

**RSPO PRINCIPLE AND CRITERIA –
1st Annual Surveillance Assessment (ASA1_1)
Public Summary Report**

IOI Corporation Berhad
Head Office: IOI City Tower 2, Lebuhr IRC IOI Resort City 62502 Putrajaya, Malaysia
Certification Unit: Ladang Sabah Sdn Bhd Ladang Sabah Palm Oil Mill and supply base Location of Certification Unit: Mile 45, Sandakan/Telupid Road, W.D.T 164 90009 Sandakan, Sabah, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	2-0002-04-000-00	Membership Approval Date	17/05/2004
Parent Company Name	IOI Corporation Berhad		
Address	IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia		
Subsidiary (Certification Unit Name)	Ladang Sabah Sdn Bhd Ladang Sabah Palm Oil Mill		
Address	Mile 45, Sandakan/Telupid WDT 164 90009 Sandakan, Sabah, Malaysia		
Contact Name	Mr. Leang Hon Wai (General Manager, IOI Sandakan Region, Sabah) Dr. Raymond Alfred (Sustainability Manager, Plantation Division, IOI HQ) Mr. Agos Bin Atan (Manager - Sustainability (Sabah)) Mr. P Kalaiselvan (Mill Manager, Ladang Sabah POM) Mdm Veronica Abel (Assistant Manager, SPO Department Sandakan Region, Sabah)		
Website	www.ioigroup.com	E-mail	hwleang@ioigroup.com raymond.alfred@ioigroup.com agos@ioigroup.com kalaiselvan@ioigroup.com veronica.abel@ioigroup.com
Telephone	+603-89478888 (Head Office) +6089-509101 (Regional Office) +6089-568908 (Ladang Sabah POM)	Facsimile	+603-89432266 (Head Office) +6089-509100 (Regional Office) +6089-568909 (Ladang Sabah POM)

2. Certification Information			
Certificate Number	RSPO 687135	Date of First Certification	03/04/2013
		Certificate Start Date	03/04/2018
		Certificate Expiry Date	02/04/2023
Scope of Certification	Palm Oil and Palm Kernel Production from Ladang Sabah Palm Oil Mill and Supply Base (Bimbingan 1, Bimbingan 2, Labuk, Laukin, Luangmanis, Moynod, Terusan Baru, Sungai Sapi Estate)		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D)		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert_ID218-20180087	ISCC EU	INTERTEK	10/08/2019
SGS-MSPO-MY18/1102977931	MSPO 2530-3:2013 & MSPO 2530-4:2013	SGS (Malaysia) Sdn Bhd	19/06/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Ladang Sabah Palm Oil Mill	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 43' 47.96" N	117° 34' 39.90" E
Bimbingan 1 Estate	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 37' 16.55" N	117° 26' 45.30" E
Bimbingan 2 Estate	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 37' 10.64" N	117° 25' 22.59" E
Labuk Estate	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 40' 13.35" N	117° 29' 55.92" E
Laukin Estate	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 46' 42.49" N	117° 31' 56.76" E
Luangmanis Estate	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 45' 47.98" N	117° 36' 22.94" E
Moynod Estate	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 44' 26.95" N	117° 36' 37.38" E
Terusan Baru Estate	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 48' 27.13" N	117° 31' 1.21" E
Sungai Sapi Estate	Mile 45, Sandakan / Telupid Road, WDT 164, 90009 Sandakan, Sabah	05° 45' 53.37" N	117° 36' 37.15" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bimbingan 1 Estate	1,795	0	179.20	1,974.20	90.92
Bimbingan 2 Estate	1,735	0	183.80	1,918.80	90.42
Labuk Estate	2,367	87.25	214.25	2,668.50	88.70

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Laukin Estate	1,975	0	153	2,128.00	92.81
Luangmanis Estate	2,500	0	213.29	2,713.29	92.14
Moynod Estate	2,743	0	300.71	3,043.71	90.12
Terusan Baru Estate	2,226	60.97	216.56	2,503.53	88.91
Sungai Sapi Estate	1,220	33.7	45.60	1,299.30	93.90
Total	16,561	181.92	1,506.41	18,249.33	90.75

Remarks:

1. Moynod Estate : -34Ha variance on planted area (Re-survey by GIS Department after replanting and re-blocking due to additional buffer area)
2. Terusan Baru Estate : -21Ha variance on planted area (Re-survey by GIS Department after replanting and re-blocking due to additional buffer area). HCV area was revised in hectarage after re-demarcation was carried out by GIS Department in July 2018.
3. Labuk Estate: Technical wrong data entry. The previous figure mentioned in the Pre-Audit Information were all under the category of Conservation Area. The HCV area remains at 87.25.

