> <th>Competency</th> <th>License/Certificate reference</th> <th>Validity period/effective date</th> </tr> </thead> <tbody> <tr> <td>Boiler attendant license</td> <td>Licence no. 1340</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Boiler attendant license</td> <td>Licence no. 1339</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Boiler attendant license</td> <td>Licence no. 1338</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Steam Boiler 2</td> <td>11007</td> <td>Valid until 30/09/24</td> </tr> </tbody> </table>	Competency	License/Certificate reference	Validity period/effective date	Boiler attendant license	Licence no. 1340	Valid until 30/06/24	Boiler attendant license	Licence no. 1339	Valid until 30/06/24	Boiler attendant license	Licence no. 1338	Valid until 30/06/24	Steam Boiler 2	11007	Valid until 30/09/24	Complied
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		<table border="1"> <tr> <td>Steam Separator</td> <td>11011</td> <td>Valid until 30/09/24</td> </tr> </table>	Steam Separator	11011	Valid until 30/09/24			
Steam Separator	11011	Valid until 30/09/24						
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		<p>iv) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 13364 and valid until 30/9/2023. Storage capacity, Diesel: 55,000 litre and approval for dangerous goods storage.</p> <p>v) Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - Electrical Workshop, cert. no. 14996 valid until 31/12/23. - Fabrication Workshop, cert. no. 14995 valid until 31/12/23. - Mill Maintenance Workshop, cert. no. 14994 valid until 31/12/23. - Water Treatment Plant, cert. no. 14993 valid until 31/12/23. - Power house – Mosa Mill, cert. no. 14992 valid until 31/12/23. - Mill Processing Plant – Mosa Mill, cert. no. 14991 valid until 31/12/23. <p><u>Tamare Estate</u></p> <p>i)_Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - Powerhouse: Tamare Silovuti, cert. no. 14939 valid until 31/12/23. <p>ii) Certificate of inspection of boiler pressure vessel, Industrial Safety, Health and Welfare Act 1961</p> <ul style="list-style-type: none"> - Pressure vessel, registration no. PV2888 valid until 30/09/23 <p>iii) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 11383 and valid until 30/9/2023. Storage capacity, Diesel: 11,000 litre and approval for dangerous goods storage.</p>						

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		<p><u>Kapuirā POM</u></p> <p>i) Environmental permit under Section 65 of the Environmental Act 2000, permit no. EP-L2B (411) valid for 25 years until 3/4/2037. Limit of BOD for final discharge is < 100 ppm.</p> <p>ii) List of competent persons (boiler operator) and machineries inspection certificates</p> <table border="1" data-bbox="1048 619 1924 1114"> <thead> <tr> <th>Competency</th> <th>License/Certificate reference</th> <th>Validity period/effective date</th> </tr> </thead> <tbody> <tr> <td>Boiler attendant license</td> <td>Licence no. 959</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Boiler attendant license</td> <td>Licence no. 1371</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Boiler attendant license</td> <td>Licence no. 795</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Steam separator</td> <td>11127</td> <td>Valid until 30/09/24</td> </tr> <tr> <td>Steam Boiler</td> <td>B1783</td> <td>Valid until 30/09/24</td> </tr> <tr> <td>Sterilizer no.1</td> <td>PV2470</td> <td>Valid until 30/09/24</td> </tr> </tbody> </table> <p>iii) Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - Water treatment plant, cert. no. 15044 valid until 31/12/23. - Electrical Workshop, cert. no. 15045 valid until 31/12/23. - Mill Maintenance Workshop, cert. no. 15043 valid until 31/12/23. - Power house – Kapuirā Mill, cert. no. 15046 valid until 31/12/23. - Mill Processing Plant –Kapuirā Mill, cert. no. 15042 valid until 31/12/23. 	Competency	License/Certificate reference	Validity period/effective date	Boiler attendant license	Licence no. 959	Valid until 30/06/24	Boiler attendant license	Licence no. 1371	Valid until 30/06/24	Boiler attendant license	Licence no. 795	Valid until 30/06/24	Steam separator	11127	Valid until 30/09/24	Steam Boiler	B1783	Valid until 30/09/24	Sterilizer no.1	PV2470	Valid until 30/09/24	
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		<p>iv) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 11378 and valid until 30/9/2023. Storage capacity, Diesel: 55,000 litre and approval for dangerous goods storage.</p> <p><u>Rigula Mini Estate</u></p> <p>i)_Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - Tyre House, cert. no. 14989 valid until 31/12/23. - Powerhouse, cert no 14990 valid until 31/12/23. - Mechanical workshop, cert. no. 14988 valid until 31/12/23. <p>ii) Certificate of inspection of boiler pressure vessel, Industrial Safety, Health and Welfare Act 1961</p> <ul style="list-style-type: none"> - Horizontal air receiver, registration no. PV3028 valid until 30/09/23 <p>iii) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 13363 and valid until 30/9/2023. Storage capacity, Diesel: 10,000 litre and approval for dangerous goods storage.</p> <p><u>Malilini Estate</u></p> <p>i)_Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - Tyre Bay, cert. no. 14986 valid until 31/12/23. - Powerhouse, cert no 14985 valid until 31/12/23. - Mechanical workshop, cert. no. 14988 valid until 31/12/23. <p>ii) Certificate of inspection of boiler pressure vessel, Industrial Safety, Health and Welfare Act 1961</p>	
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		<p>- Horizontal air receiver, registration no. PV1867 valid until 30/09/23</p> <p>iii) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 13361 and valid until 30/9/2023. Storage capacity, Diesel: 5,000 litre and approval for dangerous goods storage.</p> <p><u>Waraston POM</u></p> <p>i) Environmental permit under Section 65 of the Environmental Act 2000, permit no. EP-L2B (411) valid for 25 years until 3/4/2037. Limit of BOD for final discharge is < 100 ppm.</p> <p>ii) List of competent persons (boiler operator) and machineries inspection certificates</p> <table border="1" data-bbox="1048 798 1921 1369"> <thead> <tr> <th>Competency</th> <th>License/Certificate reference</th> <th>Validity period/effective date</th> </tr> </thead> <tbody> <tr> <td>Boiler attendant license</td> <td>Licence no. 1373</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Boiler attendant license</td> <td>Licence no. 1365</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Boiler attendant license</td> <td>Licence no. 1349</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Steam separator</td> <td>PV2468</td> <td>Valid until 30/09/24</td> </tr> <tr> <td>Steam Boiler</td> <td>B2469</td> <td>Valid until 30/09/24</td> </tr> <tr> <td>Back Pressure Receiver</td> <td>PV2464</td> <td>Valid until 30/09/24</td> </tr> <tr> <td>Sterilizer no.3</td> <td>PV2461</td> <td>Valid until 30/09/24</td> </tr> </tbody> </table>	Competency	License/Certificate reference	Validity period/effective date	Boiler attendant license	Licence no. 1373	Valid until 30/06/24	Boiler attendant license	Licence no. 1365	Valid until 30/06/24	Boiler attendant license	Licence no. 1349	Valid until 30/06/24	Steam separator	PV2468	Valid until 30/09/24	Steam Boiler	B2469	Valid until 30/09/24	Back Pressure Receiver	PV2464	Valid until 30/09/24	Sterilizer no.3	PV2461	Valid until 30/09/24	
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		<p>iii) Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - Water treatment plant, cert. no. 15029 valid until 31/12/23. - Maintenance Workshop – Waraston Mill, cert. no. 15028 valid until 31/12/23. - Powerhouse – Waraston Mill, cert. no. 15030 valid until 31/12/23. - CPO Mill Processing Plant – Waraston Mill, cert. no. 15027 valid until 31/12/23. <p>iv) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 13374 and valid until 29/9/2023. Storage capacity, Diesel: 24,000 litre and approval for dangerous goods storage.</p> <p><u>Garu Estate</u></p> <p>i)_Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - General Maintenance Workshop - Garu, cert. no. 14941 valid until 31/12/23. <p>ii) Certificate of inspection of boiler pressure vessel, Industrial Safety, Health and Welfare Act 1961</p> <ul style="list-style-type: none"> - Ingersol Air Compressor, registration no. PV1868 valid until 30/09/23 - Horizontal Air Receiver, registration no. PV1869 valid until 30/09/23 <p>iii) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 13386 and valid until 30/9/2023. Storage capacity, Diesel: 9,000 litre and approval for dangerous goods storage.</p>	
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		<p><u>Numundo POM</u></p> <p>i) Environmental permit under Section 65 of the Environmental Act 2000, permit no. EP-L2B (411) valid for 25 years until 3/4/2037. Limit of BOD for final discharge is < 100 ppm.</p> <p>ii) List of competent persons (boiler operator) and machineries inspection certificates</p> <table border="1" data-bbox="1048 579 1924 935"> <thead> <tr> <th>Competency</th> <th>License/Certificate reference</th> <th>Validity period/effective date</th> </tr> </thead> <tbody> <tr> <td>Sterilizer no.1</td> <td>PV1088</td> <td>Valid until 30/09/23</td> </tr> <tr> <td>Steam Boiler no. 1</td> <td>B1775</td> <td>Valid until 30/09/23</td> </tr> <tr> <td>Steam Boiler no.2</td> <td>B1776</td> <td>Valid until 30/09/23</td> </tr> <tr> <td>Back press</td> <td>PV2461</td> <td>Valid until 30/09/23</td> </tr> </tbody> </table> <p>iii) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 13374 and valid until 29/9/2023. Storage capacity, Diesel: 24,000 litre and approval for dangerous goods storage.</p> <p><u>Kumbango Estate</u></p> <p>i)_Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - Tyre bay: Kumbango Div.2, cert. no. 149458 valid until 31/12/23. - Powerhouse: Kumbango Div.3, cert. no 14959 valid until 31/12/23 <p>ii) Certificate of inspection of boiler pressure vessel, Industrial Safety, Health and Welfare Act 1961</p>	Competency	License/Certificate reference	Validity period/effective date	Sterilizer no.1	PV1088	Valid until 30/09/23	Steam Boiler no. 1	B1775	Valid until 30/09/23	Steam Boiler no.2	B1776	Valid until 30/09/23	Back press	PV2461	Valid until 30/09/23	
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		<p>- Horizontal Air Compressor, registration no. PV3201 valid until 30/09/23</p> <p>iii) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 11393 & 11391 and valid until 30/9/2023. Storage capacity, Diesel: 10,000 litre and approval for dangerous goods storage (chemical shed).</p> <p><u>Kumbango POM</u></p> <p>i) Environmental permit under Section 65 of the Environmental Act 2000, permit no. EP-L2B (411) valid for 25 years until 3/4/2037. Limit of BOD for final discharge is < 100 ppm.</p> <p>ii) List of competent persons (boiler operator) and machineries inspection certificates</p> <table border="1" data-bbox="1048 798 1921 1343"> <thead> <tr> <th>Competency</th> <th>License/Certificate reference</th> <th>Validity period/effective date</th> </tr> </thead> <tbody> <tr> <td>Boiler attendant license</td> <td>Licence no. 959</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Boiler attendant license</td> <td>Licence no. 1371</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Boiler attendant license</td> <td>Licence no. 795</td> <td>Valid until 30/06/24</td> </tr> <tr> <td>Back Pressure Receiver</td> <td>11067</td> <td>Valid until 30/09/23</td> </tr> <tr> <td>Steam Boiler</td> <td>B1780</td> <td>Valid until 30/09/23</td> </tr> <tr> <td>Vertical Sterilizer no.5</td> <td>PV 2612</td> <td>Valid until 30/09/23</td> </tr> </tbody> </table>	Competency	License/Certificate reference	Validity period/effective date	Boiler attendant license	Licence no. 959	Valid until 30/06/24	Boiler attendant license	Licence no. 1371	Valid until 30/06/24	Boiler attendant license	Licence no. 795	Valid until 30/06/24	Back Pressure Receiver	11067	Valid until 30/09/23	Steam Boiler	B1780	Valid until 30/09/23	Vertical Sterilizer no.5	PV 2612	Valid until 30/09/23	
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		Vertical Sterilizer no.1	PV2608	Valid until 30/09/23	
<p>iii) Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:</p> <ul style="list-style-type: none"> - Water treatment plant, cert. no. 15033 valid until 31/12/23. - Maintenance Workshop, cert. no. 15032 valid until 31/12/23. - Mill Maintenance Workshop, cert. no. 15043 valid until 31/12/23. - Powerhouse – Kumbango Mill, cert. no. 15034 valid until 31/12/23. - CPO Mill Processing Plant – Kumbango Mill, cert. no. 15031 valid until 31/12/23. <p>iv) License to keep a store where inflammable liquids and/or dangerous goods may be kept, Inflammable Liquids Act 1953 – 1968, serial no. 13375 and valid until 30/9/2023. Storage capacity, Diesel: 55,000 litre (tank no.1), 20,000 litre (tank no.2) and approval for dangerous goods storage.</p> <p><u>Smallholders</u></p> <p>The associated mini estates have continued to comply with PNG legal requirements.</p> <ol style="list-style-type: none"> 1. The ownership of the land used for oil palm cultivation were under Clan Land Usage Agreement (CLUA) and Special Agricultural and Business Lease. All sampled mini estates were able to provide documented evidence of the land ownership. <ul style="list-style-type: none"> - Akami Oil Palm Estate: Special Agricultural and Business Lease dated 08/04/2008 for a period of 99 years. - Pavi Estate (Pavi Oil Palm Limited): Clan Lease Usage Agreement dated 16/06/2019. - Umali Mini Estate: Clan Lease Usage Agreement dated 24/05/2015. 					

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		<p>2. The Smallholders Department conduct annual internal audit on the mini estates to monitor the legal compliances. Records of internal audit reports were available for the sampled mini estates as below.</p> <ul style="list-style-type: none"> - Umali Mini Estate: 04/07/2023 - Moramora Estate: 25/07/2023 - Akami Estate: 20/03/2023 - Umali Estate: 04/07/2023 <p>The smallholders have continued to comply with PNG legal requirements.</p> <p>1. The ownership of the land used for oil palm cultivation were under Clan Lease Usage Agreement (CLUA), Land Settlement Scheme (LSS) or Customary right Purchase (CRP). All sampled smallholders were able to provide documented evidence of the land ownership.</p> <table border="1" data-bbox="1099 847 1935 1385"> <thead> <tr> <th>Smallholder</th> <th>Project</th> <th>Area</th> <th>Evidence of Ownership</th> </tr> </thead> <tbody> <tr> <td>Andrew Gala (088-0002)</td> <td>Liapo VOP</td> <td>1.30 Ha</td> <td>Clan Lease Usage Agreement</td> </tr> <tr> <td>Bernard Nuli (026-0037)</td> <td>Kilu, Patanga & Garile VOP</td> <td>2.39 Ha</td> <td>Clan Lease Usage Agreement</td> </tr> <tr> <td>Cyril Stan Francis (041-0130)</td> <td>Kambili VOP</td> <td>2.16 Ha</td> <td>Clan Lease Usage Agreement</td> </tr> <tr> <td>Johnson Belly (087-0074)</td> <td>Kumali VOP</td> <td>3.74 Ha</td> <td>Clan Lease Usage Agreement</td> </tr> </tbody> </table>	Smallholder	Project	Area	Evidence of Ownership	Andrew Gala (088-0002)	Liapo VOP	1.30 Ha	Clan Lease Usage Agreement	Bernard Nuli (026-0037)	Kilu, Patanga & Garile VOP	2.39 Ha	Clan Lease Usage Agreement	Cyril Stan Francis (041-0130)	Kambili VOP	2.16 Ha	Clan Lease Usage Agreement	Johnson Belly (087-0074)	Kumali VOP	3.74 Ha	Clan Lease Usage Agreement	
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2.1.2	The milling Company has a documented system for ensuring legal compliance in place. This system has a means to track changes to the law and also includes listing and evidence of legal due	NBPOL-WNB had maintained the Legal and Subscribed Register updated on 03/06/2021. The evaluation of the legal requirement applicable to the operations were conducted by Teup Goledu who the company secretary is. The Legal and Subscribed Register was prepared against the conditions	Complied																

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	<p>diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>Smallholder Requirement: Organization that is managing the smallholders shall disseminate information on legal changes to smallholders.</p> <p>- Minor compliance -</p>	<p>within the PNG laws and regulation including the PNG Environmental Act 2000, PNG Environment (Water) Regulation 2002, Environmental Health Act, PNG Industrial Safety, Health and Welfare Act, Child Welfare Act 1961, Conservation Area Act 1978, Education Act 1983, Employment Regulation 1980, Forestry Act 1991, Industrial Relations Act 1962, Land Act 1996, Lands Dispute Settlement Act 1996, Land Groups Incorporation Act 2009, Land Registration Act 2009, Oil Palm Industry Corporation Act 1992, Superannuation Act 2000 and Workers’ Compensation Act. The Legal and Subscribed Register has also included the evaluation of the company’s legal compliance against the RSPO P&C – PNG & SI National Interpretation indicators. There were no new updates on PNG legislative and this has been confirmed with the technical expert and the management of NBPOL itself. Other than obtaining appropriate licenses, the company has also submitted the Annual Environment Performance Report dated July 2022 as per the requirement under the Environmental Permits issued by the Conservation and Environment Protection Authority; and submitted the OSH Integrity Inspection Report 2022 to the Department of Labour & Industrial Relations (Occupational Safety & Health)</p> <p><u>Smallholders</u> The SHA Department disseminate information and update the smallholders and mini estates on the changes on legal requirements during the field days that are conducted for them. Interview with the sampled smallholders and mini estates confirmed that the SHA staffs do keep them updated on the legal changes in the country and the requirements for them to comply with.</p>	
2.1.3	<p>For Company land, legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>For Smallholder land, boundaries have been defined by a registered surveyor and portion numbers allocated by the</p>	<p>The land matters of the company is managed by NBPOL-WNB Lands & Mini Estate Departments. The company is operating on state lease lands and sub-lease lands. The lease documents includes – maps; lease agreements (for both with state and customary land owner); FPIC documentation (for</p>	Complied

<p>Surveyor General OR boundaries of Customary Land have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; AND there is no significant dispute over tenure.</p> <p>Smallholder allotment boundaries may be identified by traditional means provided that boundary locations are agree by all neighbouring parties that share common boundaries.</p> <p>Guidance: Significant disputes are those disputes currently before the Courts.</p> <p>Smallholders requirement:</p> <p>Smallholders, evidence of the “Right to use the land” will be demonstrated by compliance with the following:</p> <p>a) Land title or lease OR uncontested occupancy where</p> <ul style="list-style-type: none"> • Boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General or boundaries have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; • There is no significant dispute over tenure; • Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries. <p>- Minor compliance -</p>	<p>sub-lease from customary land owners) and land titles. Evidence of lease agreement for the sample estates varied as per the following:</p> <p><u>Rigula Mini Estate ILGs</u></p> <p>Gule Land Group Inc.</p> <ul style="list-style-type: none"> - 16/2/2005 – 16/2/2030, lot 2563C: 1,240 ha <p>Rikau Land Group Inc</p> <ul style="list-style-type: none"> - 16/2/2005 – 16/2/2030, lot 2562C: 1,240 ha <p>Melok Land Group Inc</p> <ul style="list-style-type: none"> - 16/2/2005 – 16/2/2030, lot 2564C: 1,240 ha <p>3720 ha (total concession area)</p> <p><u>Tamare ILGs</u></p> <p>Talasea Land Group Incorporation</p> <ul style="list-style-type: none"> - 8/5/2009 -7/5/2049, lot 123C, 6083 ha <p><u>Malilini Estate (state lease)</u></p> <p>Division 1 & 2 – lot2562, 2700 ha (87 years 342 days) 10/4/1993 – 10/04/2080.</p> <p>Division 3 - lot101, 850 ha (99 years), registered on 11/11/1991</p> <p><u>Garu Estate (state lease)</u></p> <p>Lot 90, 5800 ha, 99 years registered under 29/12/1988</p> <p><u>Kumbango Estate (state lease)</u></p> <p>Lease for 99 years, lot 1629, 2070 ha registered on 4/6/97.</p>	
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		<p>SOP for Conducting Boundary Identification Survey – Version 1 August 2023 is referred to for identifying and maintaining boundary stone and marking within estate boundary. Two types of marking and demarcation used; Old Cement Pegs (OCP) or Old Galvanised Iron Pipes (OGIP) and record of inspection updated in the Plantation Boundary Monitoring Checklist, Version 012021. For example at Kumbango Estate inspection of boundary was carried out on 14/4/23 for OCP located at (Division 1, boundary with smallholder LSS Dagi. The other boundary markers (OCP) were made available during site visit as per the following:</p> <table border="1" data-bbox="1048 662 1921 943"> <thead> <tr> <th>Estate</th> <th>Boundary location</th> </tr> </thead> <tbody> <tr> <td>Silovuti (Ove and Tamare) Plantation</td> <td>TM3400 (OCP)</td> </tr> <tr> <td>Garu Plantation</td> <td>GR0700 (OCP)</td> </tr> <tr> <td>Rugila Plantation</td> <td>RH0600 (OCP)</td> </tr> <tr> <td>Malilimi Plantation</td> <td>1243-02C (OCP)</td> </tr> </tbody> </table> <p>Other methods of physical demarcation such as trenches and road boundary were also available and verified during site visit.</p> <p><u>Smallholders</u></p> <p>The evidence of rights to use the land were via Clan Lease Usage Agreement (CLUA), Land Settlement Scheme (LSS) or Customary Right Purchase (CRP).</p> <ul style="list-style-type: none"> - CLUA is a government generated document via OPIC that gives the rights to the smallholders to use the traditionally occupied customary land for the purpose of planting oil palm for a specified period. The clan members are not allowed to sell this land. - LSS is a Land settlement scheme is a state lease land acquired by the government and advertised for smallholders to apply for 	Estate	Boundary location	Silovuti (Ove and Tamare) Plantation	TM3400 (OCP)	Garu Plantation	GR0700 (OCP)	Rugila Plantation	RH0600 (OCP)	Malilimi Plantation	1243-02C (OCP)	
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		<p>development of oil palm. The smallholders that are interested will apply and once approved will be provided a LSS Agreements to occupy the land for a period of time.</p> <ul style="list-style-type: none"> - CRP is a previously customary land which is sold to a non-clan member or other province member that has a long-standing relationship with the clan. This is issued by combined group of clans. <p>All sampled smallholders were able to provide documented evidence of the right to use the land for oil palm cultivation. Evidence as below.</p> <ol style="list-style-type: none"> 1. As for the Mini Estates, the ownership of the land used for oil palm cultivation were under Clan Land Usage Agreement (CLUA) and Special Agricultural and Business Lease. All sampled mini estates were able to provide documented evidence of the land ownership. <ul style="list-style-type: none"> - Akami Oil Palm Estate: Special Agricultural and Business Lease dated 08/04/2008 for a period of 99 years. - Pavi Estate (Pavi Oil Palm Limited): Clan Lease Usage Agreement dated 16/06/2019. - Umali Mini Estate: Clan Lease Usage Agreement dated 24/05/2015. 2. As for the smallholders, the ownership of the land used for oil palm cultivation were under Clan Lease Usage Agreement (CLUA), Land Settlement Scheme (LSS) or Customary right Purchase (CRP). All sampled smallholders were able to provide documented evidence of the land ownership. <table border="1" data-bbox="1099 1171 1933 1364"> <thead> <tr> <th>Smallholder</th> <th>Project</th> <th>Area</th> <th>Evidence of Ownership</th> </tr> </thead> <tbody> <tr> <td>Andrew Gala (088-0002)</td> <td>Liapo VOP</td> <td>1.30 Ha</td> <td>Clan Lease Usage Agreement</td> </tr> </tbody> </table>	Smallholder	Project	Area	Evidence of Ownership	Andrew Gala (088-0002)	Liapo VOP	1.30 Ha	Clan Lease Usage Agreement	
Smallholder	Project	Area	Evidence of Ownership								
Andrew Gala (088-0002)	Liapo VOP	1.30 Ha	Clan Lease Usage Agreement								

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	Bernard Nuli (026-0037)	Kilu, Patanga & Garile VOP	2.39 Ha	Clan Lease Usage Agreement
	Cyril Stan Francis (041-0130)	Kambili VOP	2.16 Ha	Clan Lease Usage Agreement
	Johnson Belly (087-0074)	Kumali VOP	3.74 Ha	Clan Lease Usage Agreement
	Paul T. Tuli (274-0012)	Marapu VOP	1.52 Ha	Clan Lease Usage Agreement
	Benedict Tokanaia (009-0101)	Siki LSS	8.43 Ha	Agricultural Lease
	Manuel Tioni (010-0027)	Dagi LSS	1.75 Ha	Agricultural Lease
	Enos Paul (046-0017)	Rapuri VOP	1.73 Ha	Clan Lease Usage Agreement
<ul style="list-style-type: none"> - The document that provides ownership and rights to use the land for oil palm cultivation has a registered surveyed map that clearly defines the boundaries. - Interview with the sampled smallholders indicated that there are no land disputes that has been reported. Usually when there are disputes it's among the family members and it's resolved within the 				

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		<p>clan. It has been further confirmed by the head of clan and smallholder department.</p> <ul style="list-style-type: none"> - Boundaries has been identified by construction of trenches and planting of coconut or jungle trees. Interview with the smallholders and village head confirmed that here were no disputes of boundaries among the smallholders. 	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements</p>			
<p>2.2.1</p>	<p>A list of contracted parties is maintained. Contracted parties include parties with whom a formal documented contract is in place and Smallholders where the contract is implied through the Smallholder offering fruit for sale by placing it at the pick-up point and the Company accepting the Smallholders offer by collecting it. The price to be paid and other conditions of the transaction are communicated by the Company. Each Smallholder pick-up is a separate transaction.</p> <p>Guidance: The Company docket issued when small-holder fruit is collected is evidence of the contract for that transaction.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>NBPOL maintains their contracted parties in "NBPOL Stakeholders Register Listing". The list is incorporated with other stakeholders such as NGOs, surrounding communities, government agencies, and schools to name a few. The list has the information about names of company, contact persons, contact numbers, and addresses.</p> <p><u>Smallholders</u></p> <p>The SHA Department have established a list of smallholders and mini estates that fall under the certification unit of NBPOL-WNB. The list has details of each and every smallholder and mini estates. Each smallholder and mini estates are provided a docket, individually coded, and linked to their account used for transaction of FFB and payments. Price to be paid for FFB are displayed at the SHA Department notice boards and communicated via SHA Staffs and OPIC Staffs during weekly visits and Field Days.</p>	<p>Complied</p>
<p>2.2.2</p>	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by all parties to the contract.</p> <p>Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Based on several samples of contract agreements for various tasks e.g., replanting and FFB transport, it is confirmed that there are specific clauses that require the contractors to comply with all relevant legal requirements.</p> <p>All smallholder and Mini Estates have undersigned the "<i>Growa Stetment Font</i>" which contains the commitment of the growers on meeting applicable legal requirements. Records of the documents were available for all sampled smallholders and mini estates.</p>	<p>Complied</p>

2.2.3	<p>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.</p> <p>Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <p>- Minor compliance -</p>	<p>Based on several samples of contract agreements for various tasks e.g., replanting and FFB transport, it is confirmed that there is a specific clause that disallows the contractors to hire child, forced and trafficked labour. Onsite observation on FFB transport and replanting operations confirmed that no children were performing the tasks.</p> <p>All smallholder and Mini Estates have undersigned the "Growa Stetment Form" which contains the commitment of disallowing child, forced and trafficked labour and where young workers are employed, they are adequately protected. Records of the documents were available for all sampled smallholders and mini estates.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires: Company plantations, this will be Division or Sub-division, for Smallholder fruit, this will be Smallholder name, Division or Sub-division. Proof of the ownership status or the right/claim to the land by the grower/smallholder. Milling Companies in PNG and the Solomon Islands may only source fruit from their own plantations and directly from Independent Smallholders in geographic proximity that are participants in the Unit of Certification of the applicable smallholder group.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL only received the FFB from its own estate, mini estates and smallholders that fall under the scope of RSPO certification. Total 20 own estates were registered, and list of smallholders maintained by smallholder's affairs department. Proof of ownerships for smallholders has been verified based on clan land use Agreement or state lease (Land Settlement Scheme (LSS)). Copies of the documents maintained by the smallholder's department and available for verification.</p>	Complied
2.3.2	<p>No fruit is to be indirectly sourced through third party traders.</p>	<p>No indirect sourced FFB through third party traders received at all NBPOL – WNB POM.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			