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bimbangan 1 Estate	394	0	0	1,401	0	1,401	394
Bimbangan 2 Estate	158	0	0	1,577	0	1,577	158
Labuk Estate	158	287	1,922	0	0	2,209	158
Laukin Estate	153	0	0	1,822	0	1,822	153
Luangmanis Estate	412	0	0	1,734	354	2,088	412
Moynod Estate	562	0	0	2,181	0	2,181	562
Terusan Baru Estate	433	799	156	838	0	1,793	433
Sungai Sapi Estate	0	0	225	995	0	1,220	0
Total (ha)	2,270	1,086	2,303	10,548	354	14,291	2,270

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (April 2018-March 2019)	Actual (January 2018 – December 2018)	Forecast (April 2019 – March 2020)
Bimbangan 1 Estate	34,898.00	29,235.84	39,605.00

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Bimbingan 2 Estate	38,712.00	30,110.39	30,829.00
Labuk Estate	65,540.00	54,491.02	60,236.00
Laukin Estate	50,875.00	43,197.03	46,645.00
Luangmanis Estate	57,806.00	55,077.45	50,567.00
Moynod Estate	62,941.00	56,024.69	60,037.00
Terusan Baru Estate	43,360.00	40,627.27	43,464.00
Sungai Sapi Estate	33,694.00	29,593.00	30,905.00
Total	387,826.00	338,356.69	362,288.00

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (April 2018-March 2019)	Actual (Jan 2018-December 2018)	Forecast (April 2019 – March 2020)
Linbar 1	N/A	1,468.25	N/A
Linbar 2		1,383.72	
Sakilan		3,253.05	
Meliau		118.56	
Total		6,223.58	

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (April 2018-March 2019)	Actual (Jan 2018-December 2018)	Forecast (April 2019 – March 2020)
	N/A		
Total			

10. Certified Tonnage			
Mill Capacity: 40 MT/hr	Estimated (April 2018-March 2019)	Actual (Jan 2018-December 2018)	Forecast (April 2019-March 2020)

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SCC Model: IP	FFB	FFB	FFB
	387,826.00 mt	344,580.27 mt	362,288.00 mt
	CPO (OER: 21.5%)	CPO (OER: 20.37 %)	CPO (OER: 21.00%)
	83,382.00 mt	70,195.35 mt	76,123.00 mt
	PK (KER: 5.63%)	PK (KER: 5.42 %)	PK (KER: 5.50%)
	21,848.00 mt	18,660.29 mt	19,937.00 mt

11. Actual Sold Volume (CPO) (Jan 2018- Dec 2018)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	55,181.28	3,999.66	0	4,087.52	63,268.46

12. Actual Sold Volume (PK) (Jan 2018- Dec 2018)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	17,328.64	0	0	0	17,328.64

13. Actual Group certification Claims (Jan 2018- Dec 2018)		
	Credit	Physical Volume (MT)
IS-CSPO	-	-
IS-CSPKO	-	-
IS-CSPKE	-	-

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 21-25/01/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Ladang Sabah Palm Oil Mill	✓	✓	✓	✓	✓
Bimbingan 1 Estate			✓		✓
Bimbingan 2 Estate	✓		✓		✓
Labuk Estate			✓		✓
Laukin Estate		✓			
Luangmanis Estate	✓			✓	
Moynod Estate		✓			
Terusan Baru Estate		✓		✓	
Sungai Sapi Estate	✓			✓	

Tentative Date of Next Visit: January 20, 2020 – January 24, 2020

Total No. of Mandays: 16 mandays (including 1 day for mill - SC audit)

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2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hu Ning Shing (HNS)	Team Leader	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill. She is fluent in Bahasa Malaysia and English languages.
Valence Shem (VSH)	Team member	Holds a Bachelor Degree in Industrial Technology from University of Science Malaysia in 1998. He has 9 years working experience in oil palm plantation industry. He started management system auditing line since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. In this assessment, the focus element includes legal requirements, environmental management, conservation & biodiversity, GHG emissions and agriculture best practices. He is able to communicate in Bahasa Malaysia and English.
Muhamad Naquiddin Mazeli (MN)	Team member	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations.

Accompanying Persons:

No.	Name	Role
	N/A	

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2.3 Assessment Plan

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

PRELIMINARY AGENDA					
Date	Time	Subjects	HNS	VS	MN
Monday 21/01/2019 Ladang Sabah Palm Oil Mill	AM	Audit team travelling to Sandakan (AK 5192 – Arrive 0910) MN travelling to Sandakan (AK 5194 – Arrive 1630)	√	√	-
	1200 – 1600	Supply chain audit for Ladang Sabah POM <ul style="list-style-type: none"> • General COC for supply chain • RSPO rules communication and claim • Module D: Identity Preserved 	√	√	-
	1600	Interim Closing Briefing	√	√	-
Tuesday 22/01/2019 Ladang Sabah Palm Oil Mill	0830 - 0900	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). • Verification on previous audit findings 	√	√	√
	0900 – 1200	Ladang Sabah Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.	√	√	√
	1100 -1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1200 – 1300	Lunch	√	√	√
	1300 - 1630	Ladang Sabah Palm Oil Mill Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Wednesday 23/01/2019 Moynod Estate	0830 - 1200	Moynod Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√

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	1000 – 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1200 -1300	Lunch	√	√	√
	1300 - 1630	Moynod Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Thursday 24/01/2019	0830 - 1200	Terusan Baru Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
Terusan Baru Estate	1200 -1300	Lunch	√	√	√
	1300 - 1630	Terusan Baru Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Friday 25/01/2019	0830 - 1200	Laukin Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
Laukin Estate	1200 -1300	Lunch	√	√	√
	1300 - 1600	Laukin Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1600 - 1630	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	1630 - 1730	Closing Meeting	√	√	√
	1730	Traveling to Kuala Lumpur (AK 5197 – Depart 2100)	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

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

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	Yes	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, new rounds of (ASA) have been completed in the other certification units [Pamol (Sabah) POM, <i>Sabah</i> , Gomali POM, Baturong POM, Bukit Leelau POM, Mayvin POM, Pukin POM, <i>Pahang</i> , Leepang (Sabah) POM, Syarimo POM, Ladang Sabah POM, Morisem POM, <i>Sabah</i>].	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No	Yes