3.1.1	<p>(C) A business or management plan (minimum three years) is documented by the Milling Company that includes the projected contribution of fruit supplied by Smallholders that are within the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL WNB has established a Business Plan from 2023 to 2027 and periodically reviewed on the progress. This business plan provides the strategic roadmap for the CU to achieve long term goals. It also provides business direction and plan for the management to optimize the operation and improve efficiency. Among the information available in the Business Plan is operational expenditures, CAPEX, projected yield (including from smallholders), projected CPO & PKO price, and sales.</p>	Complied												
3.1.2	<p>The Milling Companies develop an annual replanting programme for Company plantations projected for a minimum of five years with yearly review.</p> <p>Smallholder requirements: Organization that is managing the smallholders develop replanting program for smallholders.</p> <p>- Minor compliance -</p>	<p>NBPOL WNB has established its replanting program with a projection until 2030 for all its supplying estates. The programme is annually reviewed during annual management review. The details of replanting programme for all the estates were documented in the CU's Excel spreadsheet entitled "WNB Long Range Replant Programme (LRRP)". The information about area to be replanted is also available in the Business Plan. NBPOL WNB is expecting to replant a total of 14,196.06 Ha in the next 5 years.</p> <p>The Smallholders Replanting Program has been established and documented in the NBPOL WNB Smallholder 5 Years Replanting Program. The management of replanting programs is by the NBPOL WNB Smallholder Affairs Department. The decision to undergo replanting lies solely on the smallholders themselves. Upon deciding to undergo replanting, the smallholders will inform the SHA Department where they will conduct a Replanting Inspection. Based on the results of the inspection, once approved the seedlings will be provided to be planted.</p> <p>Records were available as below: Smallholders 5 Years Proposed Replanting Program</p> <table border="1" data-bbox="1048 1252 1921 1380"> <tr> <td>Year</td> <td>2023</td> <td>2024</td> <td>2025</td> <td>2026</td> <td>2027</td> </tr> <tr> <td>Ha</td> <td>1000</td> <td>1000</td> <td>1000</td> <td>1000</td> <td>1000</td> </tr> </table>	Year	2023	2024	2025	2026	2027	Ha	1000	1000	1000	1000	1000	Complied
Year	2023	2024	2025	2026	2027										
Ha	1000	1000	1000	1000	1000										

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3.1.3	<p>The Milling Company holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>NBPOL WNB has last held its Management Review meeting on 01/08/2023 for RSPO P&C and RSPO SCC. It was chaired by the Projects Officer (Sustainability Dept.) and attended by 10 key personnel. The review was conducted 12 months after the previous review and cover the performance for the period of 01/06/2022 to 31/05/2023. Based on the minutes of meeting, among the agenda discussed were:</p> <ol style="list-style-type: none"> 1) General 2) Results of internal audit 3) Compliance with legal requirements 4) Environmental incidents and communication(s) from external interested parties, including complaints. 5) Environmental performance of NBPOL 6) Domestic water quality 7) Mosa central laboratory 8) Supply Chain Certification Audit 9) Malaria 10) Extent to which objectives and targets have been met 11) Changing circumstances, including developments in legal and other requirements related to its environmental aspects 12) Recommendation for improvement 13) Any other business 14) Follow-up actions from previous management review 	Complied
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Regarding social impacts, approximately 19 CIPs (CIPs 5.1 to 5.19) have been established. Here are some of the plans that have been verified:</p>	Complied

		<p>Overcrowding: This focuses on the employee-to-hectare ratio and mechanization to enhance innovative systems, ultimately increasing operational efficiency. The current status indicates that a Workers Rationalisation Plan is in place and is reported on a monthly basis.</p> <p>Improved Water Quality within Compounds: The goal is to ensure access to portable water throughout all plantations. The status shows ongoing efforts to enhance water quality in compounds that were identified as having subpar water quality during the 2020 management review.</p> <p>Access to Food Gardens: To fulfill regulatory requirements, 300m² of suitable garden area per housing unit (as specified in the Regulations Handbook) is provided for compounds in all new replanting areas near housing units. The status indicates that Gardening Areas have been allocated during the replanting process.</p> <p>With regards to environmental aspects, the followings were planned and implemented:</p> <p><u>NBPOL POM</u></p> <ul style="list-style-type: none"> - Desilting of ponds and preparation for land application - Sludge pit major repair - HDPE geomembrane digester cover - New steam turbine and genset <p><u>CAPEX and CIP for estates</u></p> <ul style="list-style-type: none"> - Upgrading main sewerage system (installation of large Belivet with new sewerage tank and pipeline) 	
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		<ul style="list-style-type: none"> - Installation of new water pump (high water volume bore pump) with pipelinepipe line. - New farm tractor/scissor lift for FFB evacuation - Septic tanks upgrade and soak away to existing building 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of NBPOL WNB Certification Unit’s metrics (economic, social and environment). Data reporting period is January to December 2022 for (social and environment metrics) and economic metrics from Jul 2022 – Jun 2023 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>Smallholder requirements: Organization that is managing the smallholders provides relevant SOP of smallholding operations to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL WNB has established Standard Operating Procedure as guidance for the palm oil mill daily operations. The SOP was documented in Standard Operating Procedures Listing Summary - 2023. Among the sections covered in the SOP are as follows:</p> <ul style="list-style-type: none"> • Milling – General (covering all the mills) • Engineering – General • Milling – Workshops • Transport • Heavy Equipment Workshop • Clinic • Plantations – General • Agronomy • Tractors • Sustainability • Smallholder Affairs • Management Guidelines • Environment Management Plans • Lands & Mini Estate Department 	Complied

		<p>Safety and Health procedure has been established in Operational Safety Management Plan for Planation and Production Department. Among the sections covered in the SOP are as follows:</p> <ul style="list-style-type: none"> • Section 1: Occupational Health and Safety Policy • Section 2: OH&S Committee Member Procedure • Section 3: OHS Responsibility and Communication • Section 4: Risk Assessments • Section 5: Accident and Emergency Response • Section 6: Lost Time Injury Reporting and Recording • Section 7. Initial Reporting Requirements for Incidents (INR) • Section 8: Fatality and Permanent Disability Reporting and Recording • Section 9: Major Incident Flow Chart • Section 10: Workers Compensation Claims • Section 11: Health and Safety Procedures - Plantations / Production • Section 12: Health and Safety Procedures- General <p>For agriculture practice, the following SOPs were made available for verification:</p> <ul style="list-style-type: none"> • MG 01A – New Development, Issue 6; dated 1-May-16 • MG 01B – Replant, Issue 6; 1-May-15 • MG 02 – Nursery, Issue 6; 1-May-16 • MG 03 – Pesticides, Issue 8; 20-Apr-17 • MG 04 – Upkeep, Issue 7; 23-Oct-18 • MG 05 – Harvesting, Issue 8; 24-Oct-18 • MG 06 – Compound Upkeep Practices NBPOL-EI-MG 14, rev. 6, 01/05/2016 • Agro 001 – Leaf Sampling & Processing, Issue 1, 1-Jan-08 • Agro 002 – Soil Sampling in NBPOL Plantation, Issue 1, 1-Jan-13 • Agro 003 – Leaf Sampling & Processing Flow Chart, Issue 1, 25-Aug-11 • Agro 004 – Fertiliser Sampling, Issue 9, 11-Jul-15 	
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		<p>Standard Operating Procedures for Smallholders have been established by NBPOL-WNB and OPIC (Oil Palm Industry Corporation). The SHA Department have provided SOPs for better managing of the smallholder’s plots. Among the SOPs available and verified during the assessment were as below.</p> <p>Standard Operating Procedures – Smallholders List</p> <ul style="list-style-type: none"> – Bogged FFB Collection Tractors and Trailers – Smallholders Auditing – Grievance Flow Procedure – Geographical Information System – Change of Name – Planting – Plantations: Tall Palm Harvesting Near Powerlines – Discrepancy and Grievances – Working with Dimehypo – Etag – Motorbike Use 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>Smallholder requirements: Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.</p>	<p>Apart from daily routine supervision, the sampled management units have their mechanism to monitor the implementation of their procedures, among others through Internal Audit, Performance Monitoring Procedure, Procedure for Contractor Monitoring, and workplace inspections to name a few. Visit reports were made available for verification at all the sampled operating units.</p>	Complied

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	<p>- Minor Compliance -</p>	<p><u>Smallholders</u></p> <p>The SHA Departments maintains records of all FFB received from the smallholders and mini estates in their database. The FFB production records were available for verification for all sampled smallholders and mini estates. Sighted the document EPLASMA – Smallholder: FFB Production Summary (By Block) – NBPOL. Records were verified from 2017 – 2023.</p> <p>Field Days are conducted regularly by NBPOL Smallholder Affairs Departments together with OPIC personals at the smallholder’s plots. The Field Days are conducted as platform to provide trainings, monitor legal compliance, and inspect field conditions and compliance to the RSPO requirements. Trainings that are provided for the smallholders include BMPs, HCVs management, RTE Species, Chemical and Fertiliser Applications, Buffer Zones, etc. Records of Field Day Inspections were available for among others Kambili VOP (30/06/2023), Kilu, Patanga and Garile VOP (29/07/2023), Kumali VOP (28/07/2023) and Marapu VOP (02/02/2023).</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring including any action taken are maintained and available. Among the records verified are:</p> <ul style="list-style-type: none"> - E-SHEQ001 Incident Form, ver. 3, rev. 06/2015 - Estate Structured Crop Recovery Assessment Reports - ESH Monthly Inspection Checklist-Engineering Specific for Oil Mill - Internal audit reports - Daily PPE checklists for various workstations - Wastes disposal records - RTE species monitoring - Plantation Boundary Monitoring Checklist 	<p>Complied</p>

Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.													
3.4.1	<p>(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/outgrower scheme, is documented.</p> <p>Guidance: SEIA will be undertaken where:</p> <p>a) It is required by law; or</p> <p>b) The certified operation meets any of these thresholds:</p> <ol style="list-style-type: none"> 1. Land conversion exceeding 500 hectares; 2. Additional water withdrawal exceeding 500,000 cubic meters per year for irrigation or processing; or 3. Additional industrial wastewater discharge exceeding 10,000 cubic meters per year. <p>The SEIA may be comprised of separate documents being a Social Impact Assessment and an Environmental Impact Assessment provided there is collaboration in the production of the documents to ensure coordination.</p> <p>- Critical (Major) compliance -</p>	<p>Social and environmental impact assessment (SEIA) Report was carried out by David Konge Amos, freelance environment consultant. Report date June 2021 was made available for verification. The methodology of the assessment is including desktop reviews for regulatory and characterization issues, community meeting, stakeholder interviews, household surveys and field inspection visit. The other SEIA verified:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Operating unit</th> <th style="text-align: left;">Date of assessment</th> </tr> </thead> <tbody> <tr> <td>Numundo Oil Mill</td> <td>June 2021</td> </tr> <tr> <td>Kapuiria Oil Mill</td> <td>June 2021</td> </tr> <tr> <td>Kumbango Oil Mill</td> <td>January 2023</td> </tr> <tr> <td>Mini Estate NBPOL</td> <td>August 2009</td> </tr> </tbody> </table> <p>Additionally, Environmental Impact Assessment (EIA) was carried by Sustainability Department – NBPOL for estate and mill operation. The latest review was done in July 2023, under revision 13. The coverage of EIA register includes:</p> <ul style="list-style-type: none"> - Milling operation - Refinery - Construction - Smallholders - Transport/workshop - Plantations - Cattle operation - Kimbe Bulking Terminal 	Operating unit	Date of assessment	Numundo Oil Mill	June 2021	Kapuiria Oil Mill	June 2021	Kumbango Oil Mill	January 2023	Mini Estate NBPOL	August 2009	<p>Complied</p>
Operating unit	Date of assessment												
Numundo Oil Mill	June 2021												
Kapuiria Oil Mill	June 2021												
Kumbango Oil Mill	January 2023												
Mini Estate NBPOL	August 2009												

		<ul style="list-style-type: none"> - Biogas - Nursery - Office - Central stores/CES - Seed Production unit - Sustainability - Roadworks <p>Abnormal and emergency state for the adverse and beneficial environmental aspects were covered in the EIA report.</p> <p>The NBPOL WNB (New Britain Palm Oil Limited Women's Network and Benefits) conducted its 2018 Social Dialogue Report between December 2018 and February 2019 for the entire workforce. This report served as a retrospective review of the initial Social Impact Assessment (SIA) carried out in 2008. The study primarily centered on employees and their dependents, and data collection involved interviews and questionnaires. Data analysis was completed in February 2019, with a particular focus on the following indicators:</p> <ul style="list-style-type: none"> - Overall living conditions in the compounds. - Land-related issues. - Working hours. - Concerns related to female employees, including pregnancy, income, breastfeeding, and domestic violence. - Examination of Personal Protective Equipment (PPE) and services provided by the Security & Construction Department and Clinics. - Issues related to substance abuse and dangerous driving. 	
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		<ul style="list-style-type: none"> - Access to clean water. - Adequacy of toilet and cookhouse facilities. - Availability of transportation for students. - Employee awareness regarding various matters. - Compensation-related concerns. - Identification of other significant issues. <p>The report summarizes the recommendations resulting from the dialogue. Some of these recommendations include:</p> <p>Plantation Management should raise awareness and issue warnings to all employees who continue to support dependents aged 18 years and older.</p> <p>Collaboration between Plantations and Sustainability is encouraged to facilitate the allocation of garden areas during replanting schedules.</p> <p>The NBPOL Women Empowering Women Group is advised to enhance its dialogue and collaboration with plantation sites, particularly in the realm of awareness and training programs, ensuring that all employees are well-informed about its activities.</p>	
3.4.2	<p>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. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every ten years to evaluate the cumulative effect of incremental changes. There</p>	<p><u>Kapiura POM</u></p> <p>Social management plan sighted for 5 years that documented in the "Social management plan for mills in West New Britain Province KAPOM 2019-2023. Several management plans has been listed which some has been classified as completed and ongoing. Sample has been taken for some management plan.</p>	<p>Non-compliance</p>

	<p>shall be evidence that the review includes the participation of affected stakeholders.</p> <p>Smallholder requirements:</p> <p>Improvements suggested at the pre-planting inspection should be noted on the inspection form.</p> <p>- Minor Compliance -</p>	<ul style="list-style-type: none"> a. The management will maintain statistic on reported drugs or substances abuse by workers and dependent. b. Awareness on palm grades, palm supa, death benefits, other employee working conditions and requirement. c. The management will promote sport activities to maintain healthy lifestyle habits in the housing compound. <p><u>Waraston POM</u></p> <p>Waraston POM has established social management plan which has been established on participatory ways for year 2019 until 2023 documented in "WNB mills social management plan" which consist of 7 main objective which related to working hours, superannuation benefits, provision of PPE, pregnancy, living conditions, sustainable livelihoods and services provision. Sample of management plan has been taken as per below.</p> <ul style="list-style-type: none"> a. The management to organize audit literacy trainings for all employees and dependents on financial management, family planning, health and hygiene and other life skill program. b. Waraston POM will promote sport activities to maintain healthy lifestyle habits in its compounds. <p>Awareness on palm grades, palm supa, death benefits, other employee working conditions and requirement.</p> <p>Environmental Aspect Registry, the latest review was conducted by the Sustainability Department – NBPOL dated July 2023. Both significant impact activities were documented in the Beneficial and Adverse Impact Register. The control measures for all the significant aspects were incorporated in the register, whereas the management plans to minimize the impacts were documented under 3 documents entitled:</p>	
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		<p>i) Environmental Instruction: Water and Natural Resource Management Plan, EI-03, rev: 09 dated 13/06/21</p> <p>ii) Environmental instruction: Environmental Instruction, EI-02, rev:11 dated 1/7/2021</p> <p>iii) NBPOL-WNB Continuous Improvement Plan 2014-2025</p> <p><u>Numundo POM</u></p> <p>i) NBPOL Environmental Aspect Register, issue: 13 dated July 2023 has yet to include changes to current practice for:</p> <p>EFB stockpile at ETP area – Operating state under abnormal and emergency has not been identified in the adverse environmental aspects list. Significant environmental impacts on the GHG emission (CH₄) from anaerobic process and leachate generation was not evaluated.</p> <p>ii) SEIA was not made available for plantations and Waraston POM and updated at least once every ten years.</p> <p>Thus, a minor NC was issued.</p> <p><u>Smallholders</u></p> <p>The Smallholder Affairs Department conduct Pre-Planting Inspection at the smallholder plots that have been selected for replanting. A Planting Approval Form – Replant is raised where the Smallholder Affairs officers assess the smallholder’s site on areas such as land Ownership, Topography, Buffer zones, Clearing of the Blocks, Grower and Planting and Production History and Improvements to be done prior to replanting. The Planting Approval Form – Replant was available for verification. Among the improvements that have been noticed are for buffer zone establishments, Re-GPS, Voluntary Palms to be poisoned before replant and areas to be left out from replanting due to steep slopes.</p>	
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<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Smallholder requirements: Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable. - Critical (Major) compliance -</p>	<p>There is evidence that social management plan that has been established has been implemented. Details as per below</p> <p><u>Kapiura POM</u></p> <p>a) The management will maintain statistic on reported drugs or substances abuse by workers and dependent. <u>Implementation:</u> There is evidence that statistic for each cases which the data has been extracted from the clinic and security department. Specific measure has been taken cases by cases.</p> <p>b) Awareness on palm grades, palm supa, death benefits, other employee working conditions and requirement. <u>Implementation:</u> Sighted that communication and briefing of on palm grades, palm supa, death benefits, other employee working conditions and requirement has been done to all the workers base on the training records. Further verification done through interview confirmed that workers can demonstrate their understanding.</p> <p>c) The management will promote sport activities to maintain healthy lifestyle habits in the housing compound. <u>Implementation:</u> Football field, volleyball and basketball court has been established at the housing around and maintained in good condition which has been verified during site visit by the auditors.</p> <p><u>Major Nonconformities M2</u></p> <p>2. Mill management need to organize awareness to female employees ensuring their understanding on the company policy on maternity leave, breastfeeding time and to conduct new mother assessment.</p>	<p>Non-compliance</p>
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		<p>Verification: There was no new mother assessment conducted. A new mother was interviewed, and she mentioned that there is no consultation was done by the management.</p> <p>3. Mill management reconsider temporary workers become permanent employees after 6 months of temporary works instead of renewing temporary extension contracts unless labor is required.</p> <p>Verification: 4 samples workers has been recruited for more than 7 months for core jobs.</p> <p><u>Kumbango POM</u></p> <ul style="list-style-type: none"> ii) Worker AA, Recruited 23/01/2023, Kernel Station Operator iii) Worker BB, Recruited 23/01/2023, Oil Room Operator iv) Worker CC Recruited 23/01/2023, Effluent Pond <p>NBPOL WNB has incorporated its Environment Management Plan in NBPOL WNB Continuous Improvement Plan 2014-25. It was last reviewed in July 2021. Where identification of impacts that requires changes in current practices, to mitigate negative effects, a timetable for change is developed and implemented. The management plan is annually reviewed, and the progress of implementation is monitored through internal audit which is carried out on quarterly. Based on on-site verification, the progress was found to be on track.</p> <p><u>Smallholders</u></p> <p>Internal Audits are conducted annually, for each smallholder within the certification unit. The internal audits are conducted by the Smallholders</p>	
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		<p>Affairs Department. Once the internal audits are done a Quality Improvement Plan (QIP) are issued while onsite with the smallholders. The smallholders are then given 12 days to implement the improvements suggested by the internal auditors. After that they are then revisited to ensure implementation of the recommended improvements. Among the improvements that were noted were awareness on zero burning policy, waste management, SOP on E-Tag, Child Labour Policy Awareness, Grievance Procedure awareness, and BMPs.</p>	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. - Minor Compliance -</p>	<p>Recruitment procedure is available and documented in the document "recruitment and selection policy" issuance No#01/2019 dated 01/08/2019 that has been prepared by Mr Azmey Ghazali, head of human resources, New Britain Palm oil Limited. Detail up in the procedure the 6 steps for recruitment and selection which initiate from requisition management, sourcing and job posting, screening and selection, job offer, onboarding, reporting, and tracking. Stated also in the procedure under clause 3.3.1.3 that all selected applicants will be accessed from several criteria which are qualification, relevant experience, competencies, and personal qualities /attributes. The procedure has made available to the workers and their representative where the procedure has been listed as publicly available document.</p> <p>Stated in the procedure documented in "Disciplinary policy and procedure", March 2017 clause 3.4 Formal procedures for disciplinary action has outline the process of terminations. Types of behaviors has been classified into 3 which are poor behavior, unacceptable, misconduct and gross miss conduct. Details of action taken based on the types of behavior as below</p>	<p>Complied</p>

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		Types of behavior	1 st occasion	2 nd occasion	3 rd occasion	4 th occasion	5 th occasion	
		Poor behavior	Recorded verbal warning	1 st warning letter	2 nd warning letter	3 rd warning letter	Dismissal	
		Unacceptable	1 st warning letter	1 st warning letter	2 nd warning letter	Dismissal		
		Misconduct	Final warning	Dismissal				
		Gross misconduct	Dismissal					
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	<p><u>Tamare Estate</u> 2 samples of workers have been taken in Tamare estate which has been recruited in year 2023. Details as per below</p> <ul style="list-style-type: none"> a. Peter Phillips Types of works: Fertilizer application Application date: 11/04/2023 Employment date: 22/05/2023 Medical check-up date: 21/04/2023 Offer letter date: 26/07/2023. 						Complied

		<p>b. Lincy Jack Types of works: Fertilizer application Application date: 11/04/2023 Employment date: 22/05/2023 Medical check-up date: 21/04/2023 Offer letter date: 26/07/2023.</p> <p><u>Kapiura POM</u> Sample of 2 workers has been taken for those recruited in July'23 which is for mechanic (small engine mechanic) and for line inspection upkeep. Details document as per below</p> <p>a. Jacky BOB (absorbed from temporary workers) on 18/07/23. Application date: 18/07/23 Employment date: 18/07/2023 Medical check-up date: 19/12/2022 Offer letter date: 26/07/2023</p> <p><u>Waraston POM</u> 2 sample workers has been taken to verified the implementation of procedure where has been recruited on 07/03/2023 and all records has been maintained in each personal file. Details of the workers as per below</p> <p>a. Solomon Eki recruited on 07/03/2023 as lab samplers. Induction has been done on 20/02/2023 and application has been made 20/02/2023 with curriculum vitae (CV) attached. Dedared fit based on the medical check-up report "Pre employment medical report"</p>	
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		<p>b. Mickson David recruited on 07/03/2023 as lab samplers. Induction has been done on 13/02/2023 and application has been made 13/02/2023 with curriculum vitae (CV) attached. Dedared fit based on the medical check up report "Pre employment medical report"</p> <p>Sample has been taken termination records which has been terminated on 07/08/2023 for stealing and entering the POM compound during non-working hours. Sighted that termination procedure has been properly implemented and all records has been maintained. The incident happens on 23/07/2023 and has been reported in the security incident report on 23/07/2023. Investigation has been done and identify 3 suspects and suspension letter has been issued 28/07/2023 and investigation done on 30/07/2023 by Senior Security Supervisor for Talasea Group and base on the investigation all 3 suspects has convicted and all 3-suspect admitted guilty. Termination letter dated 07/08/2023 on immediate effect.</p>	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>Smallholder requirements: Organization managing the smallholders to provide advice and training on identification and control of risks through extension activities.</p> <p>- Critical (Major) compliance -</p>	<p>The mills and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. All the identified hazards, risk level and control were registered in the Work Risk Assessment (WRA). The WRA is subject for a review in event of the following:</p> <ul style="list-style-type: none"> - Change in work process - Revision/changes in legislative requirement - Occurrence of accidents <p>Based on the verification of the WRA, appropriate risk control measures were determined and implemented for the respective activities and operation.</p> <p><u>Smallholders</u></p>	Complied

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		<p>The SHA Department have assessed all risks associated to the operations by the smallholders and mini estates. Based on the risk assessments, the SHA conduct regular trainings and field days to create safety awareness among the smallholders and mini estate management and workers. Safety and Hygiene Trainings were documented and verified as below.</p> <ol style="list-style-type: none"> 1. Safe Upkeep Practises conducted at Garu & Kambili VOP on 15/03/2023. 2. Water Boiling Awareness conducted at Kilu and Patanga on 09/05/2023. 3. Water Boiling Awareness conducted at Mosa VOP on 31/07/2023 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of the Health and Safety in the certification unit is monitored and ensured through recording of various checklists and trainings by the management teams of the operating units. Based on site visits of the sampled operations and workstations at the mills and estates, it showed that generally the control measures as per WRA and SOPs were satisfactorily implemented.</p>	Complied
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to those who will be affected by the programme, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>Smallholder requirements: Organization managing the smallholders to provide advice and ongoing support to Smallholders through field days and visits to Smallholder blocks.</p> <p>- Major Compliance -</p>	<p>The sampled operating units have established their annual training programmes for year 2022 and 2023 that covers all aspects of the RSPO Principles and Criteria including gender-specific needs. Generally, the training programmes include best practices, OHS, environment, and sustainability.</p> <p><u>Smallholders</u> The SHA Department with the collaboration with OPIC and OPRA conduct regular field days at all smallholder projects to provide advice and trainings to them. Pop Up Booths are placed at the field day location for smallholders to attend and obtain information that they feel will benefit them. Among advice and support provided by SHA Department include BMP Practices, P&D</p>	Complied

		Management, E-Tag Procedure, Grievance Channels, FFB Pricing Formulas and Health & Hygiene.																			
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis. Appropriate records include records of training or evidence of competency for trade qualifications, boiler operation and other safety related activities such as chemical handling.</p> <p>Smallholder requirements: Smallholder training records are maintained. - Minor Compliance -</p>	<p>Training records were well maintained by the sampled operating units and made available for verification. Among the information available in the records was title of training, date conducted, name of trainer(s), name of participants, and signature of participants. Generally, the topics covered were those related to OHS, standard operating procedures, environment, company's policies, violence & sexual harassment, and complaints/grievance procedure.</p> <p><u>Smallholders</u> The SHA Department with the collaboration with OPIC and OPRA conduct regular field days at all smallholder projects to provide advice and trainings to them. Records of Field Days were available for verification as below:</p> <table border="1" data-bbox="1048 863 1928 1315"> <thead> <tr> <th>Project</th> <th>Field Day Date</th> </tr> </thead> <tbody> <tr> <td>Nahavio Division - Dagi</td> <td>16/05/2023</td> </tr> <tr> <td>Kilu & Patanga – Talasea Division</td> <td>11/07/2023</td> </tr> <tr> <td>Nahavio & Kavui Division</td> <td>04/07/2023</td> </tr> <tr> <td>Siki LSS</td> <td>05/02/2023</td> </tr> <tr> <td>Valoka VOP</td> <td>25/04/2023</td> </tr> <tr> <td>Buvussi LSS</td> <td>23/05/2023</td> </tr> <tr> <td>Mamota Estate</td> <td>18/07/2023</td> </tr> <tr> <td>Silanga</td> <td>13/06/2023</td> </tr> </tbody> </table>	Project	Field Day Date	Nahavio Division - Dagi	16/05/2023	Kilu & Patanga – Talasea Division	11/07/2023	Nahavio & Kavui Division	04/07/2023	Siki LSS	05/02/2023	Valoka VOP	25/04/2023	Buvussi LSS	23/05/2023	Mamota Estate	18/07/2023	Silanga	13/06/2023	Complied
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3.7.3	<p>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.</p> <p>- Minor Compliance -</p>	<p>All the mills have conducted their SCCS training in 2023. The trainings were attended by the key personnel which includes the executives, admin clerks, weighbridge operators, laboratory, and security. At the group level, a third-party training provider was appointed to conduct a training on 25/05/2023. The training was attended mainly by the executives from all the mills. Records of training was made available for verification.</p>	Complied
Criterion 3.8: Supply chain requirement for mills			
3.8.1	<p>Identity Preserved Module</p> <p>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.</p> <p>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.</p>	<p>This certification is a multi-mills certification. The FFB received are from certified sources either from the owned estates or smallholders that are associated with the mills.</p> <p>The NBPOL Supply Chain Management Guidelines rev 13 dated July 2021 has correctly identify the supply chain module Identity Preserved.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Not Applicable (NA) as the mills opted for IP.</p>	Not Applicable
3.8.3	<p>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</p>	<p>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.</p>	Complied

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	<p>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.</p>		
<p>3.8.4</p>	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>All 5 mills have met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace. Company has registered in PalmTrace system as follows:</p> <p><u>Mosa Mill</u> Members ID: RSPO_PO1000000020 License valid until 09/12/2023</p> <p><u>Kapuiria Mill</u> Members ID: RSPO_PO1000007539 License valid until 09/12/2023</p> <p><u>Numondo Mill</u> Members ID: RSPO_PO1000007478 License valid until 09/12/2023</p> <p><u>Waraston Mill</u> Members ID: RSPO_PO1000007522 License valid until 09/12/2023</p> <p><u>Kumbango Mill</u> Members ID: RSPO_PO1000007582 License valid until 09/12/2023</p>	<p>Complied</p>