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Have there been any stakeholder comments?	Up to date, there is no comment.	Yes
Un-Certified Units or Holdings		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below: https://rspo.org/certification/new-planting-procedures/public-consultations/ioi-group-pt-kalimantan-prima-agro-mandiri</p>	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>PT KPAM Indonesia sent HCV assessment report to HCVRN and received letter of satisfactory from HCVRN on 25th November 2017.</p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below: http://highcarbonstock.org/registered-hcs-assessments/</p>	Yes
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>Grassroots has officially withdraw themselves as the complainer for IOI-Pelita land dispute case on 22nd June 2018 and is signing an agreement with IOI on being the facilitator for the dispute resolution. Grassroots withdrawal as the complainer are seen to avoid the "Conflict of Interest" if they are going to sign an agreement with IOI on this case.</p> <p>IOI has continued to work closely with all its stakeholders especially Grassroots and RSPO Complaints Panel (CP) concerning the IOI-Pelita case to resolve this long-standing dispute.</p> <p>The ground team has actively conducted land survey procedure in Tegai Estate involving communities and cooperation from Sarawak Land Survey Department in July 2018. The data obtained from the survey will be used in the compensation mechanism with the communities hence resolving dispute in the area.</p>	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	In IOI Sustainable Palm Oil Policy under section 7 on transparency and wider engagement, we are committed to resolve complaints and conflicts effectively and responsibly through open transparent process upon agreed by affected stakeholders. Where internal grievance is submitted through estate green book, discussed through various committee meeting such as Employee Consultative Committee (ECC), Joint Consultative Committee (JCC), Gender Consultative Committee (GCC) and Internal Stakeholder Meetings.	Yes

<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>No</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>IOI has conducted an Internal audit on Uncertified Units to identify the issues involved, on-going corrective actions and monitoring.</p> <p>The progress are as follows:</p> <p>1. IOI Pelita, Sarawak:</p> <p>IOI has continued to work closely with all its stakeholders especially Grassroots and RSPO Complaints Panel (CP) concerning the IOI-Pelita case to resolve this long-standing dispute.</p> <p>The ground team has actively conducted land survey procedure in Tegai Estate involving communities and cooperation from Sarawak Land Survey Department in July 2018. The data obtained from the survey will be used in the compensation mechanism with the communities hence resolving dispute in the area.</p> <p>2. PT SKS, PT BNS, PT BSS, Indonesia:</p> <p>Update on the RSPO Suspension and complaint by Aidenvironment – Final verification by RSPO CP was conducted in end of January 2018.</p> <p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development.</p> <p>Certification preparations in progress. As part of the preparation, Certification Body had been engaged to conduct the gap assessment. The gap assessment was conducted in end of August 2018.</p> <p>3. PT KPAM, Indonesia</p> <p>RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:</p> <p>https://rspo.org/certification/new-planting-procedures/public-consultations/ioi-group-pt-kalimantan-prima-agro-mandiri</p>	<p>Yes</p>

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	Not applicable	

3.4 Details of findings

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

During the 1st Annual Surveillance Assessment there was one (1) Major & one (1) Minor nonconformity raised. The Ladang Sabah Palm Oil Mill 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 Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1728629-201901-M2	Clause & Category (Major / Minor)	Indicator Major
Date Issued	25/01/2019	Due Date	24/4/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/4/2019
Statement of Nonconformity:	The SOP for the estates was not consistently implemented and monitored.		
Requirement Reference:	Standard Operating Procedures (SOPs) for estates and mills are documented.		
Objective Evidence:	<p>Moynod Estate: One of the sampled worker (Employee No.: MYN0500) was found harvested total 226 bunches on 24/12/2018 as per the MW1: Rekod Pemantauan Kedatangan & Tugasan Harian Pekerja within 9 hours of working hour for Field 97L. Verified with the checker's record dated 24/12/2018 found that the total bunches that the FFB checker checked were 226 bunches for Field 97K. However, the time for the FFB checker taken to check the 226 bunches was from 7.35 a.m to 11.09 a.m. on 24/12/2018.</p> <p>Terusan Baru Estate: Sampled the payslip Month March 2018, Daily Bunch Count by Harvester by Field/Location for 31/3/2018, Harvester Bunch Count for the month of March 2018, Checker Chit dated 31/3/2018 and MW2: Borang Ulasan Pencapaian Produktiviti Pekerja for one of the harvester (Employee No.: TRB1100) found that all these records were not consistent. For eg:</p>		