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<p>3.8.5</p>	<p>Documented procedures</p> <p>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:</p> <ul style="list-style-type: none"> 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 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. 	<p>NBPOL WNB has developed their Supply Chain Management Guideline to ensure the implementation of all elements of the applicable supply chain model specified including the rules on market communications and claim.</p> <p>Among the essential records maintained by the mills are the transaction documents of FFB reception, production and delivery of CPO and PK, mass balance accounts that show the volume received and dispatched. Apart from that, training records were also well maintained.</p> <p>Based on the Supply Chain Management Guideline, the Head of Production of each mill is the person assigned to have the overall responsibility for and authority over the implementation of the requirements and compliance with all applicable requirements. Based on interview, the Heads of Production of all the mills were able to demonstrate awareness of the mills' procedures for the implementation of this standard.</p> <p>Since all the mills do not accept any non-certified FFB, the risk of contamination is very unlikely. The mills are running their operations and producing their products based on NBPOL's standard operating procedures for milling.</p>	<p>Complied</p>
<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> 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. 	<p>The implementation of the RSPO SCCS internal audit is guided by the Supply Chain Management Guideline. The last internal audits were conducted from 12-27/07/2023 covering all the five mills. The audit was conducted in tandem with the Sustainability Department. Based on the audit checklist and audit report, all clauses in RSPO SCCS and RSPO Market Communications and Claims were adequately covered.</p> <p>However, the reporting format stipulated in their procedure was not used. Thus, a non-conformity was assigned due to this lapse.</p>	<p>Non-compliance</p>

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	<p>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.</p>		
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>As this is an Identity Preserved certification, the mills only receive and process certified FFBs from its own supply bases and smallholder associated to the mills. However, due to the smallholders that may sometimes be suspended from supplying to the mills, the FFBs will not be allowed into the mill. These FFBs will be isolated until further decision by the management and this process was mentioned under handling of non-conforming FFB and/or documents. Verification of tonnage received and sources of certified FFB as per below example:</p> <p><u>Kapuirā POM</u> WB ticket Number: 142677, Estate’s DO: 994166 Supplier: E793 – WNB Malilimi Estate Date of delivery: 11/7/2023 Weight/truck/field/bunches: 13.26mt/CONP225/M0500/716 RSPO certificate no.: RSPO 728122</p> <p>WB ticket Number:142616, Estate’s DO: 144411 Supplier: E804 – WNB Rigula Mini Estate Date of delivery: 11/7/2023 Weight/truck/field/bunches: 13.14mt/C260/R0800/612 RSPO certificate no.: RSPO 728122</p> <p>WB ticket Number:142668</p>	<p>Complied</p>

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		<p>Supplier: 8001000376 – smallholder Date of delivery: 11/7/2023 Weight/truck/field: 13.26mt/C199/Kapuirā Settlers (242-0300 to 252-677) RSPO certificate no.: RSPO 728122</p> <p><u>Waraston POM</u> WB ticket Number:41200 Supplier: 8001000376 – smallholder Date of delivery: 12/8/2023 Weight/truck/field: 14.32mt/C240/B West VOP/(019-0041 to 019-0136) RSPO certificate no.: RSPO 728122</p> <p>WB ticket Number: 41118, Estate’s DO: 03630 Supplier: E794 – WNB Numundo Estate Date of delivery: 9/8/2023 Weight/truck/field/bunches: 13.345mt/CONP257/NN0400, NN1000/537 RSPO certificate no.: RSPO 728122</p> <p>WB ticket Number: 41166, Estate’s DO: 919421 Supplier: E803 – WNB Lolokoru Mini Estate Date of delivery: 11/8/2023 Weight/truck/field/bunches: 12.24mt/C267/LK1800/649 RSPO certificate no.: RSPO 728122</p> <p><u>Numundo POM</u></p>	
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		<p>WB ticket Number:139309 Supplier: 8001000376 – smallholder Date of delivery: 14/8/2023 Weight/truck/field: 14.86mt/C185/B West VOP/(019-0095 to 062-0501) RSPO certificate no.: RSPO 728122</p> <p>WB ticket Number: 139359, Estate’s DO: 928381 Supplier: E800 – WNB Tamare Estate Date of delivery: 9/8/2023 Weight/truck/field/bunches: 12.04mt/CONP139/TM2600/1,484 RSPO certificate no.: RSPO 728122</p> <p>WB ticket Number: 139341, Estate’s DO: 002777 Supplier: E796 – WNB Garu Estate Date of delivery: 14/8/2023 Weight/truck/field/bunches: 15.58mt/C168/GT0100/504 RSPO certificate no.: RSPO 728122</p> <p><u>Kumbango POM</u> WB ticket Number:133671 Supplier: 8001000376 – smallholder Date of delivery: 17/8/2023 Weight/truck/field: 20.80mt/CONS41/Genesis Real Estate/103-0023 RSPO certificate no.: RSPO 728122</p>	
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		<p>WB ticket Number: 133672, Estate’s DO:994641 Supplier: E793 – WNB Malilimi Estate Date of delivery: 17/8/2023 Weight/truck/field/bunches: 14.52mt/C257/MM02A0/835 RSPO certificate no.: RSPO 728122</p> <p>WB ticket Number: 131691, Estate’s DO: 933021 Supplier: E787 – WNB Kumbango Estate Date of delivery: 16/7/2023 Weight/truck/field/bunches: 13.08mt/C160/KB06A0/614 RSPO certificate no.: RSPO 728122</p> <p>The MG-26 SCC rev. 13 dated July 2021 had described that the site shall inform the CB immediately if there is a projected over production of certified tonnage</p>	
<p>3.8.8</p>	<p>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):</p> <ol style="list-style-type: none"> 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; 	<p><u>Kumbango Mill</u></p> <ul style="list-style-type: none"> • The name and address of the buyer – Kumbango Refinery • The name and address of the seller – Kumbango Mill • The loading or shipment/ delivery date: March 2023 • The date on which the documents were issued, 30/03/2023, dispatch ticket no. 363 (via pipeline) • A description of the product, including the applicable supply chain model, e.g. “RSPO CPO IP” • The quantity of the products delivered: 92.02 mt • Related transport documentation, e.g. 30/03/2023, dispatch ticket no. 014407 • Supply chain certificate number of the seller: RSPO 728122 • A unique identification numbers - TR-dadacfac-ffcd 	<p>Complied</p>

	<p>e. RSPO certificate number;</p> <p>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g. The quantity of the products delivered;</p> <p>h. Any related transport documentation;</p> <p>i. A unique identification number.</p>	<p><u>Kapiura Mill</u></p> <ul style="list-style-type: none"> • The name and address of the buyer – Kumbango Refinery • The name and address of the seller – Kapuira Mill • The loading or shipment/ delivery date: March 2023 • The date on which the documents were issued, 25/07/2022, dispatch ticket no. 24705 • A description of the product, including the applicable supply chain model, e.g. "RSPO CPO IP" • The quantity of the products delivered: 30.44 mt • Related transport documentation, e.g. 25/07/2022, dispatch ticket no. 013676 • Supply chain certificate number of the seller: RSPO 728122 • A unique identification numbers - TR-ce1c48e7-9ae4 <p><u>Mosa Mill</u></p> <ul style="list-style-type: none"> • The name and address of the buyer – Kumbango Refinery • The name and address of the seller – Mosa Mill • The loading or shipment/ delivery date: July 2022 • The date on which the documents were issued, 25/07/2022, dispatch ticket no. 015191 • A description of the product, including the applicable supply chain model, e.g. "RSPO CPO IP" • The quantity of the products delivered: 30.44 mt • Related transport documentation, e.g. 25/07/2022, dispatch ticket no. 024682 • Supply chain certificate number of the seller: RSPO 728122 • A unique identification numbers - TR-ce30c6fa-698a 	
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		<p><u>Waraston Mill</u></p> <ul style="list-style-type: none"> • The name and address of the buyer – Kumbango Refinery • The name and address of the seller – Waraston Mill • The loading or shipment/ delivery date: October 2022 • The date on which the documents were issued, 15/10/2022, dispatch ticket no. 05615 • A description of the product, including the applicable supply chain model, e.g. "RSPO CPO IP" • The quantity of the products delivered: 30.22 mt • Related transport documentation, e.g. 15/10/2022, dispatch ticket no. 05615 • Supply chain certificate number of the seller: RSPO 728122 • A unique identification numbers - TR-a083c397-92e4 	
3.8.9	<p>Outsourcing Activities</p> <p>i. The mill shall not outsource its milling activities. In cases where he 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</p> <p>ii. The mill shall ensure the following:</p> <p>a. The mill has legal ownership of all input material to be included in outsourced processes</p> <p>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.</p>	<p>There is no outsourcing of mill activities. NBPOL-WNB handles all the mill process. The storage facilities are not related to this certification as it is handled and managed KOR and both these facilities maintained their own RSPO Supply Chain Certification.</p>	Complied

	<ul style="list-style-type: none"> c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	There is no outsourcing of mill activities. NBPOL-WNB handles all the mill process.	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.	NBPOL fully aware on the requirement. Furthermore, as it is not expected to have any outsourced activities, this risk is minimal. Additional to this, NBPOL-WNB has declared to BSI in the pre-audit information as requested before commencement of audit.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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: 	<p>Each mill have Daily and Monthly Production Summary Report. The summary reports the Crops received, Production data (milling hours, ton/hour, oil production, oil extraction, kernel production, kernel extraction rate, CPO stocks and dispatch, PK stocks and dispatch, Oil quality, Kernel quality, process data, oil loses, and kernel loses. The production summary reports demonstrate the balance of received FFBs and deliveries of CPO and PK. The CPO and PK quantities available in the mill are recorded using the Storage Tank Records excel sheets and Kernels Stock & Dispatch record excel sheets and monitored on real-time basis.</p> <p>As per the MG-26 SCC rev. 13 dated July 2021, the minimum retention time for all documentation is 3 years and generally all documents have been stored for 5 years.</p>	Complied

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	<ul style="list-style-type: none"> a. Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 		
3.8.13	<p>Extraction Rate</p> <p>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.</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Daily Mill Production Report (DMRP) shows that extraction rates updated and based on CPO and PK actual performance.	Complied
3.8.15	<p>Processing</p> <p>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.</p>	<p>Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill does not receive any FFB from uncertified supply base, therefore all CPO and PK produced are 100% certified.</p> <p>However, due to the smallholders that may sometimes be suspended from supplying to the mills, the FFBS will not be allowed into the mill. These FFBS will be isolated until further decision by the management.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <ul style="list-style-type: none"> i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold 	The monthly stock records of the PK and CPO volumes transfer to the refinery or crusher plant was reviewed. The records shows that the closing stock at the refinery or crusher are well balanced, and the products are not kept more than 3 months. The final products will be shipped out by the	Complied

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	<p>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.</p> <p>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.</p>	<p>refinery or crusher latest by 2nd month after receiving from the mills. While the shipping announcement for the mill will be then executed. The records of the PalmTrace transactions were verified and the announcements are promptly done as per established procedure. As verified in the PalmTrace system, all the volumes sold under conventional were removed.</p>	
3.8.17	<p>Claims</p> <p>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.</p>	<p>As one of Sime Darby Plantation Bhd’s subsidiaries, NBPOL has communicated their stakeholders about their RSPO Certification through on their website https://sime-darbyplantation.com/ .There is no trademark logo used by the certification unit. The description of the certification does not lead consumers to believe that being an RSPO member implies the company is producing RSPO certified oil palm products. There is also no communication regarding NBPOL’s RSPO membership. The only claims made was the business-to-business claims whereby the RSPO certificate number and the products was correctly stated in the CPO and PK delivery documents.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an ‘off-product’ claim.</p>	<p>As one of Sime Darby Plantation Bhd’s subsidiaries, NBPOL has communicated their stakeholders about their RSPO Certification through on their website https://sime-darbyplantation.com/ . There is no trademark logo used by the certification unit. The description of the certification does not lead consumers to believe that being an RSPO member implies the company is producing RSPO certified oil palm products. There is also no communication regarding NBPOL’s RSPO membership. The only claims made was the business-to-business claims whereby the RSPO certificate number and the products was correctly stated in the CPO and PK delivery documents.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p>	<p>As one of Sime Darby Plantation Bhd’s subsidiaries, NBPOL has communicated their stakeholders about their RSPO Certification through on their website https://sime-darbyplantation.com/ . There is no trademark</p>	Complied

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	<p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>	<p>logo used by the certification unit. The description of the certification does not lead consumers to believe that being an RSPO member implies the company is producing RSPO certified oil palm products. There is also no communication regarding NBPOL’s RSPO membership. The only claims made was the business-to-business claims whereby the RSPO certificate number and the products was correctly stated in the CPO and PK delivery documents.</p>	
<p>4.3</p>	<p>In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	<p>As one of Sime Darby Plantation Bhd’s subsidiaries, NBPOL has communicated their stakeholders about their RSPO Certification through on their website https://sime-darbyplantation.com/ . There is no trademark logo used by the certification unit. The description of the certification does not lead consumers to believe that being an RSPO member implies the company is producing RSPO certified oil palm products. There is also no communication regarding NBPOL’s RSPO membership. The only claims made was the business-to-business claims whereby the RSPO certificate number and the products was correctly stated in the CPO and PK delivery documents.</p>	<p>Complied</p>
<p>4.4</p>	<p>Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.</p>	<p>As one of Sime Darby Plantation Bhd’s subsidiaries, NBPOL has communicated their stakeholders about their RSPO Certification through on their website https://sime-darbyplantation.com/ . There is no trademark logo used by the certification unit. The description of the certification does not lead consumers to believe that being an RSPO member implies the company is producing RSPO certified oil palm products. There is also no communication regarding NBPOL’s RSPO membership. The only claims made was the business-to-business claims whereby the RSPO certificate number and the products was correctly stated in the CPO and PK delivery documents.</p>	<p>Complied</p>

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4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	As one of Sime Darby Plantation Bhd’s subsidiaries, NBPOL has communicated their stakeholders about their RSPO Certification through on their website https://simedarwinplantation.com/ . There is no trademark logo used by the certification unit. The description of the certification does not lead consumers to believe that being an RSPO member implies the company is producing RSPO certified oil palm products. There is also no communication regarding NBPOL’s RSPO membership. The only claims made was the business-to-business claims whereby the RSPO certificate number and the products was correctly stated in the CPO and PK delivery documents.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	All certified CPO and PK are delivered to NBPOL Kumbango Oil Refinery and NBPOL KCP respectively and these facilities belongs to NBPOL-WNB located at the same vicinity of Kumbango Oil Mill. The delivery document, which is the weighbridge ticket has the information about the RSPO certificate number and supply chain model is stated as part of the product description.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	All certified CPO and PK are delivered to NBPOL Kumbango Oil Refinery and NBPOL KCP respectively and these facilities belongs to NBPOL-WNB located at the same vicinity of Kumbango Oil Mill. The delivery document, which is the weighbridge ticket has the information about the RSPO certificate number and supply chain model is stated as part of the product description.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: 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	Not Applicable as the mills are not a distributors or wholesalers.	Not Applicable

	<p>the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	All NBPOL-WNB POM produced 100% RPSO-IP certified oil palm content.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	All NBPOL-WNB POM produced 100% RPSO-IP certified oil palm content.	Complied
	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.	All NBPOL-WNB POM produced 100% RPSO-IP certified oil palm content.	Complied
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <p>a. RSPO trademark which includes the tag 'CERTIFIED' or</p> <p>b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least</p>	There was no evidence of RSPO label being used by all the mills.	Complied

	4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	There was no evidence of storytelling in product-related communications being stated by the mills in any forms.	Complied
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting 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,	NBPOL-WNB adopted human right policy which has been documented in "Human right policy" dated 12/07/2023 signed by the general manager, Mr Azhazha Abdul Aziz. Stated in policy the management commitment to respect, support and uphold fundamental human rights as per stated in the	Non-compliance

	<p>operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Universal Declaration for human rights which covers employees, suppliers, smallholders, and local communities. There is evidence that the policy has been communicated to all workers during the morning muster call base on the communication records and has been confirmed through interview with the workers itself.</p> <p>Major Non-conformities M4</p> <p>Stated in the procedure documented in "Disciplinary policy and procedure", March 2017 clause 4.1.3, Disorder behaviour and fighting at workplace that any employee including his/her dependent/relatives involve fighting and abusive behaviour at workplace or any company premises may result in employees been suspended and further dismissal.</p> <p><u>Kumbango Estate:</u></p> <p>A worker (referred as WA) has been dismissed following an incident where her husband assaulted an office clerk (referred to as Staff AA) within the housing compound on 05/03/2023. A statement issued on the same date, SHEQ001, alleged that the worker had provoked her husband to attack staff AA. However, there is a lack of concrete evidence supporting WA's culpability, and the investigation was conducted only three months later, specifically on 23/06/2023.</p> <p><u>Malilimi Estate:</u></p> <p>An incident occurred involving a worker who was apprehended by the police for causing the death of his sister's husband. This took place as he was defending his sister (referred to as XX) from an attack by her husband within the housing compound on 03/01/2023. Within 24 hours, XX was terminated by the estate's management in order to uphold a peaceful environment on</p>	
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		the premises. This termination occurred without any compensation, and the management also agreed that XX was not guilty.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance -	NBPOL WNB prohibits any form of harassment in their operation as per policy that has been established. Interview with the workers and stakeholders confirmed that they are aware of prohibition for any harassment by the management and action will be taken for any cases of harassment that happen. As verified during the audit, there was no harassment cases that has happen in both estates that been confirmed through interview with both workers and stakeholders.	Complied
Criterion 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 -	Mechanism to grievance/complaint has been established by NBPOL-WNB and has been documented in the "Grievances procedure guideline" updated in July 2023 where stated that all pertinent stakeholders, including employees, have the right to raise complaints in the event they identify any violations of company policies by the company itself or its employees. This pertains particularly to the Human Rights Policy, in which NBPOL-WNB is committed to upholding the principles outlined in the United Nations Universal Declaration of Human Rights and the two associated covenants, including the safeguarding of human rights defenders. The management of NBPOL-WNB has taken steps to guarantee that individuals who raise complaints will be safeguarded and not face the risk of job loss or any form of retaliation.	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 -	New Britain Palm Oil Limited (NBPOL) has introduced the Communication & Consultation Procedure, version 3, dated 04/07/2020, with the following overarching objectives:	Complied

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		<ul style="list-style-type: none"> • Facilitate the open and efficient exchange of information among all stakeholders of NBPOL, which encompasses both internal parties (including employees) and external stakeholders. • Address and promptly rectify grievances or concerns raised against NBPOL's operations in a timely and appropriate manner. <p>This procedure clearly delineates the department responsible for responding to various types of communications. For instance, the Sustainability Department will handle communication with NGOs and government bodies pertaining to environmental, social, and new development projects. These communications may take the form of written correspondence, phone calls, emails, or verbal discussions. The details of grievances or communications will be meticulously recorded in grievance registers and community request books at the respective sites.</p> <p>The timeline for managing and responding to grievances and requests is as follows:</p> <p>For internal grievances, responses are to be provided within 10 days of reporting. Any grievances requiring further investigation must be communicated to the involved party within a maximum of 90 days.</p> <p>In the case of external grievances, the receiving Department is expected to respond within 30 days. Any grievances necessitating additional investigation should not exceed a 90-day timeframe.</p> <p>Furthermore, this procedure has been communicated to internal stakeholders, such as employees and their dependents residing within the compound, during social awareness programs.</p>	
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<p>4.2.3</p>	<p>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 -</p>	<p><u>Tamare Estate</u></p> <ol style="list-style-type: none"> 1. Dated 31/07/2023. <ul style="list-style-type: none"> -Complaint of high price at the sundry store -The management decided to brought tenant to discuss on appropriate marks up set by the land department -Closed on 01/08/2023 -Discussion with tenant sighted on 02/08/2023 2. Dated 30/07/2023. <ul style="list-style-type: none"> -complaint received anonymously which grievance related to non-workers that living at the housing compound has been chased by the security -The management decided to conduct training not keep any non-workers in the housing area and to fill up PF5 form for any visitors <p>Communication to the workers has been done on 01/08/2023 to all workers during the morning mustercall</p> <p><u>Kapiura POM</u></p> <p>There are 3 complaints has been received by the management in year 2023 and there are complaint in 2022. Details</p> <ol style="list-style-type: none"> a. Admin staff requested for phone CUG that can be used internal communication between the operating units on 03/02/2023 nd as per interview, the purchasing process is still pending due to the supplier 	<p>Non-compliance</p>

		<p>already stop their business and the management is looking for other quotation. However, it has been highlighted as closed on 14/02/2023.</p> <p>b. There is 1 complaint from Kapom elementary school on dog waste which need to be cleared by teacher and kids on daily basis on 17/02/2023. However, it only been resolved on 06/08/2023 which is 6 months after the the complaint received. There is no specific reason of the delay.</p> <p><u>Rigula Estate</u> There is 1 complaint received by the management on 16/04/2023, where there is 1 case of death due to Malaria due late of ambulances arrival which expected total of 4 hours. The management has responded that this is due to the ambulance has been placed at Kapiura and need to travel for any emergency cases. The management decided that the ambulance (A#427) will reallocate back to Rigula Estate /Malilini Estate. However, as the day of audit, there is no action has been taken but has been classified as resolve by the management. Thus, a non-conformity was assigned due to this lapse.</p> <p><u>Waraston POM</u> Complaint records has been recorded in the complaint records book and has been responded accordingly by the management. Sample of complaint taken for complaint made on 09/05/2023 related to the security matters in Waraston area and surrounding where there are robbery and holdups done by the anonymous gang. The management has responded by calling the complainer and security department for meeting. From the meeting, both parties agreed that housing compound curfew will be initiated which is on 9pm. Other than that, security department will do check-up for each visitor's transport, and each visitor need to register in the visitors book.</p>	
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4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>According to the statement outlined in the Whistle-blower Policy, complainants are given an additional option. In the event of their dissatisfaction with the company's response, they possess the right to escalate the matter and access to independent legal and technical advice.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>Smallholder requirements: Smallholder should participate in Field days and other extension activities delivered by organization managing the smallholders. All records shall be maintained.</p> <p>- Minor compliance -</p>	<p>The contributions to community development plans have been integrated into the 2023 Action Plan, reflecting key issues raised during External Stakeholder Workshops. Some of the notable contributions identified include:</p> <ol style="list-style-type: none"> 1. Enhancing the safety of communities. 2. Improving cash-crop production, such as cocoa and coconut. 3. Providing equipment donations to the Police, Health, and other sectors. 4. Reinstating the NBPOL Book donation program for schools. 5. Implementing a program aimed at enhancing food security. <p>In addition to the aforementioned initiatives, NBPOL-WNB has previously introduced a financial uplift program for smallholders. This program aims to enhance the overall financial management of smallholder families through the introduction of a "Papa Card" and "Mama Card" system. Under this system, a portion of the income from the sale of Fresh Fruit Bunches (FFB) is allocated to the "Mama," typically the female head of the household responsible for managing the family's domestic needs. This program not only improves financial management but also contributes to reducing ongoing domestic violence.</p>	Complied

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		<p><u>Smallholders</u> The SHA Department with the collaboration with OPIC and OPRA conduct regular field days at all smallholder projects to provide advice and trainings to them. Records of Field Days were available for verification as below:</p> <table border="1" data-bbox="1048 507 1924 957"> <thead> <tr> <th>Project</th> <th>Field Day Date</th> </tr> </thead> <tbody> <tr> <td>Nahavio Division - Dagi</td> <td>16/05/2023</td> </tr> <tr> <td>Kilu & Patanga – Talasea Division</td> <td>11/07/2023</td> </tr> <tr> <td>Nahavio & Kavui Division</td> <td>04/07/2023</td> </tr> <tr> <td>Siki LSS</td> <td>05/02/2023</td> </tr> <tr> <td>Valoka VOP</td> <td>25/04/2023</td> </tr> <tr> <td>Buvussi LSS</td> <td>23/05/2023</td> </tr> <tr> <td>Mamota Estate</td> <td>18/07/2023</td> </tr> <tr> <td>Silanga</td> <td>13/06/2023</td> </tr> </tbody> </table> <p>Interview with the sampled smallholders and mini estates management indicated that they do participate in the field days and have acknowledged that the fields days have been very beneficial.</p>	Project	Field Day Date	Nahavio Division - Dagi	16/05/2023	Kilu & Patanga – Talasea Division	11/07/2023	Nahavio & Kavui Division	04/07/2023	Siki LSS	05/02/2023	Valoka VOP	25/04/2023	Buvussi LSS	23/05/2023	Mamota Estate	18/07/2023	Silanga	13/06/2023	
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<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>																					
<p>4.4.1</p>	<p>(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 where such documents have been issued by the appropriate Government agency. For Customary land where such documents are not available, evidence of ownership will be demonstrated as follows: - Critical (Major) compliance -</p>	<p>Kapiura POM is alienated government land which is state owned under the Specia Agricultural Business Lease (SABL) for 99 years lease agreement between NBPOL-WNB and Papua New Guinea. Where the lease expired, the land will be under customary land ownership inhibited by indigenous people of Ubai/ Bilomi Ward council within the Bialla rural Local Level Government (LLG) of Nakanai district which previously under Talasea District. While for Numundo POM is has been leased from state government under the portion 744 which located in the Haella Estate. Waraston POM is located</p>	<p>Complied</p>																		

		<p>in Numundo Estate under the portion 597, and Mosa POM under the Bebere Estate portion 178.</p> <p>For 5 samples estate, there is 2 types of ownerships which is directly leased from the state government (Malilimi Estate, Kumbango Estate and Garu Estate) and the other 2 is leased under customary right between NBPOL and Incorporated land Group (ILG)</p> <p>For Rigula Estate, there are 3 ILG which Rikau ILG, Gule ILG and Masile ILG where the negotiation started in 2005. Sighted sublease agreement for each ILG for period of 25 years starting from 16/02/20205 until 16/02/2030. There is evidence that all ILG has been registered under Land Group Incorporation Act Chapter 147 based on the certificate of recognition of incorporated land group. Details of land title sighted as per below:</p> <ul style="list-style-type: none"> a. Rikau ILG- Lot 2563C b. Gule ILG- Lot 2562C c. Masile LG- Lot2564C <p>While for Tamare Estate, there is only one ILG which is under Talasea Land Group and has been subleased for 25 years until 2030. Sighted land title reference number 17189 total 6083Ha.</p> <p>For the other estate, Details of ownerships as per below</p> <p>Malilimi Estate-</p> <ul style="list-style-type: none"> a) land title number 19229/2562 leased for 87years 342 days. b) land title number 19073/0101 leased for 99 years starting from 1990. <p>Garu Estate</p>	
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		<p>a) Land title number 68/4403 for years since 27/10/1998 Kumbango Estate</p> <p>a) Portion 1629 land title reference number 65/3198 total 2070 Ha</p>	
	<p>4.4.1(a) For PNG, there are no written laws on customary land, but decisions are guided by customs of the landowning group or clan and documented in a CLUA (Customary Land Use Agreement) which is valid for one planting cycle only. Decisions on land use and distribution are normally done conventionally at the level of the clan and may vary from clan to clan. Individuals only have exclusive rights to use and occupy land based on verbal and mutual agreement, whilst undisputed outright ownership status of customary land is vested in the clan. Traditionally, clans decide on occupancy and user rights. One has to be a member of a land-owning group through custom in order to have access to land.</p>	<p>Sub-lease agreements for customary land are established through the Incorporated Land Group (ILG) arrangement where it has been initiated by clan groups with the primary aim of formalizing customary land ownership. This process allows for the creation of Special Agricultural Business Lease agreements under the Land Act of 1996 between the ILGs and the Papua New Guinea (PNG) Lands Department, thereby legalizing the leasing of their lands.</p>	
	<p>4.4.1(b) For Solomon Islands, Customary Land may be recorded in accordance with the Customary Lands Record Act 1994 (as amended). This act provides for the Recording officer appointed by the National Records to determine the Customary Owners, the survey the land with maps to be held at the Central and other Land Record offices. Other mechanisms to manage Customary Land may be applied.</p> <p>Companies must be able to demonstrate that where they have leased customary land, they have negotiated with the recognised owners of the land or their authorised representatives and have observed full FPIC requirements in those negotiations with all required details being appropriately documented.</p>	<p>Not applicable for Papua New Guinea.</p>	

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	The incorporation of ILGs, the landowners have given their consent to leaser to develop the land. While this arrangement has always be recognized as a "joint venture" agreement between NBPOL-WNB and the ILGs.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making - Minor compliance -	The customary land development is controlled by the clan leaders and the clan communities. As stated in indicator 4.4.2, consent of the clan shall be available prior a sub-leasing can commence. As sub-leasing of lands are clan affairs, clan members (or families) within the clan are involved in deciding the use of land. Since the development of oil palm in PNG, clans are making the initiatives to engage with NBPOL-WNB for land development.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken - Minor compliance -	Since the development of oil palm in PNG, clans are making the initiatives to engage with NBPOL-WNB for land development. NBPOL-WNB does not trigger any form of development. Since the land are not going to be developed until the sub-lease agreement is finalized, the ILGs still have the rights to withhold the consents if the terms are not agreeable.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	The sub-leasing is regulated under Section 54 of Land Registration Act. Land sub-lease agreements on customary land through Incorporated Land Group (ILG) arrangement are available. Please refer to indicator 2.1.3 for details of the sub-leasing agreement. In the sub-lease agreement, it states the number of years of lease and the economic benefits to the ILGs. The sharing of the economic benefits will be under the jurisdiction of the Clan leaders.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Maps are attached with the sampled land lease and sublease approved by PNG Department of Land Office. The scale of the maps is of either 1:15,000 or 1:25,000 or 1:38,000 are available. The customary land map or land settlement scheme maps are on files for each smallholder.	Complied

4.4.4	<p>All relevant information is available in appropriate forms and the English language, including assessments of impacts, proposed benefit sharing, and legal arrangements. Explanatory documentation may be provided in Tok Pisin in PNG or Solomon Pijin in the Solomon Islands and verbal presentation may be made in those languages.</p> <p>- Minor compliance -</p>	<p>The information incorporation of land groups are detailed in the Management Guidelines MG-21 Lands & Mini Estates Guidelines rev.3, dated June 2014.</p> <p>The information of proposed benefits and legal arrangements are available in the Sub-lease agreement as detailed in indicator 2.1.3. The agreements are in English, and it is a government regulated agreement as the customary land rights are heavily protected by the PNG Department of Lands & Physical Planning. The Land Act protects customary land and as such it would be unlawful for a big project development to take place on customary land without formalizing the land administration process through the relevant government authorities.</p>	Complied
4.4.5	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The sub-lease agreements are government regulated agreement. As per the sub-lease agreement audited (please refer to indicator 2.1.3), the definition of Landlord (meaning the ILGs) includes in the case of natural person the executors, administrators and assigns of the Landlord and in the case of a company its successors and permitted assigns and where the context permits includes any person authorised by the Landlord to act on its behalf.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is reviewed in consultation with affected parties midway through the term of the agreement however regular communication between the parties is encouraged through the duration of the agreement.</p> <p>- Minor compliance -</p>	<p>As per the sub-lease agreement audited (please refer to indicator 2.1.3), the agreed terms especially regarding the economic will be reviewed fifteen (15) years from the date of the sub-lease agreement.</p> <p>Other than such review, the ILGs are identified as external stakeholders of the company whereby the ILGs are invited to involve in the annual external stakeholder workshop. Records of the external stakeholder workshop for year 2019-2021 shows the attendance of ILGs.</p>	Complied
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>There has been no new planting development since the last assessment visit. Should there be any, Management Guideline MG-21 Lands & Mini</p>	Complied

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	- Critical (Major) compliance -	Estates Guidelines for Land Acquisition Practices rev. 3, dated 06/2014 will be used.	
4.5.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. As identified in the Management Guidelines, environmental and social impact shall be considered.	Complied
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed.	Complied
4.5.5	<p>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</p>	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the	Complied

	legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed.	
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 -	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	There is no new land acquisition identified during this audit. As per discussion with the management, there is no intention acquire new land other than maintaining the current state lease lands.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation unless a full FPIC process has been undertaken with recognised community representatives and their right to use the land is verified in accordance with 4.4.1. - Critical (Major) compliance -	There is no new land acquisition identified during this audit. As per discussion with the management, there is no intention acquire new land other than maintaining the current state lease lands. If there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			

<p>4.6.1</p>	<p>(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 -</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&C. The above are identified in Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p>	<p>Complied</p>
<p>4.6.2</p>	<p>(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. Distribution of monies within families is determined by the families. Guidance: Where possible, Companies shall set up banking arrangements with the ILGs to provide for monies to be paid directly into members’ bank accounts at the agreed percentages to avoid the possibility of theft or diversion of funds. - Critical (Major) compliance -</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom but</p>	<p>Complied</p>

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		<p>must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&C. The above are identified in Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p>	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings in accordance with National law.</p> <p>- Minor compliance -</p>	<p>The PNG customs varies from province and region to another. In some parts of PNG, the descendants of a particular tribal group or clan inherit land through patrilineal descent (male lineage) while others follow a matrilineal descent (female lineage). Hence the equal opportunities are provided in accordance with the PNG custom practices.</p>	Complied
4.6.4	<p>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 provided that the right to privacy and confidentiality is respected.</p> <p>- Minor compliance -</p>	<p>There is no compensation for loss of legal, customary or user rights identified during this audit. In case of any such compensation it will be dealt according to the Land Act.</p> <p>While if there is any land dispute due to the current operations, it is dealt following the Communication & Consultation Procedure ver. 3 dated 04/07/2020. Depending on the dispute, it will be managed either by the NBPOL-WNB Smallholder Affairs Office or Lands & Mini Estates Department.</p>	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary</p>	Complied

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		<p>interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&C. The above are identified in Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p>	
<p>4.7.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&C. The above are identified in Management Guidelines</p>	<p>Complied</p>

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		MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.	
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 expansion identified in this audit. Despite there is not such expansion that may cause loss of access and rights, NBPOL-WNB has set priority to employed local workers. Evidence on not only local workers is hired but equal opportunity of promotion was audited. Local business opportunity such as grass cutting, and non-operational upkeep maintenance are awarded to local communities.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. Guidance: In some circumstances where FPIC was conducted many years ago, documented evidence of the process may not be available. In these cases, evidence of continuing agreement of all parties shall be regarded as evidence of resolution. - Minor compliance -	To clarify, NBPOL-WNB does not directly "acquire" any land. The lands developed by NBPOL-WNB are exclusively comprised of State lease lands or Sub-lease Lands in collaboration with Incorporated Land Groups (ILGs). Given that NBPOL-WNB's operations have been established for an extended period, dating back to the 1960s, many Free, Prior, and Informed Consent (FPIC) agreements are no longer in existence. Nevertheless, it has been demonstrated that there is a sustained consensus with the surrounding communities, and significant land disputes between NBPOL-WNB and landowners are absent. In the event of any present-day land conflicts within management units, these conflicts will be addressed in accordance with the Communication & Consultation Procedure, version 3, dated 04/07/2020. Depending on the nature of the dispute, the responsibility for management will fall to either the NBPOL-WNB Smallholder Affairs Office or the Lands & Mini Estates Department.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented	There were no new land conflicts recorded. Records on resolution of previous land conflict are maintained. The resolution includes independent land market evaluation by the Provincial Valuer.	Complied

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	and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Documented records of the clan negotiation, participatory mapping, scratched maps and final accepted of the compensation is available.	
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 -	Please refer to indicator 4.4.2, 4.4.3 and 4.4.4 for details regarding the management of land development within NBPOL-WNB. There is no such land acquisition.	Complied
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 -	Documented records of the clan negotiation, participatory mapping, scratched maps and final accepted of the compensation is available.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (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 FFB Price used to pay the smallholders and mini estates are divided into 2 which are Farm Gate Price and Mill Gate Price. The price changes on a monthly basis. The prices are displayed at the SHA Department Office for all smallholders and mini estate owners to see. Besides that, the SHA Department have posted the information on social media such as Facebook for the smallholders to see. WhatsApp groups have been established with each project and the prices are regularly updated in the group channels. Other than that, the management also has appointed PIC for each smallholder for any queries and guidance in relations to pricing information.	Complied

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5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The SHA with collaboration with OPIC conducts regular Field Days and trainings at each smallholder’s village and mini estates. Among the trainings provided are on the FFB Price Formula. Records of training were available for verification. Based on the interview with the sampled smallholders and Mini Estate Growers, it was acknowledged that they have been provided with adequate training to understand the FFB Pricing Formula.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. Premium pricing, when achieved for RSPO certified sustainable palm oil is also shared with Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The FFB Price Calculation is provided by the Department to Economic Advisor on a monthly basis. The monthly price calculation was available for verification which indicates the formula to calculate the FFB Price payable to the smallholders and mini estate which takes into account variable such as US\$ Price for CPO CIF Rotterdam, US\$ Price for PKO Rotterdam, CPO and PK Extraction Rate, Exchange rate US\$ to Kina, Freight Cost US\$ and FFB Transport Cost (Kina). Reductions are included for Levy’s for OPRA, Sexava and OPIC and the final price is paid for the smallholders. FFB pricing calculation has been verified by the auditor and available to smallholders during regularly conducted trainings and field days. As per interview with the smallholders, FFB have been paid based on the agreed price and there have been no cases of underpayment.</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties within the Unit of Certification, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the basis on which their fruit is sold to the Companies. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. To assist this, Companies include financial literacy information in their extension activities.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL Smallholder Department have included the OPIC and all smallholders within the certification regardless of gender in decision making in regard to the smallholders. Pricing of FFB is discussed with the presence of OPIC to the smallholders during Field Days. Repayments for Fertiliser and seedlings are done through credit and deducted when the smallholders send their FFB to the mill. This was done by the smallholders providing a written consent that they are purchasing the items on a credit basis and provide the mill with the authority to deduct they FFB payment. Samples of consent forms were available for verification. Interview with female smallholders found out that they have their right in decision making in term of selling FFB, fertilizers credit decision.</p>	Complied

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		Financial Literacies training are being carried out by the smallholder department among the smallholders. Interview with the sampled smallholders confirmed that they have been provided trainings on financial literacy and have found the trainings to be very beneficial. Sampled the Financial Literacy Training conducted at Tamare, Kilu, Patanga, Garile and Pasiloke dated 12 – 24/04/2023 available for verification.	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe their obligations and the obligations of the Company to whom they are selling their fruit.</p> <p>- Minor compliance -</p>	There is no contractual agreement between NBPOL and smallholders. NBPOL is obliged to process all smallholders FFBs in accordance with the International Development Association for agricultural development Act 1970. The growers have signed a <i>Growa Stetment Fom</i> where they have acknowledged and committed to comply with all legal and RSPO requirements. Interview with the sampled smallholders clearly indicated that they understand and implement the standards that have been put in place by RSPO and NBPOL.	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>Guidance: Weight of FFB may be determined by weighing at the point of pick-up or by calculation of average bunch weight when weighed at the verified mill weighbridge. The organization managing the smallholders should determine the data used for payment and communicated to all smallholders.</p> <p>- Critical (Major) compliance -</p>	Payments of FFB to the smallholders and Mini Estates are made on a timely manner every fortnightly and payment is deposited directly to the bank account or by cheque. Dockets of the smallholders and mini estates were sighted to confirm the weight of the FFB sold to NBPOL. Despite the FFB being weighed at the receiving mill’s weighbridge, the payment will be based on the weight at the collection by the FFB trucks. Samples of payment receipts were available for verification during the assessment. Interview with the sampled smallholders indicated that all payments were done in a timely manner. Receipts of FFB were provided at the SHA Department or through the staff representatives or OPIC.	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). Other weighing equipment used may be calibrated using weights that are verified on the weighbridges. Records are maintained to provide an audit trail.</p> <p>- Minor compliance -</p>	NBPOL has 5 mills within the certification unit and all mills receive certified FFB from smallholders and mini estates. Each mill has its own weighbridge that weighs the trucks that brings in the smallholders and mini estate’s FFB. The weighbridge is calibrated by an independent 3 rd party on a yearly basis. The last calibrations were carried out in November 2022 for all the	Complied

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		<p>weighbridges at the mills. Certificates of calibration were made available for verification.</p> <p>As for the smallholders, NBPOL assigns FFB Trucks to collect the smallholder’s and Mini Estate’s FFB from their blocks to the mill. The FFB Truck weighs the FFB which has been placed on a net at the marketplace (block platforms) in the presence of the smallholder and mini estate management using a calibrated crane. They then issue a chit stating the weight of each net to the growers. The FFB trucks are then brought to the mill to be weighed on the mill’s weighbridge before unloading at the mill ramps. When there are discrepancies of +/- 300 Kg from the weighbridge ticket and marketplace weighs, the trucks are sent to the Transport Department to be calibrated once again.</p> <p>The process of calibration involves the Trucks’ Crane System lifting a 1.542 mt block that has been calibrated on the weighbridge. When there are discrepancies, the crane system will undergo repairs and calibrated. The process will repeat till the recalibration shows results of 1.520mt, with an allowable variance of +/- 10kg. Only then the trucks are able to resume FFB collection.</p>	
5.1.8	<p>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.</p> <p>- Minor compliance -</p>	<p>WNB – NBPOL continuously supports the smallholders via the established Smallholders Affairs Department. The SHA Department with collaboration with OPIC conduct regular Field Days and Field Visits to provide the smallholders with continuous trainings, especially on GAP and assistance to support them in compliance towards the RSPO standards and National Regulations. This was further confirmed by the smallholders during the sampled interviews conducted.</p>	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL-WNB have established the Communication and Consultation Procedure to ensure free and effective communication between all NBPOL stakeholders and external stakeholders.</p> <p>As for the smallholders, a Grievance Flowchart for Smallholder Growers has been established.</p>	Complied

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		<p>The flowchart states that the smallholders are to raise their grievances to OPIC where they are to detail out the grievances on the Incident/Accident/Grievance Form provided by OPIC. OPIC then escalates the form to NBPOL Smallholder’s Department. The Smallholder Department maintain a registry to monitor all grievances raised by the smallholders. Grievance Committee Meetings are conducted every fortnight to discuss on all the grievances raised buy the smallholders. The issues are then addressed by NBPOL accordingly. Samples of Incident/Accident/Grievance Form, Grievance Registry (and Grievance Committee Meetings Minutes were available for verification during the assessment. It was evident that the grievances were addressed and responded in a timely manner.</p>	
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	<p>WNB – NBPOL continuously consults the smallholders, irrespective of Race, Religion of Gender via the established Smallholders Affairs Department to assess the needs for support to improve their livelihoods. The SHA Department with collaboration with OPIC conduct regular Field Days and Field Visits to provide the smallholders with continuous trainings, especially on methods to improve their production and livelihoods. This was further confirmed by the smallholders during the sampled interviews conducted.</p>	Complied
5.2.2	<p>The Company and Government Extension Service provide extension services to support the development and implementation of livelihood improvement programmes, including capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard.</p> <p>PROCEDURAL NOTE: The RSPO is currently developing a separate standard for Independent Smallholders to be referred to as the "RSPO</p>	<p>NBPOL-WNB Smallholder’s Affairs Department provides extension services to smallholders to support the development and implementation of livelihood improvement programmes. The services have been provided on consultation, fertilizers loans and vehicle for transporting FFB. Consultation on BPM is done during the Field Days, Internal Audit Inspections and random trainings that are conducted by the SHA team. This was further confirmed by the smallholders during the sampled interviews conducted.</p>	Complied

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	Independent Smallholder Standard". A National Interpretation for PNG&SI will be developed after the standard is ratified. - Minor compliance -		
5.2.3	Where applicable, the Company and Government Extension Service provide extension services to Smallholders to enhance their understanding of the legal requirements for FFB production to maintain RSPO certification. - Minor compliance -	PIC for each group smallholder has been appointed by NBPOL Smallholder's Department where they are responsible to communicate and train smallholder understanding on legal requirements. This was further confirmed by the smallholders during the sampled interviews conducted.	Complied
5.2.4	(C) Evidence exists that pesticide handling training is available from the Company and/or Government Extension Service for Smallholders within the Unit of Certification. This may be verified by interview with the Smallholders. - Critical (Major) compliance -	As for WNB – NBPOL Certification Unit, it has been a practise that all chemical handlers shall undergo a specific chemical handling training by OPIC if they are to use chemicals in the operations. This was confirmed by the smallholders themselves during the interviews. Most of the sampled smallholders opted to manually brush the weeds themselves and avoided the use of chemicals in their operations. As for the mini estates on the other hand, some have opted to use chemicals to address the weed conditions in the mini estates. Interview with the chemical handlers of the mini estates confirmed that they have been provided with chemical handling training, and records of training certificates were available for verification during the visit to the sites.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The progress and performance of smallholders were reported through field inspection reports and the reports are accessible by public. Samples has been taken for sample smallholder on the field inspection report for the year 2023.	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 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	NBPOL has developed Employee Rights & Equal Employment Opportunities Policy dated 25/07/2016 where NBPOL is committed to eliminate any	Complied

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	<p>based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>unlawful or unfair discrimination on the grounds of race, colour, gender, religion, disability, age, ethnic/national origins, marital status, religious or ethical beliefs, etc. The company will use positive discrimination to encourage an ethnically diverse workforce across the company to protect against social inequality. Other than the policy mentioned, the company also established Human Rights Policy to highlight the equal opportunities and discrimination based on any grounds in recruitment, dismissal or promotion is strictly prohibited.</p> <p>As per verification, there is evidence that policy has been communicated and explained to all workers base on the training records and interview with the workers itself.</p> <p>Mosa POM: 21&22/07/2023 Tamare Estate: 24/04/2023 Kapiura POM: 10/07/2023 Rigule Estate: 20/06/2023</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Interviewed and verified through salary slips shows that there is no discrimination in terms of salary payment especially for similar work scope. As per interview confirmed that there are no recruitment fees has been charged for newly recruited workers.</p>	Complied
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There is evidence that the management of each operating units can demonstrates recruitment selection has been done based on quality and assessment. It has been verified based on sample of document as per outlined in the 3.5.2. While for training, training has been provided for all the workers base on nature of jobs.</p>	Complied

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6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Interviewed with the female employees at WNB mills and plantations confirmed that pregnancy testing is not conducted in discriminatory measure and only with the consent from workers. No pregnancy test included in the pre-employment medical check-up. They still will be able to offer for work if they are pregnant.</p>	Complied
6.1.5	<p>(C) A Social Issues Committee (SOC) is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL has introduced guidelines for the Social Issues Committee, titled "Enhancing and Implementing Gender Equity and Social Inclusion in the Workplace," dated May 2020. The company is firmly dedicated to fostering a just and equitable environment that is devoid of discrimination. This commitment extends to ensuring the active involvement, accessibility, and social inclusion of women, individuals with disabilities, people living with HIV and AIDS, and other marginalized groups in all facets of NBPOL's operations. The Social Issues Committee has been established to formulate, implement, and oversee the effectiveness of the Standard Operating Procedures (SOPs) developed for this purpose. The committee's responsibilities encompass raising awareness, identifying and addressing concerns specific to women, recognizing opportunities for improvement, and ensuring the execution of Gender Smart Audits and subsequent recommendations.</p> <p>The meeting's agenda included discussions on the following topics:</p> <ol style="list-style-type: none"> 1. Social Awareness Schedule 2. Presentation Materials 3. Assessment of New Mothers' Needs 4. Human Rights Policies 5. Maternity Leave and Breastfeeding Provisions 6. Social Issues Data 	Complied

		Meeting minutes were documented, and resolutions pertaining to the issues discussed during the meeting were highlighted. To facilitate the planning of awareness training topics at various operational sites, a tentative Social Awareness Schedule for 2023 was developed. This schedule covers a range of subjects, including health and hygiene, law and order/security, company policies, sustainability matters, HR awareness, and Women Empowering Women (WEW) initiatives.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Reviewed payslips in each operating units which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the legal requirement without any discrimination. This has confirmed through interview with the workers comprises of female and male.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW)..			
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 the English language and verbally explained to them in language they understand. - Critical (Major) compliance -	NBPOL adopt with local regulations which is Employment Act No.54 in 1978 (Consolidated up to March 31/03/2001) which stated pays and benefits for all workers. As per stated in the regulations, workers will be entitled for 14 days of paid leave and 18 days of sick leave. Stated also that only public servant pregnant women will be entitle for maternity leave before delivery (as per advised of medical advisor), 6 weeks maternity leave for confinement. If required where female workers unable to performs job after confinement period, additional leave up to 4 weeks max. Hence, female workers work with NBPOL are not entitled for maternity leave. Gazette public holiday for Papua New Guinea in the document National Gazette No. G775 Public Holiday Act (Chapter 321) dated 10/10/2022 which gazzeted 12 days of public holidays for year 2023 which included National reembrace day on 24/07/2023, national repentance days on 26/08/2023 and national Remembrance Day of the late first prime minister on 24/02/2023.	Complied

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		<p>For minimum wages, it has been documented in the National Minimum Wages revised on 01/01/2023 which stated that minimum wages are at PGK3.50. Paying rates at NBPOL-WNB documented in the document "WNB, HOP, MBE and POL: Nonexecutive pay rates for January-December'23" which pay rates is table up base workers and level. Sample has been taken for grade 1 and 2 as below:</p> <table border="1" data-bbox="1048 606 1921 986"> <thead> <tr> <th colspan="2">NBPOL Grades and levels</th> <th>Pay rates Jan-Dec'23 (PGK)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td>1</td> <td>3.71</td> </tr> <tr> <td>2</td> <td>3.95</td> </tr> <tr> <td>3</td> <td>4.24</td> </tr> <tr> <td rowspan="3">2</td> <td>1</td> <td>4.43</td> </tr> <tr> <td>2</td> <td>4.71</td> </tr> <tr> <td>3</td> <td>5.01</td> </tr> </tbody> </table> <p>Other than that, employment contract is available which has been provided to all the workers and documented in the document "non-executive staff services contract grade 1.1-2.3". There is evidence that employment contract has been documented in English and as per interview, they can demonstrate their understanding on the content of the employment contract.</p>	NBPOL Grades and levels		Pay rates Jan-Dec'23 (PGK)	1	1	3.71	2	3.95	3	4.24	2	1	4.43	2	4.71	3	5.01	
NBPOL Grades and levels		Pay rates Jan-Dec'23 (PGK)																		
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2	1	4.43																		
	2	4.71																		
	3	5.01																		
6.2.2	<p>(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</p>	<p>NBPOL introduced the General Policies & Regulations Handbook in May 2010. This handbook provides a concise summary of employment conditions, explicitly detailing aspects such as working hours, overtime, annual leave, sick leave, housing, electricity, water, promotions, loans,</p>	Complied																	

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	<p>compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p> <p>Family members who work must be employed to ensure that they have access to those benefits. Notwithstanding that, young children may assist their parents on Smallholder blocks provided it does not interfere with their schooling, their physical and emotional development and they are under the direct supervision of their parents.</p> <p>- Critical (Major) compliance -</p>	<p>advances, probation notices, and maternity leave. Payslips have been reviewed to ensure that they comprehensively outline the various types of work performed and deductions made by the company.</p> <p>The most recent pay rates, in effect from January to December 2021, are made readily available to the public on notice boards across mills and estates. Piece-rated workers, such as those in the harvester gang, base their earnings on the most recently published rates. In FY2021, NBPOL WNB established specific rates for different roles, including cutters, wheelers, and loose fruit collectors, which vary based on years of planting (YOP). For non-executive staff in WNB, HOP, MBE, and POL, the pay rates for January to December 2021 are referenced for hourly and fortnightly compensation, taking into account NBPOL's grading and job level.</p> <p>Furthermore, NBPOL WNB continues to adhere to the wage scale approval issued by the Department of Labor, which provides partial payment of the National Minimum Wage.</p> <p><u>Smallholders</u></p> <p>As for the mini estates, it was identified that they do hire workers for harvesting and pesticides work and FFB Transport. All workers were provided with contract agreements detailing the payment terms and length of contract. The contract agreements have been acknowledged by both parties and available for verification. Verified the contract agreement between Pavi Estate and Transport Contractor for the Transport of FFB to the Mill dated Jan 2023 and contract agreement between John Siwisika Estate and his Cutters, Wheelers, and Stackers dated 31/07/2023.</p> <p>Smallholders usually do the harvesting, brushing and field upkeep works by themselves and do not employ external workers. This was confirmed during the interview with the smallholders. It was further confirmed that children</p>	
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		<p>below the age of 18 do not get involved in the blocks. Family members above the age of 18 years do help with work in the blocks and are paid and compensated adequately above the minimum wages.</p>	
<p>6.2.3</p>	<p>(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 -</p>	<p>There is no regulated on paid maternity leave for Papua New Guinea, however there is evidence that the management will allow for female workers to apply for maternity leave. One sample worker that deliver baby on 04/07/2022 and allow to take maternity leave for 2 weeks and able to start work back after the conferment. Interview confirmed that she decided to start works after only 2 weeks of confinement because she need money for the baby. Nonetheless, consideration is given by the company for the new mothers to have light job and chemical free.</p> <p>Verification has been done by auditor on holiday pays and as per National Gazette No. G775 Public Holiday Act (Chapter 321) dated 10/10/2022, 24/02/2023 has been gazetted as public holiday for national Remembrance Day of the late first prime minister.</p> <p>Nonetheless, it was observed that ineffective monitoring on compliance to legal working hours, overtime, rest periods, and employment termination, based on the following evidence:</p> <p>a) Stated in Employment Contract 1978 Chapter 373, clause 35 (2) terminations of contract without notice, where a party to a contract has given notice of intention to terminate under section 34, either party may, without waiting for the expiry of that notice, terminate the contract by paying to the other party a sum of equal to the amount of salary that would have accrued to the employee during the period of notice.</p> <p>Stated in the employment contract appendix5; termination of employment, 2 weeks' notice if employed 1 year or more and less than 5 years.</p> <p><u>Malilimi Estate</u></p> <p>One worker has been terminated in 24hours without notice due to one incident with the aim of upholding a harmonious atmosphere within the</p>	<p>Non-compliance</p>

		<p>compound. Despite the worker's tenure of over 2 years with the company, no compensation has been paid.</p> <p>b) Stated in Employment Contract 1978 Chapter 373, clause#49(1); Maximum daily hours and rest period that subject to subsection (5) and to variation under registered award, an employee shall not be required to work more than 12 hours in any one day</p> <p><u>Numundo POM</u> A worker has been detected working beyond the prescribed limit of overtime, totalling more than 44 hours, for 2 consecutive months. The authorization for this overtime has been formally submitted in the document OT Approval Form. Samples have been taken for the second fortnight of both May 2023 and June 2023.</p> <p>c) Stated in Employment Contract 1978 Chapter 373, clause#49(2)(b); Maximum daily hours and rest period, shall not be required to work for more than 5 hours without a meal or rest period of not less than 30 minutes of he has been allowed a rest period of at least 10 minutes during that period; and (c) shall not be required to work for more than 5 hours without a meal or rest period of not less than 40 minutes of he has not been allowed a rest period of at least 10 minutes</p> <p><u>Numundo POM/Kapiura POM</u> As per interview with the sample workers, the workers informed that they have not been informed on breaking hours/rest periods. The workers mentioned that they need to work for 8 hours consecutively. Subsequent verification with the management corroborated the absence of documented break and rest hours, and no evidence could be found indicating that such information had been conveyed to the workers.</p>	
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		<p>c) Inconsistent workers salary payment.</p> <p><u>Malilimi Estate</u></p> <p>Sample of 5 loose fruits picker has been taken and found out there is inconsistent payment for total loose fruit tonnage base on the pay slips and productivity records for PPE#20230521. Details as per below</p> <p>Workers AA</p> <p>Total L/F tonnage as per productivity records: 3630kgs</p> <p>Total L/F tonnage as per pay slips: 3,810kgs</p> <p>Different: 180kgs</p> <p><u>Garu Estate</u></p> <p>Sample of 5 harvesters has been taken and found out there is inconsistent payment for total bunches base on the pay slips and productivity records for PPE#20230521. Details as per below</p> <p>Workers AB</p> <p>Total bunches as per productivity records: 1,237 bunches</p> <p>Total bunches as per pay slips: 1,051bunches</p> <p>Different: 186 bunches</p> <p>e) At Malilimi Estate, a worker (Emp. ID #E793) was given three days of medical leave by the Health Extension Officer i.e., 29, 30 and 31/08/2022) due to injury from work. Based on company’s policy, he shall be paid for 3 days under “injury leave” term. However, based on his pay slip (PPE#20220911), he was only paid for 1 day under “sick pay” term.</p> <p>Thus, a non-conformity was assigned due to these lapses.</p>	
6.2.4	(C) The Company provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare	<u>Mosa POM</u>	OFI