	<ul style="list-style-type: none"> • MW2: Borang Ulasan Pencapaian Produktiviti Pekerja shown that the worker has worked on 30/3/2018 and harvested 95 bunches and absent on 31/3/2018. • Daily Bunch Count by Harvester by Field/Location for 31/3/2018 has recorded total 95 bunches. • Harvester Bunch Count for the month of March 2018 shown total 95 bunches on 31/3/2018. • Checker has checked the FFB on 31/3/2018 from 6.55 a.m. to 7.10 a.m. for total 95 bunches. However, the time taken for the checkers to check the FFB if it was harvested on 31/3/2018 and 24/12/2018 was not make sense. Confirmed with the management that the FFBs were harvested the day before rest day which means the FFBs were at the field for more than 24 hours. <p>However, according to the Group Standard Operating Procedure (StOP) for Harvesting Mature Palm Fresh Fruit Bunch and Group Standard Operating Procedure (StOP) for Fresh Fruit Bunch (FFB) Evacuation and Transport stated that all harvested FFB should be delivered to the mill within 24 hours after harvesting.</p>
<p>Corrections:</p>	<p><u>Moynod Estate & Terusan Baru Estate:</u></p> <ol style="list-style-type: none"> 1. Reminder letter given to Field Supervisor and the Mandore for not escalating information to the management on any backlog that were harvested but not yet graded. 2. The field supervisor, mandore, and the harvester will be given briefing on the importance of practising integrity while performing their job. This is also to ensure that there wouldn't be any other matter arising from the backlog that were left at the field for more than 24hours and correct information recorded on form. 3. The record of MW1 for harvester (MYN0500) has been corrected to contain the exact field block harvested and acknowledged by the Estate Manager. 4. The record of MW2 for harvester (TRB1100) was corrected according to the MW1 form filled.
<p>Root Cause Analysis:</p>	<p>The Fresh Fruit Bunch (FFB) graded on early 24th December 2018 and 31st March 2018 were an accumulation of a 2 days harvesting. Part of the FFB were harvested on 22nd evening and 29th March and the rest were on the 24th December and 31st March morning respectively. The FFB harvested on 22nd December and 29th March wasn't graded yet by the checker due to inadequate grading time since this is an additional FFB harvested apart from what have been earlier graded. These ungraded additional harvested FFB causes delay on the transportation to the ramp and further delivery to the mill within 24 hours after harvesting.</p>
<p>Corrective Actions:</p>	<p><u>Moynod Estate & Terusan Baru Estate:</u></p> <ol style="list-style-type: none"> 1. The management has decided to make revision on the existing SOP for FFB evacuation to ensure crop could be evacuated to the mill according to the best practices standard and at a reasonable time should certain circumstances could not be avoided. 2. The regional management will be issuing a memorandum regarding condition practice on harvesting operation. <p><u>Off-site Verification:</u></p>

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	<p>Moynod Estate and Terusan Baru Estate:</p> <p>IOI Group has revised the Group Standard Operating Procedure (StOP) for Fresh Fruit Bunch (FFB) Evacuation and Transport and Group Standard Operating Procedure (StOP) for Harvesting Mature Palm Fresh Fruit Bunch (FFB) last prepared on April 2019. The procedures have revised that if in amidst monsoon period and due to unforeseen circumstances, the harvested crops should be ensured to be delivered within 48 hours to the mill. A memorandum dated 19/3/2019 regarding the practice of deliver of crops to mill should be properly arranged and harvesting operation should be well planned. As the correction, Moynod Estate and Terusan Baru Estate have issued warning letter to the supervisors regarding the failure in monitoring the workers to ensure the crops harvested to be delivered to the mill within 24 hours. Warning letters dated 13/3/2019 for Moynod Estate and 15/4/2019 for Terusan Baru Estate were sighted. A re-training on Group Standard Operating Procedure (StOP) for Harvesting Mature Palm Fresh Fruit Bunch (FFB) was carried out on 25/2/2019 in Moynod Estate and 15/4/2019 in Terusan Baru Estate to all the supervisors on harvesting to ensure they are understand the procedures of evacuating the crops to mill within allowable timeframe. Attendance list of the training was sighted. Both the MW1: Rekod Pemantauan Kedatangan & Tugasan Harian Pekerja and MW2: Borang Ulasan Pencapaian Produktiviti Pekerja has amended according to the actual situation.</p>
<p>Assessment Conclusion:</p>	<p>The implementation of corrective action plan was found to be effective. Thus, the major NCR is closed on 28/1/2019.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1728629-201901-N1	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Date Issued	25/01/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	The mechanism to ensure some compliance to legal was not adequately demonstrated.		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence:	<p>Ladang Sabah POM:</p> <p>1) Found AESP (Standby Person) is not Competent person (Employee No.: LSM0006) for activity Sludge tank (Confined space) cleaning dated 5 Dec 2018 (Serial no. 00341) as per Industry Code of Practice for Safe Working in a Confined Space 2010.</p> <p>2) During the site visit at LSPOM land irrigation Block 97M plot 5 (Moynod Estate), at the final trench of the effluent trenches series, it was found that a PVC pipe was installed to channel any potential overflow from the final trench to the environment. This is not in line with the requirements No. 8 and 9 of the DOE's compliance schedule stipulated in License No. 003445, validity 1/7/2018 to 30/6/2019.</p>		