	<p>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. Smallholders may live in houses of traditional materials or other accommodation of their choosing.</p> <p>- Critical (Major) compliance -</p>	<p>For Mosa POM, there are 4 types of workers housing which are IB Houses (17 units) for workers grade 5 and above, JG Houses (15 units) from 3 to 5, DLQ houses (35 units) for grade 1-2. There is evidence housing inspection has been done every 3 months and 06/01/2023, 01/04/2023 and 03/08/2023. Mosa clinic established near the POM compound. Primary school is available nearby which is Mosa Primary School, which is walking distances while for secondary school, kids need to travel to Kimbe town which Poinini Secondary School which 3kms and transportation has been provided for free using school buses. Water supplied by the management and managed by construction department. Drinking waters analysis has been done monthly basis and based on the report, sighted that there is no E. coli and coliform has been identified.</p> <p><u>Tamare Estate</u></p> <p>There are 3 types of workers housing in Tamare Estate which are IBK (7units), JGK (6units) and QLQ (21 units) in division A and B. As per interview, it has been confirmed adequate housing has been provided to all workers and sanitation available for each house. Water supplies through water bore has been maintained and treated by staff from construction department. There is one primary school which is oval primary school and the management provided transportation for free to the kids.</p> <p><u>Kapiura POM</u></p> <p>There are 3 types housing which classified into Double living quarter (DLQ), Intermediate Bachelor (IB) and Junior grade (JG). For education, there is elementary school has been established which utilizing community hall as a place of learning. Teacher has been provided by the management and teacher`s salary has been paid by the management itself. While for primary school, it located around 3km from the Kapiura POM which Kapiura Primary School and the management has provided free transport for transportation</p>	
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		<p>to school. There are 2 churches has been established which are for Roman catholic and United Church. There is one clinic in Kapiura POM housing compound where the management has appointed one nursing officer. There is also one health extension officer that has been appointed for Kapiura Complex which included other plantations. Water supplies has been extracted through water bore and analysisist has been done monthly basis. Housing inspection has been done on quarterly basis and sighted in the Housing repair & maintenance checklist, PF#29 and for year 2023, inspection done on 13/03/2023 and 07/06/2023 for DLQ houses (sample DLQ#1), 13/03/2023 and 06/06/2023 for JG house (sample JG#12) and for IB house conducted on 13/06/2023 and 13/03/2023 (sample IB#12)</p> <p><u>Rigula Estate</u></p> <p>There are 3 types of workers housing in Rigula Estate quarter living quarters (QLQ), 38units, Intermediate Bachelor (IB), 05units and Junior grade (JG), 07units. There is evidence that all housing has been maintained in good condition where line site inspection has been done on quarterly basis. There is 1 sundry shop available in the estate, however the sundry shop has been closed since 05/06/2023 and new tenant has been appointed on 07/08/2023. There are alternative for workers where the can go to Balini town where there is a supermarket which as just 4km from the housing compound. Workers can request for company’s transport to go to the supermarket. There is also elementary school that utilized community hall. There are football field and church in the estate compound. Water and electricity has been provided for free.</p> <p><u>Garu Estate</u></p> <p>Labour quarters located in 3 different area which are in Div 1,2 and 3 and there 3 different categories which are DLQ, double living quarters, IB,</p>	
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		<p>Intermediate Bachelor (IB), 05 units and Junior grade (JG). Line site inspection done every quarterly where for this year, it has been conducted on 04/01/2023, 06/04/2023 and 07/07/2023. Sundry shops is available where workers can purchase wet and dry food. Based on interview with the workers, the food is sufficient and affordable. Football field, volleyball court and basketball court are available as part of sport accommodations. Clinic is available and the services has been provided for free. For any severe treatment, there are ambulance available to transport patient to Mosa hospital. There are also elementary schools available with 3 teachers and there 3 building for that school. While for primary school, it is located around 5 km from the estates and the management provided free transport for the kids.</p> <p>Management plan to construct new housing to replace substandard housing and overcrowding quarters established in 15/03/2023 which 1,655 of workers housing with total PGK 374.98M has been allocated for period of 10 years.</p> <p>OFI raised to verify implementation on the next audit.</p> <p><u>Smallholders</u></p> <p>All smallholders that have plots for oil palm have obtained the land legally via CLUA or State Lease as stated above. Visit to all the sampled smallholder blocks confirmed that they have built traditional houses within the block and live there with their families and extended families. Availability of water and electricity depends on the area they are in as not all areas within the province has adequate access to water and electricity.</p> <p>As for the mini estates, interview with the workers confirmed that they stay in their own traditional houses which are located nearby the estates.</p>	
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<p>6.2.5</p>	<p>The unit of certification being the mill and Company operated plantations makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p><u>Kapiura POM</u></p> <p>Kapiura POM is located 1hour drive from Kimbe town and 1 and half hours for Biala town and usually workers will be travelling by bus or chartered lorry. The management has taken initiative to established on sundry shops for in the housing compound which has been tendered to external parties. As per site visit, the sundry shops sell dried food such as rice, tuna, coffee, sugar, and flour and wet food such as frozen meats, chicken, and fish. The management has made discussion with the tenant to set up ceiling price for good in the sundry shops considering profit and distance from the town and sighted in the NBPOL trade store monthly pricelist and has been monitored on monthly basis. As per site visit by auditor, confirmed that tenant is compliance with agreed ceiling prices.</p> <p><u>Rigula Estate</u></p> <p>There are 3 types of workers housing in Rigula Estate quarter living quarters (QLQ), 38units, Intermediate Bachelor (IB), 05units and Junior grade (JG), 07units. There is evidence that all housing has been maintained in good condition where line site inspection has been done on quarterly basis. There is 1 sundry shop available in the estate, however the sundry shop has been closed since 05/06/2023 and new tenant has been appointed on 07/08/2023. There are alternative for workers where the can go to Balini town where ther supermarket which as just 4km from the housing compound. There is also elementary school that utilized community hall. There are football field and church in the estate compound. Water and electricity has been provided for free.</p> <p><u>Garu Estate</u></p> <p>Labour quarters located in 3 different area which are in Div 1,2 and 3 and there 3 different categories which are DLQ, double living quarters, IB,</p>	<p>Complied</p>
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		<p>Intermediate Bachelor (IB), 05units and Junior grade (JG). Line site inspection done every quarterly where for this year, it has been conducted on 04/01/2023, 06/04/2023 and 07/07/2023. Sundry shops is available where workers can purchase wet and dry food. Football field, volleyball court and basketball court are available as part of sport accommodations. Clinic is available and the services has been provided for free. For any severe treatment, there are ambulance available to transport patient to Mosa hospital. There are also elementary schools available with 3 teachers and there 3 building for that school. While for primary school, its located around 5km from the estates and the management provided free transport for the kids.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: 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.</p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks¹. 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.</p> <p>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</p>	<p>Decent living wages (DLW) report, NBPOL-WNB is available conducted in year 2022 for financial year 2023 prepared by Diane Mandui Mirio, consultant from Nara Kain Wei Community Training and consultancy. As per report there is no national guideline for decent living wages for Papua New Guinean. The assessment for decent living wages conducted on participatory ways where total 997 workers has been interviewed and reference to RSPO Decent Living Wages Guidelines and Global Living Coalition Network (GCLN). As per assessment, average workers received average PGK62.75 per hour per workers. This included facilities provided by the management which are water/rubbish removal, medical treatment and housing maintenance. This is comparing to minimum wages of Papua New Guinean which are PGK3.71 for Grade 1 level 1 workers.</p>	<p>Complied</p>

	<p>wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage.</p> <p>Once the 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:</p> <ul style="list-style-type: none"> • 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 to choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>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.</p> <p>- Minor compliance</p>	<p>Minor nonconformities</p> <p>It was found that temporary workers were used for core works. Samples are as follows:</p> <p>Kumbango POM</p> <ol style="list-style-type: none"> 4. Worker AA, Recruited 23/01/2023, Kernel Station Operator 5. Worker BB, Recruited 23/01/2023, Oil Room Operator 6. Worker CC Recruited 23/01/2023, Effluent Pond 	Non-compliance

		<p>Kapiura POM</p> <p>3. Worker DD, Recruited 15/03/2023, Housing upkeep.</p> <p>4. Worker EE, recruited 26/06/2023, Housing upkeep</p>	
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Freedom of association and right to collective bargaining policy document in the" Employee rights & equal employment opportunities policy dated 12/072023 signed by Mohamed Azhaza Abdulaziz, General Manager, NBPOL-WNB and stated in policy that NBPOL-WNB will respect rights of all personnel to form/join trade unions and to bargain collectively. The policy has been established in 2 different languages which are English and Tok Pisin. As per verification, there is evidence that policy has been communicated and explained to all workers base on the training records and interview with the workers itself.</p> <p>Mosa POM: 21&22/07/2023 Tamare Estate: 24/04/2023 Kapiura POM: 10/07/2023 Rigule Estate: 20/06/2023</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p> <p>- Minor compliance -</p>	<p>Latest minutes meetings sighted which has been conducted on the 26/05/2023 with attendance on union representative and representative from human resources department. Issues highlighted as below.</p> <p>1) Long leave rate which has been reduced from PGK97.33 to PGK76.2 and unions request the management provide clear information on the rate different</p>	Complied

		<p>Action plan: The management will follow up the issues and circulate the document explaining the changes of long services leave rates.</p> <p>Implementation: There is evidence that the long leave issues has been resolve where it has been communicated to all the workers for each operating unit. Sighted document of communication which details up the explanation of the long leave rate.</p> <p>2) Risk allowance for employees working on risk zone sites- Union requested that employer who works at high-risk zone for special high-risk allowance.</p> <p>Action plan: Discussion between the human resources department on the request on the practicability of the allowance</p> <p>Implementation: Discussion has been made with human resources department, however the issues will be further application need to be done to the top management.</p> <p>3) Request for company to build standardized bus stops at Mosa main market.</p> <p>Action plan: The management will notify the construction department regards to bus stops improvement.</p> <p>Implementation: Progress of collection of quotations in progress and layout has been provided by the construction department.</p>	
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>As per interview with the president of trade union for NBPOL_WNB, it has been confirmed that there no interference by the management on formation and selection for workers representatives. Election will be done every 4 years and latest election has been done in year 2021.</p>	Complied
<p>Criterion 6.4: Children are not employed or exploited.</p>			

6.4.1	<p>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.</p> <p>- Minor compliance -</p>	<p>Policy for child protection has been documented in the document "Minimum age specification" version 03/09/2023 which clearly stated that young person has been defined who is age between 14 and below 18. Stated also that NBPOL as part of Sime Darby Plantations recognizes to protect the wellbeing of children and young people in line with national and international requirement. Stated also, any contractors will adhere the same policy and will not employ any persons under 18 years old. Sample of contract agreement taken and there is state prohibition to employ child labour in the checklist of contractor`s social& environmental responsibilities dated 10/11/2016. Sample taken for FFB transport contractor.</p>	Complied
6.4.2	<p>(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 which must be carried out by clinic or supervisory staff to be applied where other documentary evidence of date of birth is not available.</p> <p>- Critical (Major) compliance -</p>	<p>As per PNG, Employment Act No.54 in 1978, revised in 2001 stated young workers has been defined as 11 years old until 16 years old. However, as per NBPOL policy, recruitment of new workers only for people that above than 18 years old. Age screening procedure has been documented in the policy detail up in indicator 6.4.1 clause 3.0, where applicant needs to provide several documents as part of ages verification which are valid birth certificate, school certificates and letter from parent(s) confirming the date of birth, letter from the village court or district court. As per verification, there is evidence that ages screening has been done by each operating units and document available as evidence of ages verifications. It also has been further confirmed through list of workers which detail update joined and date of birth and interview with sample workers.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. Normally the minimum age for employment by the Company is 18 year however in certain circumstances such as school work experience, persons as young as 16 years may be employed. These persons are classified as Young Persons.</p> <p>- Critical (Major) compliance -</p>	<p>There are no young workers has been recruited in the NBPOL-WNB certification units as per stated in the policy for child protection has been documented in the document "Minimum age specification" version 03/09/2023 where NBPOL-WNB will not recruit any workers under the ages of 18 years old. It has been further confirmed has been done through workers personal files, list of workers and interview with sample workers.</p>	Complied

<p>6.4.4</p>	<p>The Company demonstrates communication about its “no child labour” policy and the negative effects of child labour through notices at workers’ housing compounds and Smallholder field days. It promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>NBPOL-WNB's policy against child labor is effectively communicated through various channels, including, but not limited to, the following:</p> <p>Inclusion in Supplier Contracts and Supplier Induction Programs: Suppliers are mandated to familiarize themselves with NBPOL-WNB's policy against child labor and incorporate it into their business activities when working with NBPOL-WNB.</p> <p>Distribution of Policy Booklets to Workers: Policy Booklets are provided to all workers, and these booklets are available in Tok Pisin, ensuring that the policy is accessible to a broad range of employees.</p> <p>Ongoing Awareness Programs for Workers: Continuous training and briefings are conducted at regular intervals to keep workers informed about company policies, including the stance against child labor.</p> <p>Child Labor Awareness During Field Days: Smallholders and independent estates receive ongoing awareness about the prohibition of child labor during field days. The Smallholder Grower Booklet (Growa Buklet) offered to smallholders contains information highlighting that child labor is not in compliance with international and PNG labor laws.</p> <p>Annual External Stakeholder Workshops: These workshops, held on an annual basis, serve as a platform to reinforce the company's policies, including the Human Rights Policy, among external stakeholders.</p>	<p>Complied</p>
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		<p>Display on Notice Boards at OPIC: NBPOL-WNB's policies, including the one concerning child labor, are posted on notice boards at the Oil Palm Industry Corporation (OPIC) for enhanced visibility and accessibility.</p> <p><u>Smallholders</u> The smallholders and Mini Estates management and workers are made aware on the no child labour policy during trainings and field days that are conducted for the blocks. Interview with the sampled growers and workers confirmed that no child labour is employed. There are no workers below the age of 18 employed by the smallholders or used to work in their blocks. Visit to the sampled fields further confirmed that here was no child labour in practice.</p>	
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. - Critical (Major) compliance -</p>	<p>NBPOL-WNB adopt sexual harassment policy and other harassment in the document "sexual harassment policy" dated 12/07/2023 signed by the general manager, Mr Azhazha Abdul Aziz. Stated in policy that the management is committed to maintained respectful for dignity for each individuals working environment. The management of NBPOL also will not tolerate with any sexual harassment or any other harassment regardless the position holds by the offender. The management encourage for any victims to report any incident to the management for the management to take next step of actions.</p> <p>Communication of the policy verified based on the training records provided to the auditors and has been further verified based on the interview with both male and female workers where they can demonstrate their understanding on the policy and aware what is sexual harassment and method to report any incident of harassment. Details of communication done as per below Mosa POM: 21&22/07/2023</p>	<p>Non-compliance</p>

		<p>Tamare Estate: 24/04/2023 Kapiura POM: 10/07/2023 Rigule Estate: 20/06/2023</p> <p>Nonetheless, it was found that the Domestic Violence Policy has not been adequately implemented based on the following evidence:</p> <p>Internal policy for sexual and all other forms of harassment and violence sighted in "Domestic violence policy" dated 12/07/2023 which stated, while women who experience domestic violence, the policy applies equally to men who need advice and support. In the support of this, it is NBPOL policy that anyone who experiencing or has experience domestic violence can raise in the knowledge that NBPOL will resolve the issue of matter effect.</p> <p>A rape incident occurred within the Kumbango POM housing compound involving a minor (15 years old) and was perpetrated by her uncle on the 13th of August 2022. The victim's mother filed a complaint on the 19th of August 2022, and sought to verify whether the security had informed the management about the situation, which they had not.</p> <p>Although the matter was raised with the security department, there is no indication that any investigation has taken place. Additionally, the management has not provided any guidance or assistance to the victim, contrary to the commitment outlined in the policy.</p> <p>Thus a non-conformity was assigned due to this lapse.</p> <p><u>Smallholders</u></p> <p>Interview with the sampled smallholders and mini estate management and workers confirms that the sexual harassment policy has been communicated to them where the smallholders and growers were able to explain the content of the policy, types of harassment and procedure on how to report</p>	
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		any harassment that may occur. The smallholders further responded that there have been no cases of harassment that occurred among them.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p>Documented in the document title "gender right policy" dated 12/07/2023 signed by the general manager, Mr Azhazha Abdul Aziz. The management of NBPOL-WNB is committed to protect reproductive rights for female workers. Stated also the management will take specific measure to ensure the commitment implemented through prohibition sanction, dismissal due to pregnancy and maternity leave, and to provide special protection to women during pregnancy in types of work proved to be harmful to them. Other than that, the management will ensure that will not allow pregnant workers pregnant and breastfeeding mothers to do any task dealing with chemical.</p> <p>As per verification, there evidence that there are no female workers handling chemical in the estate where all sprayers in the estate is male workers and female workers work as loose pickers, upkeep.</p> <p><u>Smallholders</u> SHA Department have conducted trainings on reproductive rights during the fields days to create awareness among the growers. Interview ith the sampled growers confirmed that they understand on their reproductive rights and that there are no restrictions.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and a procedure has been determined that identifies actions are taken to address the needs of them and their babies.</p> <p>- Minor compliance -</p>	<p>On general practice, assessment of new mothers is done through gathering of information with regards to the needs of the new mothers through face-to-face interview by trained clinic staff. Nonetheless, some lapses were found as non-conformity raised under Indicator 3.4.3 to minimise double dipping of findings.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p>	<p>Mechanism to make any complaint related to sexual harassment and other harassment outline in the sexual harassment policy document "Sexual harassment policy' dated 12/07/2023 signed by the general manager, Mr</p>	Complied

	<p>- Minor compliance -</p>	<p>Azhazha Abdul Aziz. Stated in the document that 1st level for reporting is to the operating unit’s manager, head of department, human resources, or gender committee, WEW in written and will be investigated and once found guilty will be dealt with under the discipline policy and procedure.</p> <p>Other than that, it has been documented in ‘Communication and consultation procedure’ dated 15/06/2023 signed by Mr Mohamed Azhaza Abdul Aziz, General Manager for NBPOL-WNB which stated that complainer can request to maintain anonymous and will not be divulged to other parties.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p>(C) All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>Note: where a Company has advanced money to an employee as a loan, this is to be regarded as a debt to the Company by the employee and a documented arrangement for repayment is to be established that is acceptable to both parties.</p> <p>Smallholder requirements:</p> <p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p><u>Retention of identity documents or passports</u></p> <p>A copy of identity documents retained for employment purpose and kept under individual files. No foreign or guest workers in NBPOL.</p> <p><u>Payment of recruitment fees</u></p> <p>No recruitment fees paid for employment. The method of recruitment of general labour and semi- skilled are from hearing of vacancies through word of mouth and putting up notice on notice board.</p> <p><u>Contract substitution</u></p> <p>No contract substitution observed. Clear job designation and scope of work written in the contract. No foreign or guest workers in NBPOL.</p> <p><u>Involuntary overtime</u></p> <p>Overtime is voluntary and must be approved in advance by the appropriate Manager. Exceptionally, this rule will be waived in an emergency where it is impracticable to obtain prior managerial approval</p>	<p>Complied</p>

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		<p><u>Lack of freedom of workers to resign, penalty for termination of employment and debt bondage</u></p> <p>Based on General Policies and Guidelines handbook 2010, employees are subject to give notice to terminate the contract. Notice periods for all Non-Executive staff are as follow:</p> <p>Grade 1-7: < 3 months service (1 day)</p> <p style="padding-left: 20px;">< than 1 year (1 week)</p> <p style="padding-left: 20px;">< less thank 5 years (2 weeks)</p> <p style="padding-left: 20px;">> 5 years of service (1 month)</p> <p>Debt bondage recorded in the payslip for food rations and sighted deduction consent has been confirmed with the workers during interview.</p> <p><u>Withholding of wages</u></p> <p>There are mandated deductions as required by the law of Papua New Guinea. Deductions such income tax and PSF @ Palm Supa Fund (AON), WNBGW (union fees) were paid on timely manner.</p> <p><u>Smallholders</u></p> <p>Interview with the sampled smallholders and mini estate growers and workers confirmed that all work is voluntary and in accordance with the contract agreements. Smallholders do not generally hire workers to work in the field as most of they do the work themselves. Mini estates on the other hand do hire workers from within the village or neighbouring villages to do the work in their block, abiding to the contract agreements. Interview with the sampled workers confirmed that they understood the requirement and there were no instances of the stated prohibitions being practiced.</p>	
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6.6.2	<p>(C) Where temporary or migrant workers are employed for seasonal or activity related periods of high demand, these are regarded as “casual” workers. A specific labour policy and procedures for casual workers are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Documented in the “Temporary Employment Policy” dated 12/07/2023 signed by general manager, Mohamed Azhaza Abdul Aziz. Temporary workers have been defined in the policy as a person that works minimum 88 hours per fortnight for a fixed short-term period according to their written contract which included seasonal labour. Process of recruiting temporary workers outline in the same document which mentioned that decision for recruitment based on assessment only if the works can` t be completed by current manpower. Requests need to be submitted to human resources department by completing all human resources documents which included medical examination, employment contract has been signed and orientation has been conducted. Once the contract expired as per agreed timeline stated in the contract agreement, the management can decided either to permanently recruited the workers or proceeds for terminations.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Each operating unit has their own OHS committee which consists of representatives from both management and workers. The committees hold a meeting on monthly basis and minutes of meeting were made available for verification. Based on the minutes, among the agenda discussed are as follows:</p> <ol style="list-style-type: none"> 1) Outstanding/in progress from previous minutes 2) Review of near miss 3) Review of incidents (including first aid& lost time cases) 4) Overview of safety inspections, risk assessment & safety permits 5) Review of PPE 6) Employee health status 7) Compound health & hygiene 8) Chemical handling and storage 9) First aid kits 	Non-compliance

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		<p>10) Emergency drills 11) New employee induction 12) Review of internal/external audits 13) Internal inspections 14) OH&S training 15) New business</p> <p>However, the evidence to show that the OSH Committee Meeting as frequent as stipulated in the NBPOL's Operational Safety Management Plan was not adequate, based on the following findings: For the year 2023, the evidence to show that Rigula Estate has been conducting their OSH Committee Meeting monthly as stipulated in the NBPOL's Operational Safety Management Plan was not adequate. Only two meetings were conducted at the point of this assessment i.e., March and May 2023. Thus, a non-conformity was assigned due to this lapse.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of 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 -</p>	<p>Accident of emergency procedure is presented in Operational Safety Management Plan for Plantation and Production Department under section 5 and 9. Flowcharts of emergency handling were displayed on notice boards at each operating units for reference. Additionally, the management also communicates the procedure during morning briefing and training. The organization charts of the emergency response team were established and displayed for information of the employees at various strategic places. The important telephone contact numbers were also provided therein. ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trained/competent personnel for First Aid were among the employees working as field staff or section leaders. The first aid boxes were also available at various workplaces at the mill and estates, workshops, and</p>	<p>Non-compliance</p>

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		<p>stores. The first aid box contents were monitored by the Health Extension Officer (HEO) on monthly basis. Records of accidents were documented in Injury Assessment Report (IAR) and submitted to the Sustainability Department for compilation.</p> <p>However, some of the assigned operatives trained in first aid were not present during the visit of the following operations:</p> <ul style="list-style-type: none"> iii) harvesting at Garu Estate (field no. GR200, Ave. B) iv) manual weeding at Garu Estate (field no. GT0800, Ave. 2) <p>Thus, a non-conformity was assigned due to this lapse.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, 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.</p> <p>- Critical (Major) compliance -</p>	<p>The management provides appropriate PPE to the employees in accordance with the WRA and SOP. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e., coverall, safety shoes, gum boots, mask, respirator, helmet, goggle, and gloves,), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with workers showed that the appropriate PPE was provided for free and worn accordingly.</p> <p>Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing were provided and well maintained.</p> <p>However, the following lapses were found:</p> <ul style="list-style-type: none"> i) At Rigula Estate, Field No. MU RG 700, Road 5, Ave. 5, a worker was seen to be doing the FFB loading work barefooted. ii) There have been a few spots of small fire occurred at Field No. MU RG 500, Road 5, Ave. 4 to 5, Rigula Estate during the field visit. Six herbicides spraying operators were assigned to put out the fire. However, none of them were wearing appropriate PPE such as closed 	<p>Non-compliance</p>

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		<p>shoes and long pants while putting out the fire. This is not in-line with the Agricultural Fire Fighting Procedure (doc. no.: SUST-05).</p> <p>iii) There was a chemical spraying operation at Malilimi Estate (Field No. MN02C, Ave. 1) done by two workers. However, it was observed that one of the workers did not go to the sanitation facility to cleanse himself after work.</p> <p>Thus, a non-conformity was assigned.</p>	
6.7.4	<p>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 national law or by the unit of certification where national law does not offer protection.</p> <p>- Minor compliance -</p>	<p>Should there be any medical care needed by the employees, clinics with certified person in-charge were provided at all the sampled estates. Based on site visits, all the clinics were well maintained and managed. NBPOL WNB is subscribing to a Life Insurance (Death Benefits) to cover the accident insurance for all their employees. Insurance claims are centrally managed by the Human Resource Department. Verification of sampled claims showed that the claims were generally made in appropriate manner.</p> <p>However, there had been an accident to a worker (Emp. ID 636501) at Numundo Oil Mill on 12/10/2021 (<i>but reported in the accident logbook 12/10/2022</i>). Based on the Injury Assessment Report (IAR), the company's clinic had classified the injury as Major and requires workers compensation. However, the IAR was not available at the company's Human Resource Department for further process. Thus, the status of whether or not the worker is eligible to get insurance compensation claim due to accident was undetermined. Thus, a non-conformity was assigned due to this lapse.</p>	Non-compliance
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of Lost Time Accident (LTA) metrics at the sampled operating units were documented in NBPOL WNM LTI Register and made available for verification. The RSPO's Lost Time Injury Frequency Rate (LTIFR) metrics was also used to record the number of lost time injuries and total hours worked for the period of Jan – Dec of 2022.</p>	Complied
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.			

<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>Smallholder requirements: Organization managing the smallholders to manage IPM program for smallholders. - Critical (Major) compliance -</p>	<p>There are no changes for IPM plan where the Integrated Pest Management Plan was implemented as per Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. IPM plan revised by PNG OPRA Head of Entomology on dated 01/06/2020. The IPM strategies were:</p> <ol style="list-style-type: none"> 1) Understanding of economic threshold 2) Understanding of pest and beneficial organism biology 3) Routine monitoring of pest and beneficial 4) Biological control 5) Physical control 6) Cultural control 7) Precise and target application of pesticides <p>The IPM was conducted when there is sign/evidence of pest attack in the plantations. The sampled estates have effectively implemented their IPM programme as outlined in the procedure. Among the evidence of implementation sighted during the site visits are:</p> <ul style="list-style-type: none"> • Planting of beneficial plants such as Antigonon leptopus, Turnera ulmifolia, and Cassia cobanensis. Apart from that, since Euphorbia heterophylla grows naturally in PNG, the estates keep the plants as one of the beneficial plants. • Overspray of herbicides is not a practice in WNB. It was sighted that soft vegetation was maintained in the field and herbicides application is limited to circle and strip only. <p><u>Smallholders</u> NBPOL have adapted the Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. Integrated Pest Management Plan; dated 01/06/2020 for the implementation of IPM among the smallholders. IPM Trainings are</p>	<p>Complied</p>
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		<p>provided to all smallholders and mini estates during the Field Days that are conducted. Sighted the training records on IPM for the smallholders.</p> <ol style="list-style-type: none"> 1. Integrated Pest management Training conducted for Rapuri Community on 24/07/23. 2. Awareness on IPM conducted at Galilo VOP on 17/07/2023. <p>Interview with the sampled growers concluded that they are aware on the IPM programs and requirements. They have adapted practices such as use of dimehypo for insecticides.</p>	
7.1.2	<p>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. Any imported species must first be approved in PNG by National Agriculture Quarantine and Inspection Authority (NAQIA) and in the Solomon Islands by Biosecurity Solomon Islands (BSI).</p> <p>- Minor compliance -</p>	<p>There was no evidence that any species referenced in the Global Invasive Species Database and CABI.org were used for the management of IPM in the sampled estates.</p>	Complied
7.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There was no evidence that fire was used for pest control at the sampled estates. Moreover, there has been no pest outbreak at WNB for the past several years, hence the unavailability of pesticides stock at all the sampled estates.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The justification of all pesticides used is documented in NBPOL's Plantation Management Guidelines, Pesticide Practices (NBPOL-EI-MG 030, revision 8, dated 20/04/2017). The guideline outlines the types of chemicals used for specific targets.</p>	Complied
7.2.2	<p>(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.</p>	<p>Records of pesticides used at all the sampled estates are maintained and made available for verification. The records are updated monthly and separated based on the type of pesticides used. Among the information</p>	Complied

	<p>Smallholder requirements: Organization managing the smallholders to maintain records of herbicide issue to smallholders. - Critical (Major) compliance -</p>	<p>available in the records is location of application, sprayed Ha, applied volume and application rate. The records are accumulated to be viewed on a to date figure for the year. The records were updated on monthly basis.</p> <p><u>Smallholders</u> Chemicals are issued by NBPOL mainly for the controls of pesticides. The record of chemicals issued was available under Pest Treatment Monitory Sheet 2023, under smallholder affairs department which was available for verification.</p>	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. Smallholder requirements: Organization managing the smallholders to manage IPM for smallholders. - Critical (Major) compliance -</p>	<p>The plan to minimise the use of pesticides is guided by the Pesticide Practices (NBPOL-EI-MG 030). All the sampled estates have been using the glyphosate-based herbicides and Class I herbicides such as paraquat, is no longer in use. The use glyphosate is mixed with wet and stick substance to have more effective weeding results. The pesticides used was based on the New Guinea Oil Palm Research Association (PNGOPRA) Inc. IPM plan. Pest Recommendation (PestRec) need to be submitted to the PNGOPRA.</p> <p><u>Smallholders</u> NBPOL have adapted the Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. Integrated Pest Management Plan; dated 01/06/2020 for the implementation of IPM among the smallholders. IPM Trainings are provided to all smallholders and mini estates during the Field Days that are conducted. Sighted the training records on IPM for the smallholders.</p> <ol style="list-style-type: none"> 1. Integrated Pest management Training conducted for Rapuri Community on 24/07/23. 2. Awareness on IPM conducted at Galilo VOP on 17/07/2023. <p>Interview with the sampled growers concluded that they are aware on the IPM programs and requirements. They have adapted practices such as use of dimehypo for insecticide and treatment of Ganoderma.</p>	Complied

7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There was no prophylactic use of pesticides at all the sampled estates. This was confirmed through verification of chemicals stores visit, records of chemical issuance, documented Agro Chemical Classification and SAN Standard Requirements, and interview with workers and smallholders.</p>	Complied
7.2.5	<p>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.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>Smallholder requirements:</p> <p>Smallholders not using pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Smallholders to follow the policies of the organization managing the smallholders</p> <p>- Minor compliance -</p>	<p>There was no evidence of pesticides that categorized as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat were used at the sampled estates. This was confirmed through verification of chemicals stores visit, records of chemical issuance, documented Agro Chemical Classification and SAN Standard Requirements, and interview with workers and smallholders.</p> <p><u>Smallholders</u></p> <p>Interview with the sampled smallholders and mini estate growers indicated that they avoid using chemicals as they prefer to conduct manual brushing to eradicate the weeds in their blocks. Those that do use chemical application obtain the chemicals from NBPOL which provide them with Class 3 and Class 4 chemicals for weeding purposes. The application of chemicals in the blocks are in accordance with the guidelines and SOPs of NBPOL.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in</p>	<p>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers,</p>	Complied

	<p>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.</p> <p>Smallholder requirements:</p> <p>Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements.</p> <p>- Critical (Major) compliance -</p>	<p>and herbicides sprayers. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification at all the sampled estates.</p> <p><u>Smallholders</u></p> <p>Smallholders and mini estate growers that wish to use chemicals on their plots are to obtain a certificate from OPIC that enables them to purchase chemicals and apply them at their plots. To obtain the certificate, they must undergo certain trainings (A Smallholder Management Training Guideline – Pesticide Practice) and competencies assessment by OPIC personals. During the site visit to the sampled smallholders and mini estate growers, the certificate was available for those smallholders that use chemicals in their plots. As per interview with the smallholder, there is evidence that they can demonstrate their understanding on chemical handling, storage, and application.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>Smallholder requirements:</p> <p>The requirements fully applicable to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>During the visit to the chemical stores at the sampled estates, it was noticed that all pesticides and chemicals were stored in designated stores labelled as Chemical Stores. The stores were equipped with locks to prevent unauthorised personnel from entering. Appropriate PPE needs to be worn before entering the stores. Hazard signage and signage requiring the wearing of PPE were visibly displayed. Inside the chemical stores it was sighted that all chemicals were arranged and labelled on the shelves. A bin card was available for each pesticide and chemical to monitor the incoming and outgoing of the chemicals. Remaining solutions that were brought back after being issued were also stored in the stores in a separate area. The walling of the stores was equipped with wire mesh windows to ensure good ventilation. Apart from that, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	Complied

		<p><u>Smallholders</u></p> <p>Interview with the smallholders indicated that majority of them do not use chemicals or pesticides for field operations and resort to manual brushing of the weeds. Mainly mini estate and some smallholders occasionally do use chemicals to eradicate weeds. The chemicals are obtained from NBPOL-WNB. The chemicals are temporarily stored at chemicals sheds in the smallholder and mini estates plots. The sheds were noticed to be locked with proper ventilation. Chemical container was properly stacked, and the original labels were maintained. They had provided emergency shower in case of emergencies.</p>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. Empty pesticide containers may be used for pre-mixing spray solution before transport to the plantation for use by sprayers. In this case they must have visual identification such as painted lines around them.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Minor compliance -</p>	<p>20 litres empty chemicals containers are normally reused to contain pre-mixed herbicides. Smaller size and worn-out empty containers were triple rinsed and punctured or shredded before disposing them at the designated landfill. Those containers that are used to contain pre-mixed herbicides were painted with red lines around them as an indication.</p> <p><u>Smallholders</u></p> <p>Chemical Containers are recycled and used for pre-mixing spray solutions before transporting them to the blocks for spraying purposes. The original labels are removed and painted with indicators stating that the contacts are hazardous. Broken or unused chemical containers are cut into half and punctured before disposing them at the designated Chemical Pits at the block. Chemical Pits were visited at the sampled mini estates and smallholder's blocks and found to be well managed and with adequate signage and barricade.</p>	Complied
7.2.9	<p>(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</p>	<p>There was no aerial spraying conducted at in NBPOL WNB and all smallholders' plots.</p>	Complied

	<p>relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>		
<p>7.2.10</p>	<p>(C) Specific bi-annual medical surveillance for pesticide operators handling organophosphate insecticides, and documented action to treat related health conditions, is demonstrated.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>	<p>The sampled estates have not used any organophosphate insecticides for a long time since no pest outbreak reported. Nonetheless, the medical surveillance for sprayers and herbicide operators were conducted once in every six months at the company’s clinics. It is one of the prerequisites to determine whether a spraying operator is fit for the job. After passing the medical test, a “Pesticide Fitness Card” (a.k.a Green Card) will be issued to certify that the operator is fit. The Pesticide Fitness has the information about name of the operator, date of medical test and due date of medical test. In such way, the management can easily monitor to ensure the frequency of medical test is not missed. Based on verification of Pesticide Fitness Cards of the sampled estates, it was found that all the cards were still valid at the point of this visit. The test reports were also well maintained by the estates for verification. Among the parameters tested were skin, pulse, blood pressure, vision, hearing, cardiovascular, respiratory system, gastro-intestinal system, nervous system, haemoglobin, and urinalysis to name a few.</p> <p><u>Smallholders</u> Mini Estates and Smallholders that apply pesticides within their block have undergone bi-annual medical surveillance for their pesticide operators. Interview with the sprayers further confirmed that they have been sent for medical surveillances and are provided with the medical results upon it being available. The costs for medical surveillance are absorbed by the management and not deducted from the pesticide operators.</p>	<p>Complied</p>

		<ol style="list-style-type: none"> 1. Akami Estate have sent 5 of its pesticide operators and the pesticide supervisor for medical surveillance on 12/05/2023. The results indicated that the supervisor and 1 worker were unfit, and the rest were fit to work. Interview with the workers confirmed that they have been provided with the results and the workers declared unfit have been provided with alternative work. Records of medical surveillance were available for verification during the assessment. 2. John Siwisika Estate have sent 2 of its pesticide operators for the medical surveillance. The results of the medical surveillance stated that 1 worker was unfit and has been since provided alternative work. Records were available for verification. 	
7.2.11	<p>(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.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>	<p>Based on verification of employment records and interview of the spraying operators at the sampled estates, there was no persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions was assigned to undertake any work with pesticides.</p> <p><u>Smallholders</u> Generally female workers work as loose fruit collectors. Interview with the sampled female smallholders indicated that they were aware they are not to work with pesticides if they were pregnant or breast feeding. The smallholders also ensure that children below the age of 18 do not handle chemicals. Generally, children below the age of 18 are not employed by the smallholders. Smallholders that have undergone Medical Surveillance and obtained negative results have been advised not to conduct pesticides related work and have been offered alternative work.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>Smallholder requirements:</p> <p>Smallholders must demonstrate planned waste management and disposal by disposing of waste products in a designated waste pit.</p> <p>- Minor compliance -</p>	<p>NBPOL-WNB, Environmental Instruction and Waste Management Plan, EI-02, revision no. 11 dated 1/7/2021. The framework of the waste management plan is based on the 3R + D principle; reduce, reuse recycle and disposal. In line with established policy on environmental management to ensure the efficient use of resources and minimization of waste generation and disposal. Related requirements for environmental compliance as such:</p> <p>i) NBPOL’s Environmental permit under Section 65 of the Environmental Act 2000, permit no. EP-L2B (411) valid for 25 years until 3/4/2037.</p> <p>ii) Environmental Code of Practice for Sanitary Landfill Sites, Papua New Guinea 2001</p> <p>Type of waste generated, and the management plan summarized as per the following:</p> <table border="1" data-bbox="1048 791 1930 1361"> <thead> <tr> <th>Sources</th> <th>Type of waste</th> <th>Disposal plan</th> </tr> </thead> <tbody> <tr> <td>Household</td> <td>Garden waste, domestic & food waste, recyclables</td> <td>Landfilling & composting</td> </tr> <tr> <td>Industrial activities</td> <td>Industrial waste – fuel filters, obsolete parts,</td> <td>Landfilling – hydrocarbon pit</td> </tr> <tr> <td>Workshop/garage</td> <td>Batteries, tyres, scrap metal, steel</td> <td>Landfilling</td> </tr> <tr> <td>Clinic/aid post</td> <td>Medical waste</td> <td>Incineration</td> </tr> <tr> <td>Agricultural activities</td> <td>Fertilizer bags, chemical containers, used PPE</td> <td>Landfilling (chemical-after triple rinsed and pierced/pesticides pit)</td> </tr> <tr> <td>Mill wastewater</td> <td>Palm Oil Mill Effluent (POME)</td> <td>Open aerated lagoon & land application</td> </tr> </tbody> </table>	Sources	Type of waste	Disposal plan	Household	Garden waste, domestic & food waste, recyclables	Landfilling & composting	Industrial activities	Industrial waste – fuel filters, obsolete parts,	Landfilling – hydrocarbon pit	Workshop/garage	Batteries, tyres, scrap metal, steel	Landfilling	Clinic/aid post	Medical waste	Incineration	Agricultural activities	Fertilizer bags, chemical containers, used PPE	Landfilling (chemical-after triple rinsed and pierced/pesticides pit)	Mill wastewater	Palm Oil Mill Effluent (POME)	Open aerated lagoon & land application	Complied
Sources	Type of waste	Disposal plan																						
Household	Garden waste, domestic & food waste, recyclables	Landfilling & composting																						
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Workshop/garage	Batteries, tyres, scrap metal, steel	Landfilling																						
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Mill wastewater	Palm Oil Mill Effluent (POME)	Open aerated lagoon & land application																						

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		Hexane/Chemical (laboratory)	Used/spent chemical	Burn as per technical requirements.	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators. Guidance: With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and compostable waste. Company procedures must state how these waste streams are managed.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Minor compliance -</p>	<p><u>Smallholders</u> Smallholder Affairs Department together with OPIC have conducted regular Field Day and trainings for all the smallholders. Among the trainings provided includes Waste management and Rubbish Pit Management. Visit to the smallholder’s sites indicated that they have well maintained rubbish pits that have been well barricaded. Separate Chemical Pit was also available for disposal of used chemical containers and Hydrocarbon Pits for the disposal of hydrocarbons.</p> <p>NBPOL-WNB, Environmental Instruction and Waste Management Plan, EI-02, revision no. 11 dated 1/7/2021. Waste disposal strategies is to dispose into sanitary landfill based on the established plan. The landfill location placement is in accordance with the NBPOL’s environmental permit, EP-L2(411), commencement date: 4/04/2012 under section 31; Landfill. The location of landfill shall be not less 100 meters from the nearest surface water or settlement for disposal of non-hazardous domestic solid waste and for the disposal of industrial waste deriving from operations. The landfill shall be designed in accordance with the DEC Environmental Code of Practice for Sanitary Landfill Sites, DEC 2001.</p> <p>Each operating units have their own incinerator to burn medical waste (soft medical waste and sharps). Incineration of the medical waste recorded in the logbooklog book (2-3 times per month.) As for Garu Plantation, the latest incineration was last recorded on 9/8/23 (2.8 kgs of medical waste)</p>			Complied
		Waste type	Quantity	Estate	

		<table border="1"> <tr> <td data-bbox="1043 360 1328 475">Refuse</td> <td data-bbox="1328 360 1630 475">August 2023: 47 loads (store), 56 loads (garden)</td> <td data-bbox="1630 360 1928 475" rowspan="2">Kumbango Estate</td> </tr> <tr> <td data-bbox="1043 475 1328 560">Medical waste</td> <td data-bbox="1328 475 1630 560">July 2023: 22.4 kg incinerated</td> </tr> </table>	Refuse	August 2023: 47 loads (store), 56 loads (garden)	Kumbango Estate	Medical waste	July 2023: 22.4 kg incinerated	
Refuse	August 2023: 47 loads (store), 56 loads (garden)	Kumbango Estate						
Medical waste	July 2023: 22.4 kg incinerated							
7.3.3	<p>Open fire is not used for waste disposal by the Unit of Certification.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Minor compliance -</p>	<p>As per the requirement under DEC Environmental Code of Practice for Sanitary Landfill Sites, DEC 2001:</p> <ul style="list-style-type: none"> - <i>Disposing of refuse anywhere outside the premise is illegal and that spot fines are imposed in indiscriminate dumping outside the land fill site.</i> - <i>Instruction to refrain from setting fire for refuse within the premise.</i> <p><u>Smallholders</u> Interview with the smallholders and mini estates have confirmed that they understand that they do not use fire for waste disposal. They understand that waste is to be segregated and disposed at the designated pits within the blocks. Visit to the sampled blocks further confirmed that waste is segregated and disposed into the chemical pits, garden waste pits, and</p>	Complied					

		hydrocarbon waste pits. There were no traces of fire being used for waste disposal at the sampled smallholders plots.	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>Smallholder requirements: Smallholders to implement good agriculture practices as communicated through extension services delivered by organization that is managing the smallholders.</p> <p>- Minor compliance -</p>	<p>NBPOL has established its Plantation Management Guidelines to be adhered for good agriculture practices. In managing the soil fertility to optimise yield and minimise environmental impacts, it is covered under various chapters in the guidelines i.e.:</p> <ul style="list-style-type: none"> • Agro 001 Leaf Sampling and Processing, issue 1, dated 01/01/2008 • Agro 002 Soil sampling in NBPOL plantations, issue 1, dated 01/01/2013 • Agro 003 Leaf Sampling and Processing Flow Chart, issue 1, dated 25/08/2011 • Agro 004 Fertiliser Sampling, issue 9, dated 11/07/2015 • MG 04 Upkeep, issue 7, dated 23/10/2018 • MG 16 Composting, issue 4, dated 01/06/2014 <p><u>Smallholders</u> The Smallholder Affairs Department together with OPIC and PNGOPRA regularly educates the smallholders to implement good agricultural practices in line with the SOPs that have been cascaded to the smallholders. This is a continuous process done via Field Days and Field inspections. During the visit to the smallholder plots, various GAP has been noticed to be implemented by the smallholders such as buffer zone establishments, frond stacking, pruning maintenance, harvesting and FFB standards, zero burning and waste management among others.</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. Tissue testing is conducted annually to determine fertiliser requirements for the following year. Soil testing is carried out at replant.</p>	<p>Periodic tissue and soil sampling is carried out annually guided by the following procedures:</p> <ol style="list-style-type: none"> 1) Agro 001 Leaf Sampling and Processing, issue 1, dated 01/01/2008 2) Agro 002 Soil sampling in NBPOL plantations, issue 1, dated 01/01/2013 	Complied

	<p>Guidance: Smallholders are provided with access to test results applicable to the Company Management Unit doses to their block.</p> <p>Smallholder requirements:</p> <p>Organization that is managing the smallholders to take tissue samples from representative Smallholders annually.</p> <p>- Minor compliance -</p>	<p>3) Agro 003 Leaf Sampling and Processing Flow Chart, issue 1, dated 25/08/2011</p> <p>The last leaf sampling analysis at the sampled estates were carried out in mid-2022 by an accredited third-party laboratory. Based on the report, among the nutrient contents analysed were Nitrogen, Phosphorus, Potassium, Sulphur, Calcium, Magnesium, Sodium, Iron, Manganese, Zinc, Copper, Boron, and Chloride. The data was then used as a basis for recommendation of fertiliser application in 2023.</p> <p>Soil sampling for all the sampled estates was last conducted in September 2018 by an accredited third-party laboratory. Analysis reports were well maintained for verification. The soil sampling is done once in every five years.</p> <p><u>Smallholders</u></p> <p>PNGOPRA conducts annual tissue samples from the representative smallholders block and sampled mini estates. The samples are processed and sent to AAR in Malaysia to undergo analysis. The results are the sent back to PNGOPRA. The results are shared with the SHA Departments and smallholders are provided with access to the results. Verified the "2022 Hoskins Project Leaf Tissue Analysis Report" by AAAR dated 26/10/2022.</p>	
7.4.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The nutrient recycling strategy of NBPOL is documented and the latest version is dated 15/12/2020. Among the recyclable nutrient identified are EFB, palm fronds, fibre, treated POME, Geotube solids, dried pond solids, and boiler ash. Due to the distance from the mills, not all the estates are applying EFB mulching in the field. EFB application records were well maintained by the estates which are applying the EFB mulching. Based on verification of the records for Kumbango and Garu estates, among the information available in the records was tonnage of EFB and area of application.</p>	Complied

7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>Smallholder requirements: Organization that is managing the smallholders to maintain records of fertiliser distribution.</p> <p>- Minor compliance -</p>	<p>The estates maintained the record of the fertiliser application in the fields in order to monitor and ensure the application is carried out as recommended by the PNG OPRA. Among the information available in the records was field number, date of application and type & quantity of fertilisers. Based on the agronomist recommendations, the average dosage of fertiliser for the visited estates is around 5 kg/palm/year. The dosage depends on the type of fertilizer. The types of fertilisers were mostly of straight fertilisers.</p> <p><u>Smallholders</u> Fertilizers are provided to the smallholders and mini estates based on the request. It is entirely up to the growers to decide if they want to apply fertilisers in their blocks. The fertiliser prices vary every month and is communicated to the growers via display at notice boards and through SHA Department staffs. Records of Fertilizer delivery to the smallholders and Mini Estates were available and verified, recorded in "Fertilizer Distribution Records from January – July 2023".</p>	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Each estate of NBPOL WNB has its individual map, Soil Map and Slope Map in appropriate scales. Based on the maps, there are no marginal or fragile soils identified at the sampled estates. The main soil present at the sampled estates were of Andaquepts, Vitrandepts, Dystropepts, Troporthents types to name a few.</p>	Complied
7.5.2	<p>There is no extensive replanting of oil palm on steep terrain.</p> <p>Smallholder requirements: Smallholders do not plant on unsuitable slopes. Organization managing the smallholders to advise on slope suitability after</p>	<p>NBPOL WNB has established their slope maps for all the estates. Based on the maps, generally the sampled estates have flat to undulating terrain. Based on map verification and site visit, there was no extensive replanting of oil palm on steep terrain.</p>	Complied

	consideration of gradient, soil type, harvesting safety and other relevant issue. - Minor compliance -	<u>Smallholders</u> The Smallholder Affairs Office conduct Pre-Planting Inspection at the smallholder plots that have been selected for replanting. A Planting Approval Form – Replant is raised where the Smallholder Affairs officers assess the smallholder’s site on Topography suitability. The Planting Approval Form – Replant was available for verification. The Office then decides on areas to be left out from replanting due to steep slopes.	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There was no evidence of new planting at the sampled estates and smallholder plots.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
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 -	There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB’s GIS & Mapping Unit.	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 new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB’s GIS & Mapping Unit. Based on the maps, there was no soil identified as marginal or fragile soils.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB’s GIS & Mapping Unit.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			

7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -</p>	<p>Out of the five sampled estates, only Tamare Estate has existing plantation on peat. Nonetheless, there is no new planting on peat after 15/11/2018. Thus, this indicator is not applicable.</p>	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -</p>	<p>The existing plantation on peat is managed according to NBPOL WNB's Ove and Tamare Peat Soils Water Management Plan, June 2020. The inventory of peat was documented using the RSPO Peat Inventory Template which was submitted to RSPO Secretariat in 2020. It was made available for verification. NBPOL WNB had sent the inventory to Sime Darby Plantation Berhad for compilation and SDPB had sent the compiled inventory to RSPO on 30/10/2023 to fulfil the RSPO's request announced on 19/09/2022 (refer https://rspo.org/second-submission-of-rspo-peat-inventory/). This is verifiable through email correspondence between NBPOL WNB, SDPB, and RSPO.</p>	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>Tamare Estate monitors their subsidence of peat using subsidence monitoring poles (piezometers) which are planted in many places of the peat areas. The readings are taken once a month for the planted area and once in two months for the unplanted area. The readings are then recorded in the "Soil Subsidence Monitoring Form". Based on crosschecking at the sampled piezometers (pole #5 & #7), the data taken were found to be accurate.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>Guided by the NBPOL WNB's Ove and Tamare Peat Soils Water Management Plan, June 2020, the water level of the peat area was maintained at between 40-60 cm below ground. This was achieved by maintaining the field drain stoppers installed.</p>	Complied
7.7.5	<p>(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</p>	<p>There has been no replanting on peat after 15/11/2018 at Tamare Estate. The last replanting on peat was in 2017. Thus, this indicator is not applicable.</p>	Not Applicable

	<p>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.</p> <p>PROCEDURAL NOTE:</p> <p>Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p>PROCEDURAL NOTE:</p> <p>PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(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 (2018) and associated audit guidance.</p>	<p>The existing plantation on peat at Tamare Estate is managed according to NBPOL WNB's Ove and Tamare Peat Soils Water Management Plan, June 2020 which was developed with reference to the 'RSPO Manual on Best</p>	<p>Complied</p>

	- Critical (Major) compliance -	Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018).					
7.7.7	<p>(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 (2018) and associated audit guidance</p> <p>- Critical (Major) compliance -</p>	The unplanted and set-aside peatlands in the managed area at Tamare Estate are protected as conservation area. Based on site visit, there was drainage, roads or powerlines observed. The area is left undeveloped, and no sign of encroachment seen. Signage to indicate the area is protected was erected at few places.	Complied				
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.							
7.8.1	<p>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:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plan for NBPOL-WNB under Water and Natural Resources Management Plan, EI-03, rev:08, dated 13/06/21. Under domestic water quality monitoring requirements, Conservation Environmental Protection Authority (CEPA) Environmental Permit EP-L2 (411);</p> <table border="1" data-bbox="1048 979 1921 1145"> <thead> <tr> <th>Sector</th> <th>Condition description</th> </tr> </thead> <tbody> <tr> <td>Domestic water</td> <td>Water quality to comply with Public (Drinking) Water Quality Standard on monthly basis.</td> </tr> </tbody> </table> <p>Workers have no restriction and adequate access to clean water where the company has provided treated water extracted either from bore-well or surface water. As per the Environmental Permit (EP-L2(411) requirements under Annex B: Schedule of Extraction & Discharge Points, Description and Allowable Volume. The monitoring carried out on monthly basis as required under the environmental permit. Example of analysis results carried out by NBPOL as per the following:</p>	Sector	Condition description	Domestic water	Water quality to comply with Public (Drinking) Water Quality Standard on monthly basis.	Complied
Sector	Condition description						
Domestic water	Water quality to comply with Public (Drinking) Water Quality Standard on monthly basis.						

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		<p><u>Rigula Mini Estate</u> (EP97 – surface water for public distribution and water supply)</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>July 2023 (ref: 274/23)</th> <th>Maximum Permissible Amount</th> </tr> </thead> <tbody> <tr> <td>Turbidity, NTU</td> <td>10.8</td> <td>25</td> </tr> <tr> <td>Total Solid, mg/L</td> <td>220</td> <td>1500</td> </tr> <tr> <td>Total coliform, CFU</td> <td>2</td> <td>< 3, if E. Coli is 0</td> </tr> <tr> <td>E. Coli, CFU</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>*TNTN: To Numerous To Count, CFU > 100</p> <p><u>Numundo POM</u> (EP97 – surface water for public distribution and water supply)</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>July 2023 (ref: 274/23)</th> <th>Maximum Permissible Amount</th> </tr> </thead> <tbody> <tr> <td>Turbidity, NTU</td> <td>11.7</td> <td>25</td> </tr> <tr> <td>Total Solid, mg/L</td> <td>180</td> <td>1500</td> </tr> <tr> <td>Total coliform, CFU</td> <td>0</td> <td>< 3, if E. Coli is 0</td> </tr> <tr> <td>E. Coli, CFU</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>*TNTN: Too Numerous to Count, CFU > 100</p>	Parameter	July 2023 (ref: 274/23)	Maximum Permissible Amount	Turbidity, NTU	10.8	25	Total Solid, mg/L	220	1500	Total coliform, CFU	2	< 3, if E. Coli is 0	E. Coli, CFU	0	0	Parameter	July 2023 (ref: 274/23)	Maximum Permissible Amount	Turbidity, NTU	11.7	25	Total Solid, mg/L	180	1500	Total coliform, CFU	0	< 3, if E. Coli is 0	E. Coli, CFU	0	0	
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		<p>SHEQ incident form, dated 7/6/23 has included the environmental incident in June 2023. Very high total coliform and e. coli with the value of > 100 CFU @ TNTC recorded with reference to laboratory report dated 14/6/23, ref: 203/23 for NOM compound (HG/04 & EP21). Notification made to the construction department was sent on 16/06/23 for bore pump service and water line blasting. The issue has been resolved and improvement of water quality reported based July 2023 analysis results.</p> <p><u>Kumbango Estate</u> (EP73 – surface water for public distribution and water supply)</p> <table border="1" data-bbox="1048 718 1861 1066"> <thead> <tr> <th>Parameter</th> <th>July 2023 (ref: 261/23)</th> <th>Maximum Permissible Amount</th> </tr> </thead> <tbody> <tr> <td>Turbidity, NTU</td> <td>11.3</td> <td>25</td> </tr> <tr> <td>Total Solid, mg/L</td> <td>160</td> <td>1500</td> </tr> <tr> <td>Total coliform, CFU</td> <td>0</td> <td>< 3, if E. Coli is 0</td> </tr> <tr> <td>E. Coli, CFU</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>*TNTN: Too Numerous to Count, CFU > 100</p> <p>Pending repair work to replace a new bore pump requested to construction department. Temporary measures – request to supply treated clean water from Mosa Compound on weekly basis. Refer to notification (ref:8000198073) issued on 5/08/2023 for refill of water tank (18,000 litre).</p>	Parameter	July 2023 (ref: 261/23)	Maximum Permissible Amount	Turbidity, NTU	11.3	25	Total Solid, mg/L	160	1500	Total coliform, CFU	0	< 3, if E. Coli is 0	E. Coli, CFU	0	0	
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7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer and other Annex E – Riparian Buffer Widths for Agricultural Development under Environmental Permit [EP-L2 (411)] and incorporated under Environmental Instruction Water and Natural</p>	Complied															