	<p>Terusan Baru Estate: a. Payslips, employment contracts and permits for the two drivers from FFB transporter in Terusan Baru Estate (Vehicle No. SS1028P and ST7173E) were not sighted.</p> <p>Terusan Baru Estate and Laukin Estate: The details of the employers stated in the permit possessed by the contractor's workers were not accurate as per actual situation and sampled as below:</p> <p>a. Permit No.: PE 6521405 valid until 12/10/2019 - Plantation Workers with Sapi Plantations Sdn Bhd (TBE)</p> <p>b. Permit No.: PE 1022554 valid until 25/2/2019 – Plantation Workers with Safima Plantation Sdn Bhd (LE)</p> <p>c. Permit No.: PE 0272244 valid until 28/2/2019 – Plantation Workers with Genting SDC Sdn Bhd (LE)</p>
<p>Corrections:</p>	<p><u>Ladang Sabah Palm Oil Mill</u></p> <ol style="list-style-type: none"> Ladang Sabah Palm Oil Mill has confirmed to send another 16 personnel to take AESP course conducted by National Institute of Occupational Safety and Health (NIOSH) to be held at Sandakan on 21.2.2019 & 22.02.2019. Mill will display a list of competent person at mill's notice board for awareness and to prevent confusion on the competency personnel. Mill will prepare a checklist for daily monitoring on the trenches to ease the operator for site checking. <p><u>Terusan Baru Estate</u></p> <p>A meeting will be held with the contractor to explain more thoroughly regarding the documentations needed to comply with RSPO requirements. Terusan Baru Estate will give duration of time to the contractor to complete the required documentations. The contractor will also be monitored to ensure they comply with RSPO requirements.</p> <p><u>Terusan Baru Estate and Laukin Estate</u></p> <p>Both Terusan Baru Estate and Laukin Estate had issued a reminder letter for the contractor to make changes on their workers' work permit information which shall be valid used with the company they are currently work with.</p>
<p>Root Cause Analysis:</p>	<p><u>Ladang Sabah Palm Oil Mill</u></p> <ol style="list-style-type: none"> The employee: LSM0006 was a competent person on AESP before but his competency validity has expired yet he still assumes himself as a competent person. The foreman also assumes that the practise is correct but in actual fact, it wasn't complied with ICOP for Safe Working in a Confined Space 2010. The trenches series was actually an abandoned trenches which was not used before but the management decided to put it back in service end Dec 2018 to increase the effectiveness of the land irrigation. The final trench of the effluent trenches series seen by the auditor was actually the second before the final trench. The final trench was only discovered after audit since it was covered with grasses and runoff soil.

	<p><u>Terusan Baru Estate</u> The vehicle with plate number registration, ST7173E as stated by auditor does not exist in record, the actual record is ST7271E. The other vehicle SS1028E is also registered under the similar FFB contractor. During the surveillance audit, the requested records were not yet available at Terusan Baru Estate although a reminder letter has been sent to the said contractor for compliance. A blunder was made by Terusan Baru Estate for not enclose together a reply letter from the contractor during surveillance audit stating their reason for not complying with the requirement.</p> <p><u>Terusan Baru Estate & Laukin Estate</u> The compliance needs to have a work permit is adhered but the person responsible did not thoroughly ensure the information inside the document is correct and valid to be used at the particular company where the contractor workers work as they did not know on the correct procedure to do so.</p>
<p>Corrective Actions:</p>	<p><u>Ladang Sabah Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. Issuance of memorandum from the mill management regarding the importance of competency against work operation at mill together with the list of competent person to conduct respective work at the station. 2. Briefing regarding the importance of having compliance with the laws & regulations will be conducted on regular basis. 3. To conduct an awareness training for the staff and workers involved in operating and maintaining land irrigation and trenches area and the importance of a regular patrolling. As far as practical on ground, Ladang Sabah Palm Oil Mill will take into consideration to put a pole at the final trench to ease indication. <p><u>Terusan Baru Estate / Laukin Estate</u></p> <ol style="list-style-type: none"> 1. IOI Ladang Sabah Group will conduct an annual meeting with their contractors, reminding them to comply with requirements related to sustainability. For Terusan Baru and Laukin Estate, meeting with their respective contractors will be conducted on regular basis to remind them to comply with requirements related to sustainability and to make sure they have given the required documentations to ensure that this non-compliance will not recur in the future. 2. Compliance monitoring training on Contractor Management Record will be carried out for operating unit's continuous awareness.
<p>Assessment Conclusion:</p>	<p>Corrective action plan is accepted. Since this is a minor NC, the effectiveness of implementation shall be verified in the next assessment.</p>

<p align="center">Opportunity for Improvements</p>	
<p>OFI #</p>	<p align="center">Description</p>
<p>OFI 1</p>	<p>1728629-201901-01</p>

	<p>Indicator 6.1.3</p> <p>Details Annual review for Social Impact Assessment – Management Action Plans & Continuous Improvement Plan was conducted. Stateless dependent living inside the workers’ housing was identified in the Social Impact Assessment and Management Action Plan. However, the negative and positive impacts identified for the issue were inappropriate and management action to monitor and execute to minimize and control the issue could be further improved.</p>
OFI 2	<p>1728629-201901-02</p> <p>Indicator 4.8.1</p> <p>Details All estate Training was given by the employer that covers all aspects of the RSPO Principles and Criteria such as, Insurance, agreement and gender but during the site verification and interviews it was found to be inadequate.</p>
OFI 3	<p>1728629-201901-03</p> <p>Indicator 2.1.1</p> <p>Details The mill can improve the credibility of its location map of upstream and downstream sampling points at Muanad River by getting acknowledgement from the Department of Environment.</p>

Positive Findings	
PF #	Description
PF 1	Nil

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	1582202-201801-M1	Clause & Category (Major / Minor)	Indicator 4.1.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	25/03/2018
Statement of Nonconformity:	The agreed corrective actions between IOI Ladang Sabah and Intertek to close the previous minor NCR was not effectively implemented.		
Requirement Reference:	A mechanism to check consistent implementation of procedures shall be in place.		
Objective Evidence:	At the Estates, the process implemented was not able to adequately ensure that: <ul style="list-style-type: none"> a) FFB contractor’s drivers have the necessary driving licenses b) FFB contractor’s lorries have the valid road taxes and are insured c) The FFB contractor pay their drivers promptly d) The FFB contractors provide proper PPEs to their drivers 		

	The evidence of implementation of the previous CAP which reads "Joint meeting to be held in quarterly basis between IOI regional management, respective estate and contractors in purpose to deliver the objective of the monitoring implementation mechanism according to legal requirement and as a monitoring mechanism form", was not available.
Corrective Actions:	The meeting frequency will be reschedule to an annual basis meeting. The compliance monitoring will be carried out by respective estate on a regular basis. A meeting between the management and the all contractors was held on 13/3/2018. One of the agenda was on the FFB transporter contractors must have valid license for their lorry drivers and valid road tax. The minutes of meeting, pictorial evidence of the meeting and presentation material were presented to the auditor for verification. Based on verification, the evidence was found to be adequate to close the NCR.
Assessment Conclusion:	Verification during ASA1_1: The latest meeting have been conduct on 3 December 2018, discussion regarding to compliance to RSPO and regulation requirement is available and the internal audit will be verified for the FFB contractor followed as per requirement. The sampling on FFB contractor driving license and road tax is being made in Moynod estate (Syarikat Ujang Sekeluarga) and Terusan Baru estate (Syarikat Pengangkutan Satrijaya). Based On verification, the evidence is found to be adequate.

Non-Conformity			
NCR Ref #	1582202-201801-N1	Clause & Category (Major / Minor)	Indicator 5.3.2 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	25/01/2019
Statement of Nonconformity:	The waste management plan to avoid or reduce pollution was not effectively implemented.		
Requirement Reference:	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
Objective Evidence:	Luangmanis Estate a) The effectiveness of the oil trap at the diesel tank was not adequately demonstrated due to the error of design and its outlet flow was not traceable. b) Observed at vehicle parking area, no dripping/containment tray placed below the parked vehicle (as written in the EIA action plan) with evidence of contaminated soil. c) Domestic waste and other type of waste was found scattered next to fence beside workshop area.		
Corrective Actions:	a)To seek the final outlet and to modified the design in accordance to the practicable oil trap design. b) Not applicable. c) To expand the coverage scope of inspection at the workplace. A training awareness will be given to the workshop personnel, Field Supervisor in-charge and the Environmental Liaison Officer.		
Assessment Conclusion:	Verification during ASA1_1: a) The structure of the oil trap had been improved where the overflow outlet is now visible.		

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	<p>b) Although the tractors are in good conditions, the estate has decided to continue the practice of putting plastic tray underneath the tractors engine whenever left for parking as a preventive measure.</p> <p>c) There was no more rubbish indiscriminately dumped around the workshop area. The revised inspection checklist was also effectively utilised by the person in-charge.</p> <p>Based on the site visit and evidence verification, the implementation of corrective action was found to be effective and therefore the minor NC is satisfactorily closed.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1582202-201801-M1	Major	4.1.2	26/1/2018	Closed on 25/3/2018
1582202-201801-N1	Minor	5.3.3	26/1/2018	Closed on 25/01/2019
1728629-201901-M2	Major	4.1.1	25/01/2019	Closed on 20/4/2019
1728629-201901-N1	Minor	2.1.3	25/01/2019	"Open"

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Ladang Sabah Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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




List of Stakeholders Contacted	
Internal Stakeholders	Union/Contractors/Local Communities
Creche Attendants	Contractors

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Weighbridge Operator	Smallholders
Government Departments School Representative (SK Moynod) HUMANA Teachers JTK Sandakan Officer	NGO Nil

IS #	Description
1	Feedbacks: Crèche Attendants – They informed that their wages were paid according to the Minimum Wage Order 2016 and Labour Ordinance (Sabah Cap. 67). They are satisfied with the housing provided. No case of discrimination was reported. They understood the complaint procedure.
	Management Responses: The management noted.
	Audit Team Findings: No further issue.
2	Feedbacks: Weighbridge Operators – They have been trained on the Supply Chain requirements and clearly understood the procedure of receiving FFB and outgoing of CPO.
	Management Responses: The management will continuously train the weighbridge operators whenever necessary.
	Audit Team Findings: No further issue.
3	Feedbacks: Contractors – They informed that they have signed agreement prior provide service to the company. They have good relationship with the management and understood the complaint procedures.
	Management Responses: The management will continue to maintain the good relationship with the contractors.
	Audit Team Findings: No other issue.
4	Feedbacks: School’s Representatives (SK Moynod) – They informed that the management has made contribution to the school by repair the defects of the school. However, they requested the management could be speed up the repair works for the safety of the students.
	Management Responses: The management informed that they will carry out repair work during the school holiday to protect the safety of the children.
	Audit Team Findings: This will be verified during next assessment.
5	Feedbacks: HUMANA teachers – They have good relationships with the managements and the management will provide assistance whenever requested. The management also provide free school bus to send the children to school. HUMANA in Moynod has requested to construct fencing in the school compound for the safety of the children.
	Management Responses: The management will evaluate the necessarily if require to construct the fence.