	<p>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.</p> <p>Smallholder requirements:</p> <p>Smallholders must protect water courses and wetlands by not polluting with rubbish or other waste.</p> <p>- Critical (Major) compliance -</p>	<p>Resource Management Plan (EI-03), rev:8 dated 13/06/2021. The main objectives of the Natural Resource management Plan are to protect the area that has conservation value and maintaining balances between oil palm development and ecological integrity. During the site visit at the sampled estates, it was verified that the management have a well-established buffer along the rivers and creeks. The management have erected signages prohibiting of operational activities along the buffers.</p> <p><u>Smallholders</u></p> <p>During the visit to the smallholders and independent estates' rivers and creeks indicated that the rivers and creeks were well established with appropriate buffers. Interview with the smallholders and independent estate managements indicated that they are well trained and aware on the importance of ensuring proper buffers and the prohibition of operational activities along the buffers especially agrochemicals and fertilizer applications. There was no evidence that rubbish or waste were polluted in the rivers and creeks. Furthermore, rivers and creeks are source of water for consumption and cleaning and washing activities among the communities therefore they ensure they keep the water source clean.</p>													
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Under environmental permit [EP-L2 (411)], parameter limit set for both surface water discharge and land discharge which to be carried out on monthly basis. Limits for the parameters as shown below:</p> <table border="1" data-bbox="1048 1123 1924 1385"> <thead> <tr> <th colspan="3">Environmental Impact Point, EIP Maximum Permissible Limit for Effluent Discharge</th> </tr> <tr> <th>Parameter</th> <th>Surface Water Discharge</th> <th>Land Discharge</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>5-9</td> <td>5-9</td> </tr> <tr> <td>Total Solid</td> <td>1500</td> <td>3000</td> </tr> </tbody> </table>	Environmental Impact Point, EIP Maximum Permissible Limit for Effluent Discharge			Parameter	Surface Water Discharge	Land Discharge	pH	5-9	5-9	Total Solid	1500	3000	Complied
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Parameter	Surface Water Discharge	Land Discharge													
pH	5-9	5-9													
Total Solid	1500	3000													

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		Total Dissolved Solid	1000	2000	
		Total Suspended Solid	500	1000	
		Oil and Grease	50	50	
		BOD ₅	90	4000	
		Example of analysis results for effluent discharge and EIP point for NBPOL mills as per below.			
		<u>Numundo POM</u>			
		Method of discharge is waterways and monthly analysis results for the last 2 months summarized as per following:			
		Parameter	July report 2023, ref: 274/23 dated 5/8/23	June report 2023, ref: 237/23 dated 11/7/23	EIP Maximum Permissible Limit
		pH	7.4	7	5-9
		Total Solid	170	240	1500
Total Dissolved Solid	150	220	1000		
Total Suspended Solid	20	18	500		
Oil and Grease	10.5	18.5	50		
BOD ₅	4	4	90		

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		<p><u>Kumbango POM</u></p> <p>Method of discharge is waterways and monthly analysis results for the last 2 months summarized as per following:</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>July 2023, report ref: 243/23 dated 27/7/23</th> <th>June 2023, report ref: 235/23 dated 27/6/23</th> <th>EIP Maximum Permissible Limit</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>7.3</td> <td>7.3</td> <td>5-9</td> </tr> <tr> <td>Total Solid</td> <td>680</td> <td>590</td> <td>1500</td> </tr> <tr> <td>Total Dissolved Solid</td> <td>660</td> <td>520</td> <td>1000</td> </tr> <tr> <td>Total Suspended Solid</td> <td>20</td> <td>70</td> <td>500</td> </tr> <tr> <td>Oil and Grease</td> <td>15</td> <td>17.5</td> <td>50</td> </tr> <tr> <td>BOD₅</td> <td>14</td> <td>38</td> <td>90</td> </tr> </tbody> </table> <p>Effluent analysis report demonstrated that the overall BOD results are generally meeting the discharge limits (final discharge an EIP limit). Occasionally, when the results exceeded the limits, the mill takes the initiative to investigate the root cause and appropriate action plans are being carried out. The investigation report and corrective actions taken are documented in E-SHEQ001 Incident Form and were available for verification for reports that have exceed the limits.</p>	Parameter	July 2023, report ref: 243/23 dated 27/7/23	June 2023, report ref: 235/23 dated 27/6/23	EIP Maximum Permissible Limit	pH	7.3	7.3	5-9	Total Solid	680	590	1500	Total Dissolved Solid	660	520	1000	Total Suspended Solid	20	70	500	Oil and Grease	15	17.5	50	BOD ₅	14	38	90	
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Water consumptions at all mills are monitored by using flowmeters. Based on the records, the sampled consumptions are as follows:</p> <table border="1" data-bbox="1048 443 1924 791"> <thead> <tr> <th rowspan="2">Mill</th> <th colspan="2">m³ per tonne FFB</th> </tr> <tr> <th>2022</th> <th>2023 (to date)</th> </tr> </thead> <tbody> <tr> <td>Mosa Oil Mill</td> <td>1.18</td> <td>0.93</td> </tr> <tr> <td>Kapuiria Oil Mill</td> <td>1.26</td> <td>1.13</td> </tr> <tr> <td>Waraston Oil Mill</td> <td>1.75</td> <td>2.47</td> </tr> <tr> <td>Numundo Oil Mill</td> <td>1.8</td> <td>1.83</td> </tr> <tr> <td>Kumbango Oil Mill</td> <td>1.75</td> <td>2.47</td> </tr> </tbody> </table>	Mill	m ³ per tonne FFB		2022	2023 (to date)	Mosa Oil Mill	1.18	0.93	Kapuiria Oil Mill	1.26	1.13	Waraston Oil Mill	1.75	2.47	Numundo Oil Mill	1.8	1.83	Kumbango Oil Mill	1.75	2.47	Complied
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Kumbango Oil Mill	1.75	2.47																					

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

7.9.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported.</p> <p>- Minor compliance -</p>	<p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for the financial year 2022 and 2023. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt CPO. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel.</p> <p>The electricity energy monitoring based on CPO produced tabulated as shown below:</p> <p><u>Numondo Oil Mill</u></p> <table border="1" data-bbox="1048 1321 1912 1391"> <thead> <tr> <th colspan="2">Energy Monitoring</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Turbine (kWh)</td> <td>2,671,857</td> <td>2,653,004</td> </tr> </tbody> </table>	Energy Monitoring		2022	2023	1	Turbine (kWh)	2,671,857	2,653,004	Complied
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<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>																															
7.10.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4. Detail of GHG calculation can be found under appendix B and reported for each palm oil mill.</p>	Complied																												
7.10.2	<p>(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).</p>	<p>Not applicable since no new development by the certification unit.</p>	Not Applicable																												

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	- Critical (Major) compliance -		
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored</p> <p>- Critical (Major) compliance -</p>	An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Identification of Potential Source of GHG Emission and GHG Reduction Plan is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. Among the Potential Source of GHG Emission identified such as Palm Oil Mill Effluent (POME), Diesel Usage, Electricity Usage, Chemical Usage and Generator Set. All pollutants are identified through environmental aspect register and plans to reduce or minimize are compiled in the Continuous Improvement Plan 2014-2025.	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	For replanting operation, the management is guided by Plantation Management Guidelines, Replant Practices [NBPOL – EI - MG 01B, rev. 7, dated 05/2016]. Based on the procedure, felled palms should be neatly stacked into straight lines. The procedure is in line with the Sime Darby Plantation Group Responsible Agriculture Charter under clause 3.2.5 stated – “Zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measures within a reasonable radius beyond our operational boundaries”.	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data [ref.: https://simedarbyplantation.com/who-we-are/sime-darby-plantation-worldwide/hotspot-dashboard/]. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. Regarding fire prevention WNB is driven by NBPOL Environmental Policy 2017, ver. 3. The commitment to zero burning for land preparation is stated in the policy.	Complied

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		<p>WNB has also established the Agriculture Fire Fighting Procedure, [SUST-05, issue 1, dated 01/07/2020] as a reference in firefighting.</p> <p>Process flow for fire incident reporting Incident occurrence > SDP hotspot alert team identification > to notify OU > incident details investigated by OU > immediate site verification by OU > OU to report verification status using Fire Hotspot Internal Report (FHIR) > information with geo-tagged photo > reply to hotspot alert team.</p> <p>Sample of incident notification received from FHIR, dated 17/7/2023 at GPS coordinate (-5.48590, 15.08940), Numundo Estate. Investigation done by onsite team and concluded that the fire initiated by local which involving 0.1 ha of estate’s area.</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The sampled estates have organized meetings with the adjacent stakeholders which were mainly villages and smallholders with regards to fire prevention and control measure as a mean of engagement. For example, fire prevention at estate boundary and buffer encroachment was carried out by smallholder team on 7/8/23.</p>	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) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12

The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.

The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.

High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards. Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).

<p>The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
7.12.1	<p>(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.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and land clearing since 15 November 2018. This indicator is not applicable.</p> <p>Previous Land Clearing done in NBPOL WNB has not affected nor damaged any primary forest or areas protected as HCVs. The management has identified areas for new planting are undergoing the process of obtaining approval from RSPO. Nevertheless, there are no new planting identified during this audit. NBPOL has established the NBPOL WNB established Habitat Management Plan, Landscape Overview, Version 3, July 2023 has been used as guidance for HCV management of all company operated Plantations and the various HCV classifications that exist within the owned (State Land) or leased (Customary Land) boundary under Government and Industry Protected Area.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a 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.</p> <p>7.12.2b 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.</p> <p>PROCEDURAL NOTE:</p>	<p>HCV assessments have been established in NBPOL WNB, classified by group estates and individual estates which included in the company wide Habitat Management Plan (HMP) entitled as Habitat Management Plans Landscape Overview, Version 3, July 2023.</p> <p>Additionally, NBPOL WNB has established guidance documents for HCV & Conservation covering all company operated Plantations and the various HCV classifications that exist within the owned (State Land) or leased (Customary Land) boundary under Government and Industry Protected Area. Group plantation HMPs reviewed as per the following:</p> <ul style="list-style-type: none"> i) Habitat Management Plans for Mosa Group, Issue 3, dated July 2023. ii) Habitat Management Plans for Malilimi Group, Issue 3, dated July 2023. iii) Habitat Management Plans Kapuira Group, issue 3 dated July 2023. iv) Habitat Management Plans Silovuti Group, issue 3 dated July 2023 	Complied

	<p>For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <p>- Critical (Major) compliance -</p>	<p>v) Habitat Management Plans Talasea Group, issue 3 dated July 2023</p> <p>For the sampled estates, HCV identification by category summarized as below:</p> <table border="1" data-bbox="1048 475 1924 1086"> <thead> <tr> <th>Plantation</th> <th>Location of HCV</th> <th>HCV classification</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Tamare Estate</td> <td>Tamare Swamp Parcel 1</td> <td>HCV 1,3 & 4</td> </tr> <tr> <td>Tamare Swamp Parcel 2</td> <td>HCV 1,3 & 4</td> </tr> <tr> <td>Riparian buffer zones</td> <td>HCV 4</td> </tr> <tr> <td rowspan="4">Rigula Estate</td> <td>Rigula hills</td> <td>HCV 1 & 4</td> </tr> <tr> <td>Rigula Mosaic</td> <td>HCV 1 & 4</td> </tr> <tr> <td>Pokili WMA</td> <td>HCV 1,4 & 5</td> </tr> <tr> <td>Riparian buffer zones</td> <td>HCV 4</td> </tr> <tr> <td rowspan="3">Garu Estate</td> <td>Garu Buffer</td> <td>HCV 1,3 & 4</td> </tr> <tr> <td>Garu WMA</td> <td>HCV 1,3,4 & 5</td> </tr> <tr> <td>Riparian buffer zones</td> <td>HCV 4</td> </tr> </tbody> </table> <p>No new land clearing (in existing plantations or new plantings) after 15 November 2018 within NBPOL-WNB concession area.</p>	Plantation	Location of HCV	HCV classification	Tamare Estate	Tamare Swamp Parcel 1	HCV 1,3 & 4	Tamare Swamp Parcel 2	HCV 1,3 & 4	Riparian buffer zones	HCV 4	Rigula Estate	Rigula hills	HCV 1 & 4	Rigula Mosaic	HCV 1 & 4	Pokili WMA	HCV 1,4 & 5	Riparian buffer zones	HCV 4	Garu Estate	Garu Buffer	HCV 1,3 & 4	Garu WMA	HCV 1,3,4 & 5	Riparian buffer zones	HCV 4	
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	Riparian buffer zones	HCV 4																											
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi- stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>No new planting within NBPOL WNB after 15/11/2018. Hence the HFCL within HFCC is not applicable for this audit.</p>	Not Applicable																										

	<p>PROCEDURAL NOTE:</p> <p>There shall be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development shall be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land/ plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p> <p>- Critical (Major) compliance -</p>		
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peat land and other conservation areas within Company managed land 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) that may result from the actions of the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>The NBPOL Habitat Management Plan, Version 3, July 2023 has been established as a guidance for HCV management plan. NBPOL WNB has established guidance documents for HCV & Conservation covering all company operated Plantations and the various HCV classifications that exist within the owned (State Land) or leased (Customary Land) boundary under Government and Industry Protected Area. Group plantation HMPs latest revision verified as per the following:</p> <ul style="list-style-type: none"> i) Habitat Management Plans for Mosa Group, Issue 3, dated July 2023. ii) Habitat Management Plans for Malilimi Group, Issue 3, dated July 2023. iii) Habitat Management Plans Kapuira Group, issue 3 dated July 2023. iv) Habitat Management Plans Silovuti Group, issue 3 dated July 2023 v) Habitat Management Plans Talasea Group, issue 3 dated July 2023 <p>HCV inspection reports and forest integrity assessments were made available for verification to confirm the proper implementation of the management plan. Sighted the Quarterly Buffer Zones Inspection Program – 2022 and 2023 for the sampled estates available for verification.</p>	Complied
7.12.5	<p>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</p>	<p>There is no new planting after 15/11/2018 within the certification unit.</p>	Not Applicable

	<p>evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>		
<p>7.12.6</p>	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>Smallholder requirements:</p> <p>Organization managing the smallholders to educate and support Smallholders through field days and visits to Smallholder blocks as part of their routine extension activities.</p> <p>- Minor compliance -</p>	<p>The RTE species status is included in the Habitat Management plan of each group plantation. The forest integrity assessment and periodic HCV inspection served the purpose to ensure that there is no encroachment and violation on RTE protection. NBPOL has also established the Flora and Fauna Species ver. 2 dated March 2019 to further identified the potentials RTE. The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Sighted at several strategic places in the estates visited such as office compound, muster ground, housing area and HCV area, signage on prohibition of capture, harm, collect or kill RTE species are erected. The estate continues to enhance the workers awareness on the RTE species through training as sighted in the training records as follows:</p> <ol style="list-style-type: none"> 1. Environment, Buffer Zone, HCV and RTE species and Environmental Policy Training dated 14/06/2023 at Kumbango Plantation. 2. Buffer Zone and RTE Species training dated 16/06/2023 at Garu Plantation. <p><u>Smallholders</u></p> <p>RTE awareness training was provided by NBPOL-WNB. Other than training, awareness through pictorial is published on the notice board and available during verification at the smallholder’s sites. Interview with the sampled smallholders and independent estates indicated that they are aware of the prohibition of capturing, harming, collecting, or killing RTE species that are within their operation areas. Records of RTE awareness trainings were available for verification.</p>	<p>Complied</p>

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		<ol style="list-style-type: none"> 1. Buffer zone and RTE Training conducted at Talasea Division – Garu & Kambili VOP on 05/07/2023. 2. Training on RTE Species and Buffer Zone at Siki Division – Siki LSS conducted on 05/07/2023. 3. Training on RTE Species and Buffer Zone at Buvusi Division conducted on 04/05/2023. 4. Training on RTE Species and Buffer Zone at Salelubu Division – Marapu VOP conducted on 12/06/2023 	
7.12.7	<p>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.</p> <p>- Minor compliance -</p>	<p>There was no new planting after 15/11/2018 identified that does not have a prior HCV assessment. However, for the current operations, the HCV and RTE species status are included in the Habitat Management plan of each area (e.g., Southern Gabuna Landscape). The forest integrity assessment and periodic HCV inspection served the purpose to ensure that there is no encroachment and violation on RTE protection. NBPOL has also established the Flora and Fauna Species ver. 2 dated March 2019 to further identified the potentials RTE. For example, at Kumbango Estate buffer zone inspection and sighting were carried out on quarterly basis; 17/02/2023 and 16/05/2023.</p>	Complied
7.12.8	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Land Clearing that have been done since November 2005 in NBPOL WNB have all included an HCV-HCSA assessment. As for this audit there were no land clearing or new planting within the sampled plantations.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Mosa 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 data include CPO produced, PK Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2022** for **Mosa POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-0.47
PK	-0.47

Extraction	%
OER	22.49
KER	6.24

Production	t/yr
FFB Process	294,822.60
CPO Produced	66,319.13
PK Produced	18,396.62

Land Use	Ha
OP Planted Area	66,421.86
OP Planted on peat	950.59
Conservation (forested)	7,458.30
Conservation (non-forested)	0
Total	74,830.75

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	73,627.09	0.55	0	0	14,145.2	0	87,772.84	0.55
CO ₂ Emission from fertilizer	3,017.78	0.02	0	0	284.95	0	3,302.75	0.02
NO ₂ Emission	3,435.15	0.02	0	0	369.57	0	3,804.74	0.02
Fuel Consumption	3,841.33	0.03	0	0	2410.67	0	6,252.03	0.03
Peat Oxidation	1,998.72	0.01	0	0	0	0	1998.72	0.01
Sink								
Crop Sequestration	-52,614.94	-0.39	0	0	- 100,665.87	0	-153,280.81	-0.39
Conservation Sequestration	-239.72	0	0	0	0	0	-239.72	0
Total	33,065.42	-0.39	0	0	- 83,455.47	0	-50,390.06	-0.39

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	36,714.3	0.12
Fuel Consumption	1847.27	0.1
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	38,561.57	0

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	50
Divert to methane captured (flaring) (%)	23
Divert to methane captured (energy generation) (%)	27

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The GHG emissions that were produced in **2022** for **Kapuira 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 data include CPO produced, PK Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2022** for **Kapuira POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.56
PK	0.56

Extraction	%
OER	23.50
KER	5.90

Production	t/yr
FFB Process	278,821.99
CPO Produced	65,515.74
PK Produced	16462.84

Land Use	Ha
OP Planted Area	41,363.85
OP Planted on peat	0
Conservation (forested)	3,152.60
Conservation (non-forested)	0
Total	44,516.45

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	90,008.69	0.42	0	0	5,482.53	0	95,491.22	0.55
CO ₂ Emission from fertilizer	5,3012.16	0.02	0	0	0	0	5,302.16	0.02
NO ₂ Emission	5,717.91	0.03	0	0	0	0	5,717.91	0.02
Fuel Consumption	3,812.46	0.02	0	0	934.35	0	4,746.81	0.03
Peat Oxidation	0	0	0	0	0	0	1998.72	0.01
Sink								
Crop Sequestration	-79,070	-0.37	0	0	- 39,024.27	0	-118,094.27	-0.37
Conservation Sequestration	0	0	0	0	0	0	-5,232.59	0
Total	25,771.22	0.12	0	0	- 32,607.38	0	-12,068.75	0.12

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	54,653.83	0.20
Fuel Consumption	2,916.84	0.01
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	57,570.67	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

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The GHG emissions that were produced in **2022** for **Waraston 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 data include CPO produced, PK Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2022** for **Waraston POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.45
PK	1.45

Extraction	%
OER	20.86
KER	6.33

Production	t/yr
FFB Process	125,553.32
CPO Produced	26,189.63
PK Produced	7,953.46

Land Use	Ha
OP Planted Area	61,094.91
OP Planted on peat	950.59
Conservation (forested)	6,120.86
Conservation (non-forested)	0
Total	68,166.36

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	84,225.80	0.92	0	0	3,011.30	0.09	87,237.10	0.55
CO ₂ Emission from fertilizer	2,091.57	0.02	0	0	0	0	2,091.57	0.02
NO ₂ Emission	2,566.28	0.03	0	0	0	0	2,566.28	0.02
Fuel Consumption	3,248.87	0.04	0	0	513.20	0.02	3,762.07	0.03
Peat Oxidation	2589.24	0.04	0	0	0	0	2,589.24	0.01
Sink								
Crop Sequestration	-79,070	-0.37	0	0	-21,434.19	0	-68,395.75	-0.37
Conservation Sequestration	0	0	0	0	0	0	-6,734.67	0
Total	25,771.22	0.12	0	0	-17,909.70	0	23,115.83	0.12

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	24,610.58	0.20
Fuel Consumption	1,884.93	0.02
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	26,495.51	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

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The GHG emissions that were produced in **2022** for **Numundo 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 data include CPO produced, PK Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2022** for **Numundo POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.30
PK	2.30

Extraction	%
OER	23.14
KER	6.72

Production	t/yr
FFB Process	236,851.00
CPO Produced	54,799
PK Produced	15,913.1

Land Use	Ha
OP Planted Area	57,625.01
OP Planted on peat	950.59
Conservation (forested)	6,475.70
Conservation (non-forested)	0
Total	65,051.30

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	191,752.09	0.90	0	0	2,132.76	0	193,884.85	0.09
CO ₂ Emission from fertilizer	5,409.53	0.03	0	0	42.96	0	5,452.50	0.03
NO ₂ Emission	10,702.80	0.06	0	0	55.72	0	10,968.52	0.06
Fuel Consumption	7,392.70	0.03	0	0	363.47	0	7,756.17	0.03
Peat Oxidation	42,843.68	0.02	0	0	0	0	42,843.68	0.02
Sink								
Crop Sequestration	-105,200.73	-0.49	0	0	-15,180.79	0	-120,381.52	-0.37
Conservation Sequestration	-27,377.00	-0.13	0	0	0	0	-27,377.00	0
Total	126,534.07	0.06	0	0	- 12,585.88	0	113,948.19	0.12

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	46,426.81	0.20
Fuel Consumption	2,293.51	0.01
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	48,720.32	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

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The GHG emissions that were produced in **2022** for **Kumbango 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 data include CPO produced, PK Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2022** for **Kumbango POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-0.44
PK	-0.44

Extraction	%
OER	21.80
KER	6.27

Production	t/yr
FFB Process	283,144.79
CPO Produced	61,713.85
PK Produced	17,766.55

Land Use	Ha
OP Planted Area	66,421.86
OP Planted on peat	950.59
Conservation (forested)	7,458.30
Conservation (non-forested)	0
Total	74,830.75

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	93,157.11	0.57	0	0	12,604.50	0	105,761.61	0.57
CO ₂ Emission from fertilizer	1,122.86	0.01	0	0	253.91	0	1,376.78	0.01
NO ₂ Emission	1,164.54	0.01	0	0	329.32	0	1,493.86	0.01
Fuel Consumption	1,085.07	0.01	0	0	934.35	0	3,140.71	0.01
Peat Oxidation	0	0	0	0	0	0	4,470.63	0
Sink								
Crop Sequestration	-69,928.28	-0.50	0	0	-89,717.90	0	-118,094.27	-0.37
Conservation Sequestration	-817.91	-0.01	0	0	0	0	-239.72	0
Total	30,254.02	0.22	0	0	-74,474.53	0	-6,836.16	0.12

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	7,220.80	0.03
Fuel Consumption	2,379.08	0.01
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	9,599.87	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

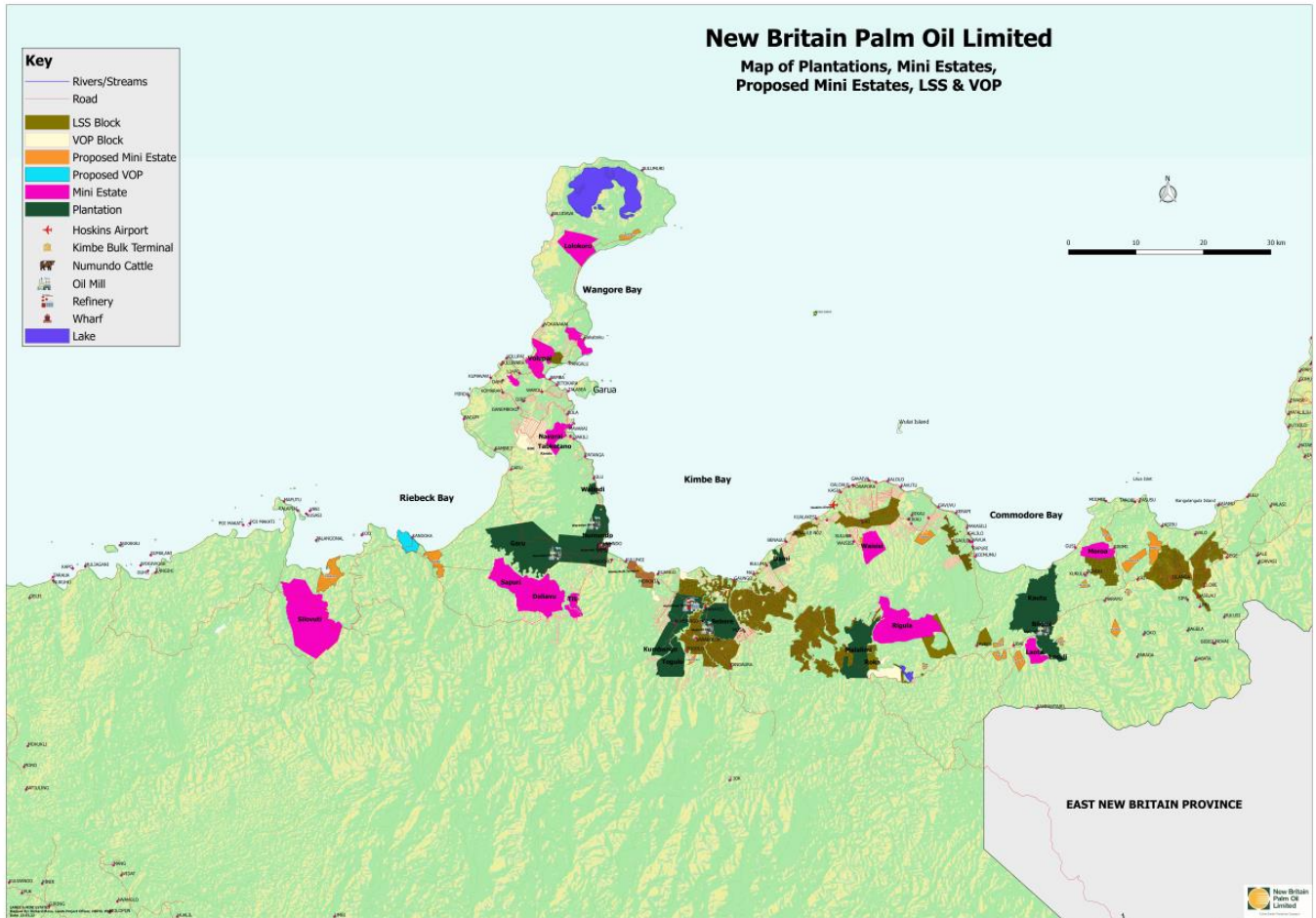
Emissions	tCO₂e
PK from own mill	-33,319.86
PK from other source	47,568.06
Fuel Consumptions	3,013.65
Total Crusher emissions	17,261.85

*This mill has no kernel crusher operation.