	<p>Audit Team Findings: This will be verified during next assessment.</p>
6	<p>Feedbacks: Smallholders – They informed that there was no encroachment of land by the company. Trenches, boundary stones and pegs were available to demarcate the boundaries. They understand the procedure of lodge complaints.</p>
	<p>Management Responses: The management will continue to monitor to ensure no encroachment of land.</p>
	<p>Audit Team Findings: No other issue.</p>
7	<p>Feedbacks: JTK Sandakan Officer – She informed that no complaint received for the Ladang Sabah POM and supply bases.</p>
	<p>Management Responses: The management will ensure to comply with the legal requirements.</p>
	<p>Audit Team Findings: No further issue.</p>

Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Ladang Sabah Palm Oil Mill Certification Unit has complied with the RSPO P&C (MY-NI 2014) & RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Ladang Sabah Palm Oil Mill Certification Unit is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hu Ning Shing	Name: LEANG HON WAI
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: IOI Plantation Services Sdn Bhd
Title: Lead Auditor	Title: General Manager
Signature: 	Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  
Date: 30/4/2019	Date: 24/4/2019

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Stakeholder listing was maintained and updated as necessary at each operating units with support by the regional sustainability team.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	DOSH visit at the mill – annual inspection 6 September 2018 by En Ahmad Al bakri and Mohd Fikri. 2 notice have been issue for both sterilizer for repair by DOSH. The action have been taken Apart from that, requests were also recorded in IOI Group Complaint/ Grievance/ Request Book, latest report is on 13 June 2017. No new Grievance from workers and stakeholder. In Laukin estate, DOSH latest visit is on 23 April and 28 March 2018. On march more to accident investigation for Hamid Bin Tepu by Ismail and Ruslan from DOSH	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

Criterion / Indicator	Assessment Findings	Compliance
1.2.1 Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance –	<p>The management have publicly make the certain document such as :- Complaint/Grievance Book; Operating Centre: Ladang Sabah Palm Oil Mill grievances been updated in the book with latest grievance recorded and publicly available for stakeholder, workers and others.</p> <p>Documented as IOI Group Social Impact Assessment the management action plans & continuous Improvement Plans in Ladang Sabah Palm Oil Mill is been prepared on January 2018 Sighted the Policy Statement for No Child Labour; dated 5/11/2009, IOI Group shall not engage, exploit and employ individual below 16 years in its core business and supply chain, shall abide and support within the Children and Young Persons (Employment) Act 1966 (Act 350). Sighted also the Respecting Human Rights Policy which specified that IOI Group uphold the right of freedom of association and eliminate all forms of forced and child labour.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance</p>	<p>IOI Group has developed and implemented Code of Business Conduct & Ethics dated October 2012 where the people to uphold, at all times the IOI Core Values as below:</p> <ul style="list-style-type: none"> a. Integrity b. Commitment c. Loyalty d. Excellence in Execution e. Speed or Timeliness f. Innovativeness g. Cost Efficiency <p>The company employees shall not accept gifts, benefits or entertainment from a third party. Briefing of the policy was conducted during internal stakeholder meetings on 29/10/2018 and to all the workers on 24/11/2018 in Ladang Sabah POM and 1/8/2018 in Terusan Baru Estate.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Engine driver (Gred 2) for POM SB/17/EIP/02/00049 Azizul Bin Ambaran dated valid from 28 Sept 2017</p> <p>AESP for POM is available, 24 person AESP sampling Azwan Alimudin (NW-NSDK-AE-0011-0) valid until 17 Jan 2020. For AGT have 3 person and sampling on person Ahmad Mohd Raza (NW-NSDK-AGT-0045-0) valid until 20 April 2020.</p> <p>In Terusan Baru estate, Hospital Assitant Lija Binti Randi (TRB 2566)(Q2152) dated 11 July 2018 and another HA is Idrin Harimau(TRB 2613)(Q2072) dated 19 October 2018. Noramizah Binti Musnin(TRB 2624) grade 2 1 october 2018 License from Suruhanjaya Tenaga (24839) valid from 26 December 2018 until 25 December 2019 for Genset in Terusan Baru Div 3. Laukin estate, Perakuan Penentuan Timbang dan Sukat (B1201824) dated 21 Jan 2019.</p> <p>License for air compressor in Laukin estate refer to SB PMT 10638 valid until 22 July 2019. Suruhanjaya tenaga for Genset license referred siries no 32897 valid from 19 Oct 2018 until 18 Oct 2019. MA License for Dellasa Priscilla (02950) dated 19 October 2018 and Sharija Binti Ahmad (02952) dated 19 Oct 2018.</p> <p><u>Ladang Sabah POM</u></p> <ul style="list-style-type: none"> • MPOB license, 500264104000, serial no. 191573, valid until 30/06/2019 with processing capacity of 390,000 mt • DOE Compliance schedule, license number 003445 with maximum capacity of 90 mt/hr, validity period: 1/7/2017 to 30/6/2019, ref# JPKKS/12/003445. The mill can improve the credibility of its location map of upstream and downstream sampling points at Muanad River by getting acknowledgement from the Department of Environment (OFI). 	<p>Complied</p>
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		<ul style="list-style-type: none"> • Diesel Permit # S012976 for total quantity of 40,000 litre valid until 9/12/2019 <p><u>Moynod</u></p> <ul style="list-style-type: none"> • Diesel permit #S014134, License holder: Ladang Sabah Sdn Bhd, validity 15/12/2017 to 14/12/2018, permitted purchase quantity at one time: 39,000 lt – application for renewal had been submitted through BLESS and now pending for approval • MPOB license #501728102000, validity 1/5/2018 to 30/4/2019, 8,942 Ha • [shared by Moynod, Luangmanis, Sg Sapi and Labuk], activity: <i>Menjual dan Mengalih FFB</i>, license holder Ladang Sabah Sdn Bhd • Energy Commission license, under Electric Supply Act 1990, license#2018/03630 for generating capacity of 260 kW valid until 14/6/2020 <p><u>Terusan Baru</u></p> <ul style="list-style-type: none"> • Diesel permit #S012969, License holder: Terusan Baru Sdn Bhd, validity 21/12/2018 to 20/12/2019, permitted purchase quantity at one time: 20,000 lt • Diesel permit #S014104, License holder: Mayvin Incorporated Sdn Bhd, validity 8/12/2017 to 9/12/2018, permitted purchase quantity at one time: 20,000 lt – application for renewal through BLESS had been done and now pending for approval • MPOB license #502592602000, validity 1/12/2018 to 30/11/2019, 2,504 Ha, activity: <i>Menjual dan Mengalih FFB</i>, license holder Terusan Baru Sdn Bhd <p><u>Terusan Baru</u></p>	
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Diesel permit #S012859, License holder: Safima Plantations Sdn Bhd, validity 19/10/2018 to 18/10/2019, permitted purchase quantity at one time: 25,000 lt • MPOB license #502981602000, validity 1/1/2019 to 31/12/2019, 1,998 Ha, activity: <i>Menjual dan Mengalih FFB</i>, license holder Safima Plantations Sdn Bhd 	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	Written information on legal requirements was documented and maintained in "Legal Requirements Register", dated 1/11/2018 prepared by SPO Department Sandakan Regional Office. Among the registered laws were Workers Minimum Standard Of Housing And Amenities Act, 1990, OSHA, FMA, EQA and employment act to name a few.	Complied