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

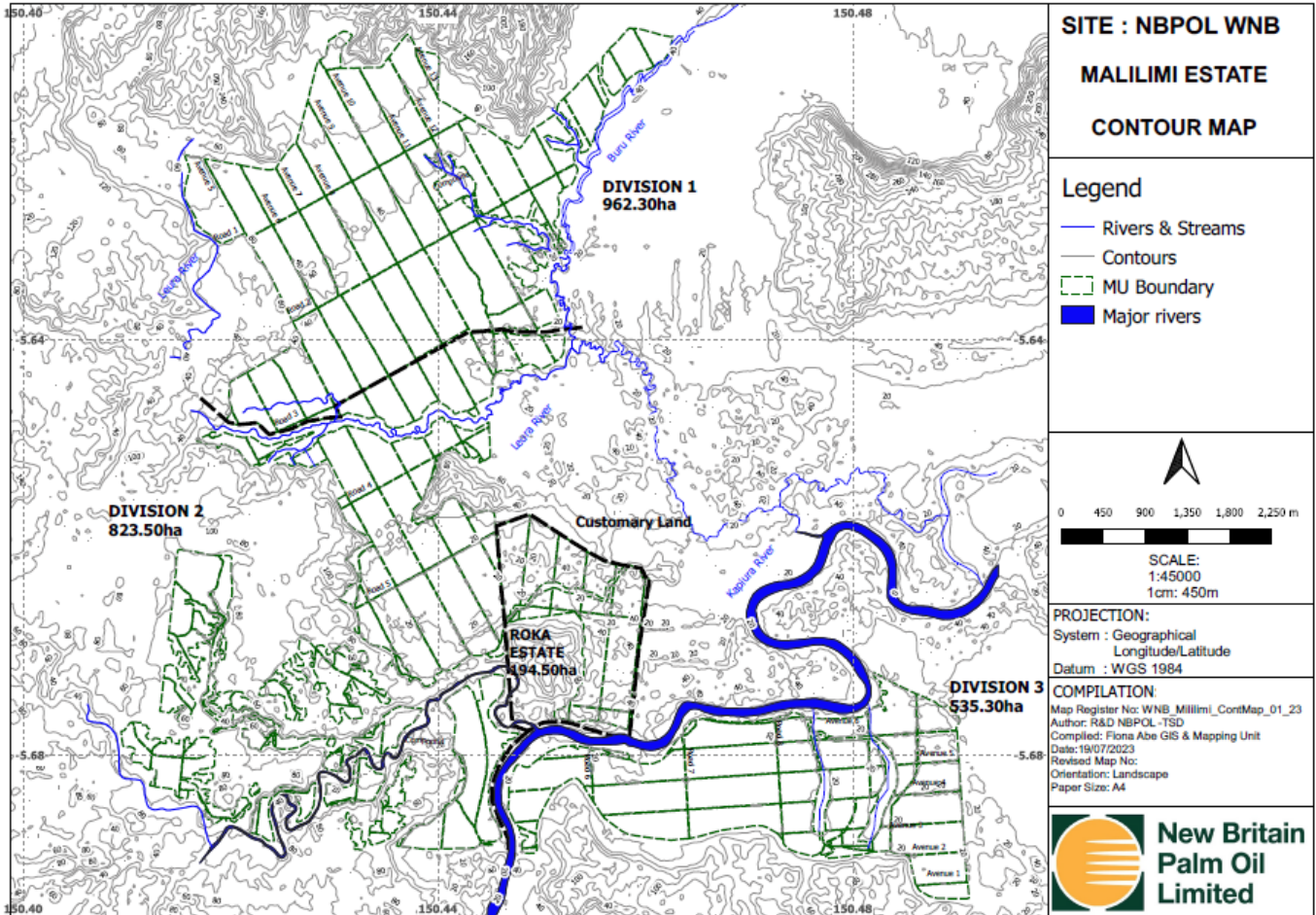
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases



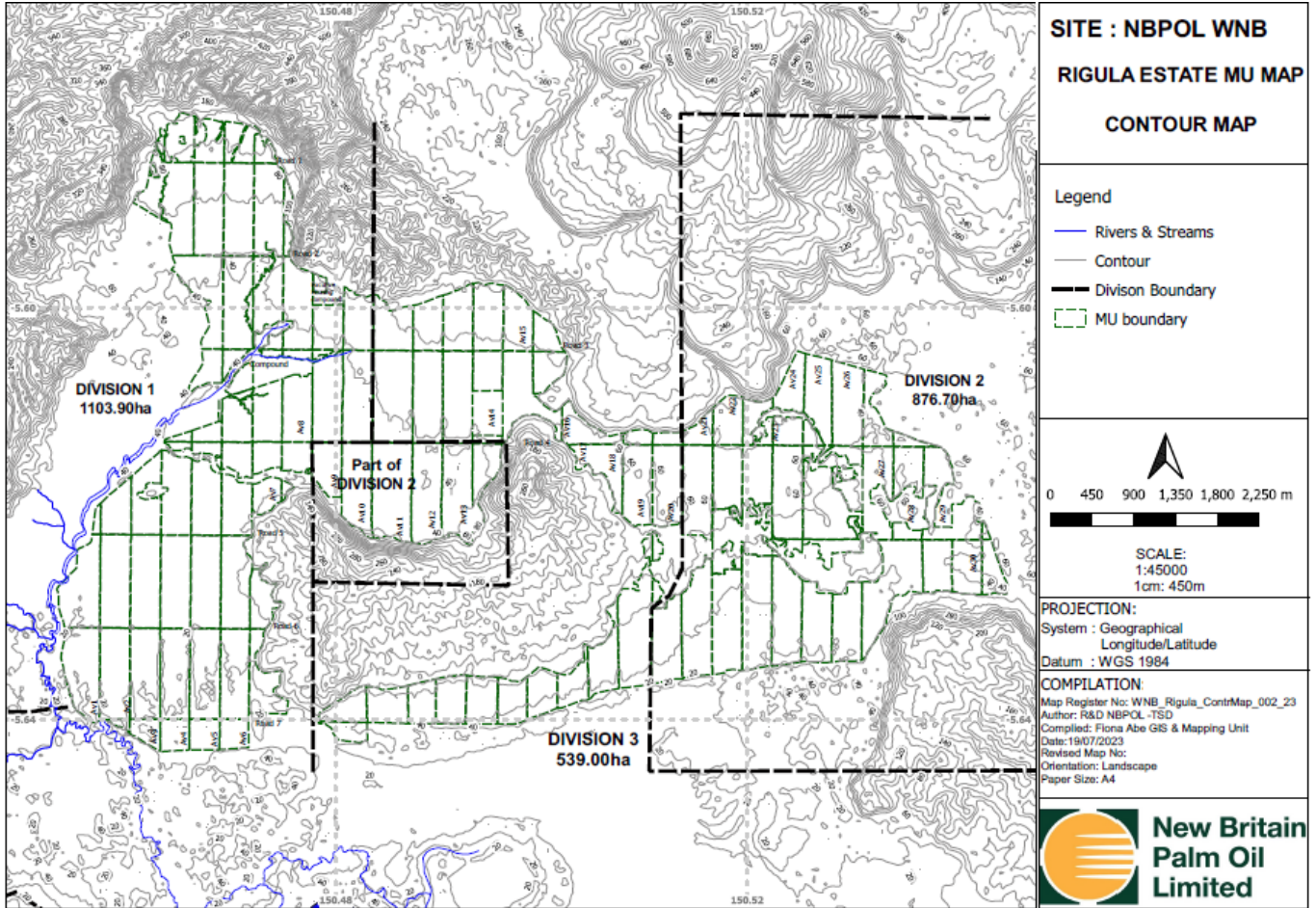
Appendix D: Estate Field Map

Malilimi Estate

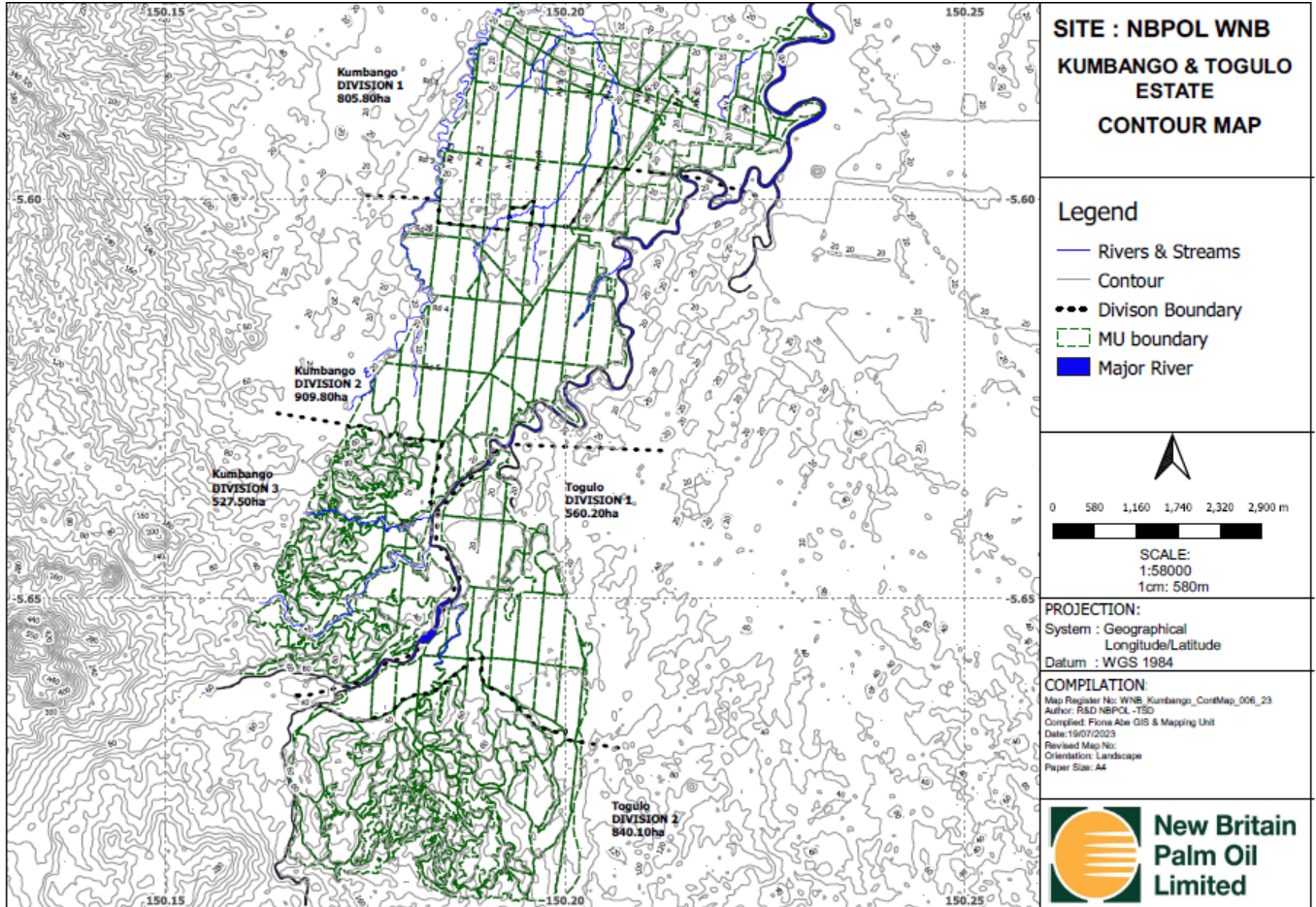


Note: This map remains the property of NBPOL. Any use of the map outside of NBPOL - Sime Darby Plantations is prohibited.

Rigula Estate

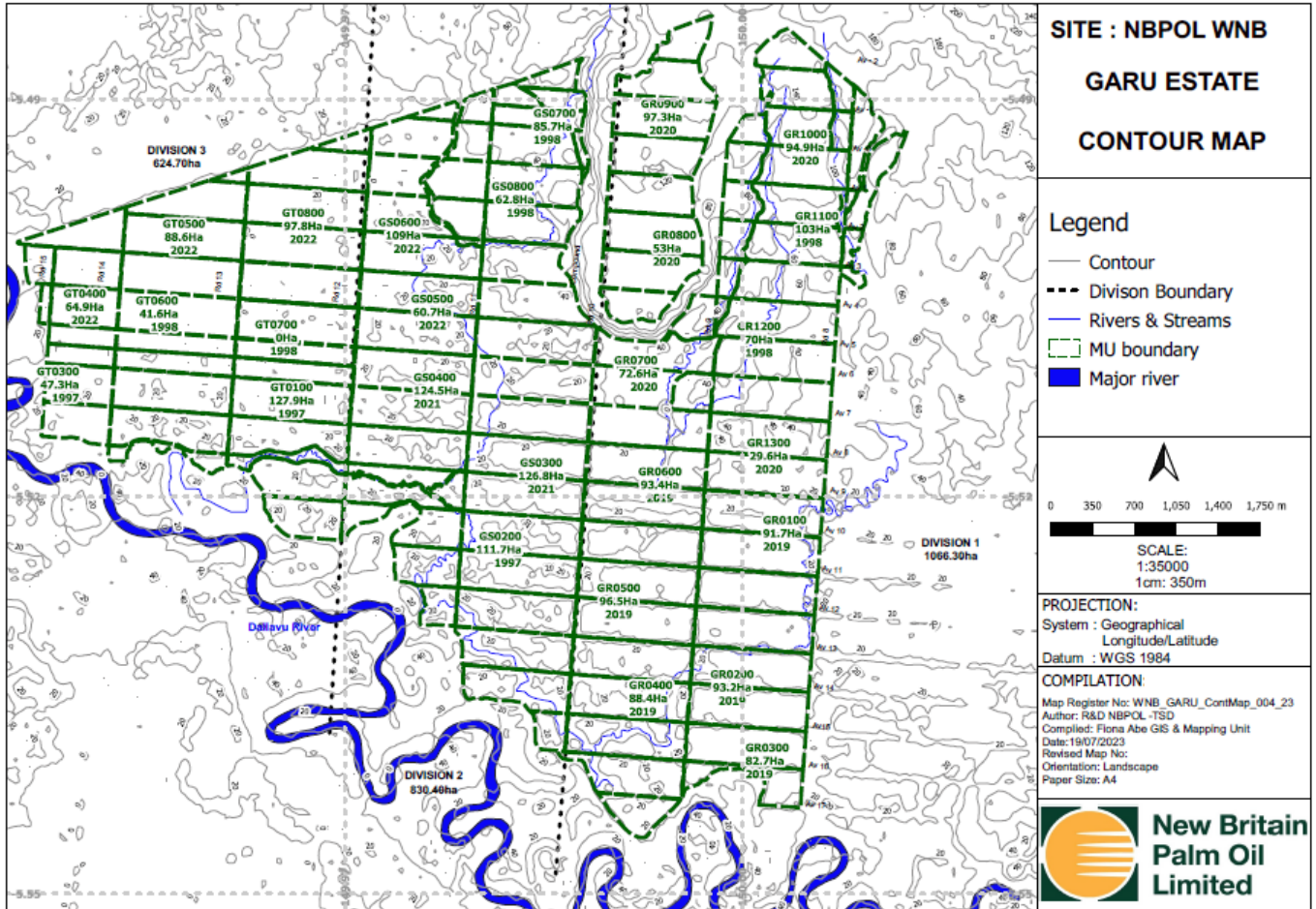


Kumbango Estate

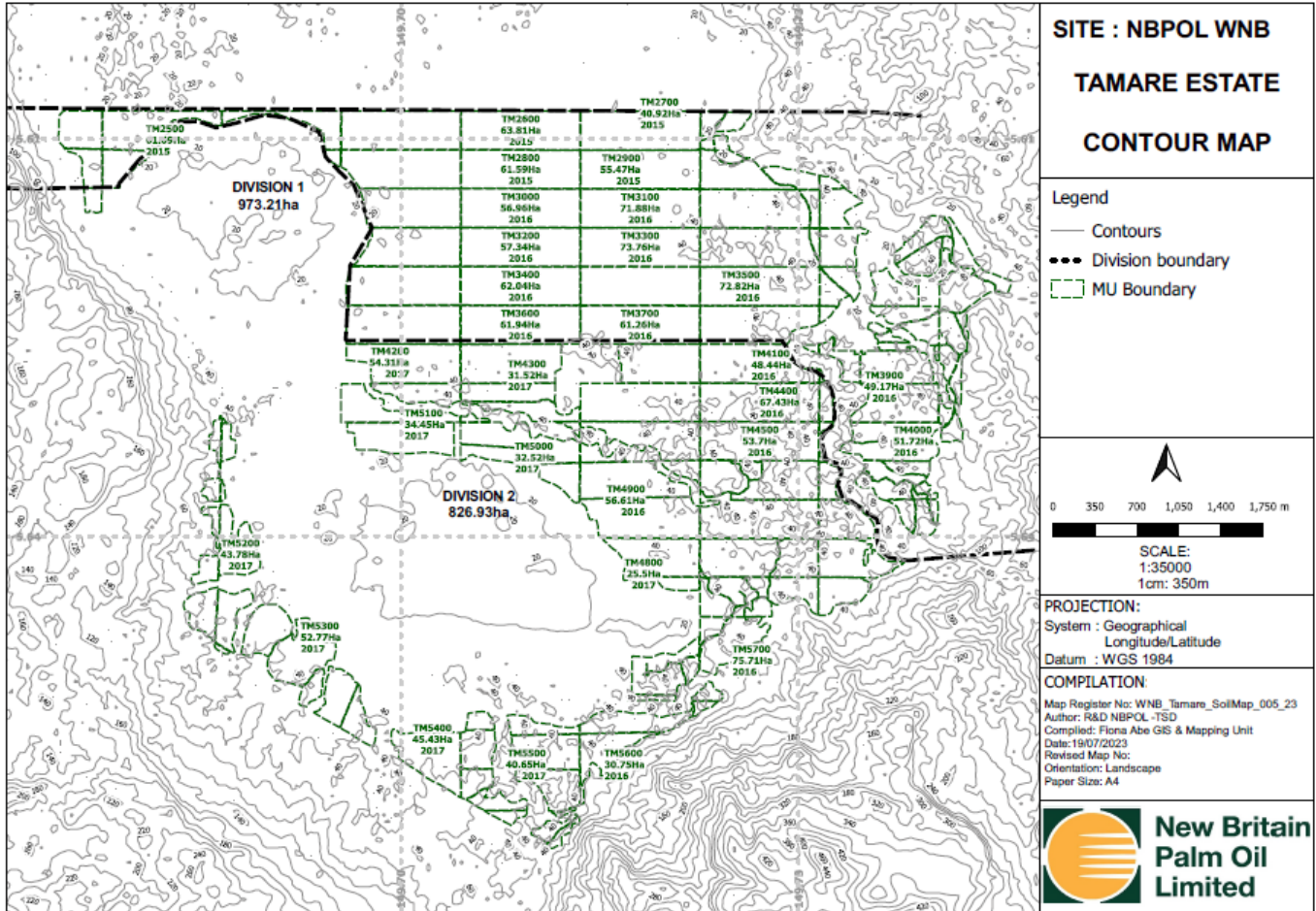


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Garu Estate



Tamare Estate



Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude	Longitude	Total Certified Area	Planted Area			
1	Enoch Lipme	Kumali	5° 41' 30.679" S	150° 12' 14.692" E	1.93	1.83	33.67	2003	087-0005
2	Simon Wanges	Kumali	5° 42' 1.742" S	150° 12' 2.344" E	1.50	1.29	23.74	2003	087-0011
3	Iso Mukum	Kumali	5° 41' 38.948" S	150° 12' 16.839" E	1.98	1.62	29.81	2003	087-0023
4	Mathew Kamale	Kumali	5° 41' 27.774" S	150° 12' 21.569" E	2.00	1.85	34.04	2003	087-0027
5	Mark Paki	Kumali	5° 41' 17.479" S	150° 12' 40.512" E	3.96	3.96	72.86	2003	087-0031
6	Johnson Belly	Kumali	5° 41' 39.332" S	150° 12' 41.037" E	4.03	3.74	68.82	2008	087-0074
7	Lainus Jaminen	Kumali	5° 41' 20.786" S	150° 12' 5.853" E	2.00	2.00	36.80	2006	087-0098
8	Micheal Ivaroa	Dagi	5° 33' 52.031" S	150° 12' 2.317" E	1.87	1.87	34.41	1997	010-0026
9	Mamuel Tioni	Dagi	5° 33' 55.224" S	150° 11' 57.597" E	2.00	1.75	32.20	1990	010-0027
10	Carolyn Martina	Dagi	5° 34' 41.165" S	150° 11' 51.145" E	2.30	1.65	30.36	2004	010-0033
11	Clement Kawai	Dagi	5° 33' 36.334" S	150° 12' 35.934" E	4.93	4.00	73.60	1997	010-0047
12	Anton Waula	Dagi	5° 34' 35.192" S	150° 12' 31.138" E	2.91	1.97	36.25	1997	010-0062
13	Marika Takui	Dagi	5° 33' 53.994" S	150° 13' 7.897" E	3.53	3.17	58.33	1990	010-0082
14	Darusila Uluna	Dagi	5° 34' 15.863" S	150° 11' 53.590" E	3.55	2.12	39.01	2001	010-0291
15	Tom L. Bubes	Marapu	5° 37' 12.306" S	150° 45' 53.078" E	1.91	1.73	31.83	2000	274-0003
16	Paul Ugo	Marapu	5° 36' 25.166" S	150° 45' 39.287" E	1.95	1.24	22.82	2000	274-0025
17	Segagum Boas Kasoso	Marapu	5° 37' 18.648" S	150° 45' 36.297" E	0.79	0.79	14.54	2000	274-0034
18	Paul T. Tuli	Marapu	5° 37' 49.392" S	150° 46' 6.598" E	1.87	1.52	27.97	2000	274-0012
19	Robinson M.Kasoso	Marapu	5° 37' 47.848" S	150° 45' 54.227" E	3.10	1.91	35.14	1998	274-0017
20	Emmanuel Darius	Marapu	5° 37' 19.068" S	150° 45' 41.276" E	4.05	3.29	60.54	2004	274-0020
21	Meshack Bubu	Marapu	5° 35' 3.600" S	150° 45' 51.890" E	2.14	2.09	38.46	1998	274-0057
22	Bertha A. Todiole	Siki	5° 28' 42.728" S	150° 28' 43.571" E	4.01	4.00	73.60	1998	009-0131
23	William Toliman Jnr	Siki	5° 29' 14.411" S	150° 25' 1.152" E	6.60	6.00	110.40	1984	009-0153
24	Albert Gunter	Siki	5° 29' 16.162" S	150° 26' 57.974" E	8.00	8.26	151.98	1999	009-1061
25	Maisembo Haptas	Siki	5° 29' 15.400" S	150° 26' 9.279" E	8.29	8.01	147.38	1995	009-1067
26	Hendry Kinau	Siki	5° 28' 24.630" S	150° 28' 12.609" E	5.96	5.80	106.72	1997	009-2199
27	Steven Belet	Siki	5° 28' 53.864" S	150° 27' 10.196" E	6.00	4.89	89.98	1991	009-2235
28	Benedict Tokanaia	Siki	5° 29' 4.399" S	150° 27' 42.197" E	7.38	7.00	128.80	1997	009-0101
29	Enos Paul	Rapuri	5°32'4.725"S	150°33'37.824"E	2.00	1.30	23.92	2000	046-0017
30	Thomas Paul	Rapuri	5°32'8.645"S	150°33'57.457"E	1.67	1.63	29.99	2000	046-0047
31	Gilbert Mou	Rapuri	5°32'8.804"S	150°33'43.747"E	1.96	1.79	32.94	2000	046-0079
32	Andrew Lailo	Rapuri	5°32'1.798"S	150°33'58.534"E	1.78	1.66	30.54	2000	046-0084
33	Arnold Kaiwa	Rapuri	5°32'7.648"S	150°33'31.513"E	1.95	1.46	26.86	2000	046-0019

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude	Longitude	Total Certified Area	Planted Area			
34	Chris Naku	Rapuri	5°32'15.951"S	150°33'17.720"E	1.95	1.29	23.74	2000	046-0029
35	Robert Kiri	Rapuri	5°32'33.516"S	150°32'59.428"E	2.00	1.43	26.31	2000	046-0040
36	Joe Wilket	Kambili	5° 25' 26.831" S	149° 58' 1.228" E	1.84	2.00	36.80	2005	041-0026
37	Peter Bailey	Kambili	5° 25' 29.521" S	149° 58' 5.837" E	1.99	1.56	28.70	2009	041-0058
38	Mathew Meta	Kambili	5° 23' 26.928" S	149° 58' 6.902" E	2.03	1.82	33.49	2000	041-0073
39	Reu Buku	Kambili	5° 23' 0.98" S	149° 58' 23.74" E	5.01	2.65	48.76	2004	041-0002
40	Micheal Gambu	Kambili	5° 23' 26.928" S	149° 58' 6.902" E	3.63	3.60	66.24	2002	041-0013
41	Frank Nomu	Kambili	5° 25' 2.052" S	149° 57' 53.011" E	3.96	0.74	13.62	2005	041-0041
42	Cyril Stan F	Kambili	5° 25' 31.167" S	149° 57' 54.861" E	2.00	2.00	36.80	2010	041-0103
43	Andrew Bata	Kilu/Patanga/Garile	5° 26' 35.352" S	150° 4' 35.118" E	1.16	1.00	18.40	2001	026-0070
44	Joseph Walia	Kilu/Patanga/Garile	5° 22' 44.455" S	150° 2' 3.571" E	1.79	1.52	27.97	2008	026-0079
45	Anton Chare	Kilu/Patanga/Garile	5° 27' 0.375" S	150° 5' 7.082" E	0.93	0.93	17.11	2007	026-0095
46	Emil Tele	Kilu/Patanga/Garile	5° 22' 30.086" S	150° 2' 55.260" E	1.33	1.00	18.40	2006	026-0107
47	John Kondi	Kilu/Patanga/Garile	5° 25' 40.131" S	150° 4' 59.552" E	2.00	1.90	34.96	2012	026-0134
48	Peter Polly	Kilu/Patanga/Garile	5° 27' 11.133" S	150° 5' 24.593" E	3.08	3.08	56.58	1989	026-0011
49	Joe Bio	Kilu/Patanga/Garile	5° 21' 52.148" S	150° 2' 35.833" E	3.65	3.65	67.16	1997	026-0037
50	Hurbert Longer	Kilu/Patanga/Garile	5° 22' 25.046" S	150° 2' 57.523" E	2.88	2.88	53.05	1997	026-0055
51	Andrew Gala	Liapo	5° 17' 3.98" S	149° 59' 54.34" E	1.88	1.30	23.92	2002	088-0002
52	Micheal Mandaro	Liapo	5° 17' 2.508" S	149° 59' 49.305" E	1.44	1.06	19.50	2005	088-0013
53	Clement Raka	Liapo	5° 16' 58.835" S	149° 59' 49.716" E	1.98	0.91	16.74	2009	088-0019
54	Robert Gare	Liapo	5° 16' 40.924" S	149° 59' 43.646" E	1.93	1.32	24.29	2009	088-0023
55	George Tuka	Liapo	5° 17' 3.377" S	149° 59' 53.681" E	1.13	1.00	18.40	2010	088-0028
56	Isidor Uma	Liapo	5° 17' 13.457" S	149° 59' 17.704" E	1.76	1.70	31.28	2010	088-0037
57	Melkior Giru	Liapo	5° 16' 59.240" S	149° 59' 9.675" E	2.00	1.88	34.59	2011	088-0040
58	R.Rulu	Mosa	5° 37' 41.619" S	150° 16' 41.831" E	7.00	6.21	114.26	1997	012-0008
59	Talli Kerei	Mosa	5° 37' 49.985" S	150° 16' 33.897" E	1.52	1.50	27.60	2000	012-0073
60	Trikas Gola	Mosa	5° 38' 21.234" S	150° 17' 48.223" E	6.79	3.44	63.30	2004	012-0195
61	Robert Paul	Mosa	5° 38' 17.673" S	150° 17' 45.175" E	5.34	5.00	92.00	2000	012-0246
62	Steven Bais	Mosa	5° 37' 31.239" S	150° 16' 33.536" E	2.65	2.60	47.84	1997	012-0006
63	Gabriel Ruango	Mosa	5° 37' 45.479" S	150° 16' 39.435" E	4.42	3.19	58.70	1984	012-0091
64	Xavier Galo	Mosa	5° 37' 41.006" S	150° 17' 19.455" E	2.41	1.11	20.42	1995	012-0236

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude	Longitude	Total Certified Area	Planted Area			
65	John Kulambe	Buvussi	5° 36' 1.227" S	150° 21' 54.456" E	6.71	6.70	123.28	1984	004-1146
66	W. Tambeti	Buvussi	5° 36' 9.884" S	150° 22' 28.593" E	3.47	3.47	63.85	1986	004-1155
67	Aiwa Kamane	Buvussi	5° 37' 11.448" S	150° 23' 9.724" E	6.25	5.96	109.66	1989	004-1202
68	Y. Akui	Buvussi	5° 37' 24.166" S	150° 22' 8.704" E	5.84	5.80	106.72	1997	004-1329
69	K.Kiaki	Buvussi	5° 36' 19.228" S	150° 23' 59.219" E	10.39	10.26	188.78	1984	004-1422
70	Andrew Gene	Buvussi	5° 37' 20.099" S	150° 23' 34.545" E	7.52	7.50	138.00	1987	004-1445
71	P. Guli	Buvussi	5° 38' 22.724" S	150° 23' 38.027" E	11.46	11.46	210.86	1984	004-1382
72	Kikia Sogove	Buvussi	5° 36' 47.808" S	150° 22' 4.802" E	5.38	5.38	98.99	1984	004-1259
73	Pavi	Kapiura	5° 35' 33.191" S	150° 45' 57.416" E	47.47	36.86	678.22	2012	294-0001
74	Umali	Kapiura	5° 38' 16.939" S	150° 42' 7.883" E	13.68	26.91	495.14	2008	288-0001
75	Moramora	Siki	5° 26' 37.406" S	150° 30' 23.538" E	27.76	34.95	643.08	1986	112-0001
76	John Siwisika	Kavui	5° 36' 38.950" S	150° 18' 10.230" E	36.92	33.40	614.56	2014	283-0001
77	Akami Estate	Buvussi	5° 40' 8.588" S	150° 27' 54.935" E	206.93	222.10	4086.64	2001	058-0001
Total					583.12	573.21	10,547.03		

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
SHA	Smallholder Association
SIA	Social Impact Assessment
SOP	Standard Operating Procedure