<p>2.1.3</p>	<p>A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p>	<p>Mechanism for ensuring compliance is described in the "Mechanism of Tracking Law Changes", dated 27/7/2018. The sustainability team is responsible to monitor implementation/updating of information through routine monitoring and internal audit.</p> <p>The internal audit for Ladang Sabah CU was last conducted by the Sustainable Palm Oil Dept. (SPO) from 3/10 to 16/11/2018. Apart from that, a List of License was also available for the estate to monitor the validity of all its licenses such as business license, MPOB license, permits from Labour Department and permits from Energy Commission to name a few.</p> <p>During the site visit at LSPOM land irrigation Block 97M plot 5 (Moynod Estate), at the final trench of the effluent trenches series, it was found that a PVC pipe was installed to channel any potential overflow from the final trench to the environment. This is not in line with the requirements No. 8 and 9 of the DOE's compliance schedule stipulated in License No. 003445, validity 1/7/2018 to 30/6/2019.</p> <p>Terusan Baru Estate:</p> <p>a. Payslips, employment contracts and permits for the two drivers from FFB transporter in Terusan Baru Estate (Vehicle No. SS1028P and ST7173E) were not sighted.</p> <p>Terusan Baru Estate and Laukin Estate: The details of the employers stated in the permit possessed by the contractor's workers were not accurate as per actual situation and sampled as below:</p> <p>a. Permit No.: PE 6521405 valid until 12/10/2019 - Plantation Workers with Sapi Plantations Sdn Bhd (TBE)</p>	<p>Minor nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>b. Permit No.: PE 1022554 valid until 25/2/2019 – Plantation Workers with Safima Plantation Sdn Bhd (LE)</p> <p>c. Permit No.: PE 0272244 valid until 28/2/2019 – Plantation Workers with Genting SDC Sdn Bhd (LE)</p> <p>Found AESP for activity Sludge tank (Confined space)cleaning dated 5 Dec 2018 (Serial no. 00341) the standby person is not Competent person (AESP) workers ID LSM0006 as per Industry Code of Practice for Safe Working in a Confined Space 2010.</p> <p>Thus, a non-conformity was assigned due to this lapse.</p>	
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking of changes in any law was done under guidance of its “mechanism of Tracking Law Changes” procedure. Based on the procedure among the mechanism to be implemented are news update, subscription to Lexis Nexis, circular from relevant organizations such as MPOA, MPOB, etc., and trusted media such as internet or press release.	Complied
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>			

Criterion / Indicator		Assessment Findings	Compliance															
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<p>Each of the visited estates were able to demonstrate its right to use lands through copy of land titles. The original are kept by IOI Headquarters, Putera Jaya. Below were the land titles verified at the each estates:</p> <p>Moynod, Terusan Baru, Laukin Estate's land titles:</p> <table border="1"> <thead> <tr> <th>Estates</th> <th>Land Title No.</th> <th>Total Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Terusan Baru</td> <td>i) CL 085322710</td> <td rowspan="4">2,503.53</td> </tr> <tr> <td>ii) PL 096290103</td> </tr> <tr> <td>iii) CL 095310937</td> </tr> <tr> <td>iv) CL 095310946</td> </tr> <tr> <td>Moynod</td> <td>CL 085317497 (sharing with Luang Manis Estate)</td> <td>3,043.71</td> </tr> <tr> <td>Laukin</td> <td>CL 085317924</td> <td>2,128.00</td> </tr> </tbody> </table> <p>Ladang Sabah POM is situated in Moynod Estate's land occupying around 18 Ha of the area.</p>	Estates	Land Title No.	Total Ha	Terusan Baru	i) CL 085322710	2,503.53	ii) PL 096290103	iii) CL 095310937	iv) CL 095310946	Moynod	CL 085317497 (sharing with Luang Manis Estate)	3,043.71	Laukin	CL 085317924	2,128.00	Complied
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Laukin	CL 085317924	2,128.00																
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Although only some of the boundary stones were managed to be found by the company, the demarcation of boundaries at the visited estates using wooden pegs painted with blue and white was very obvious, especially at the boundaries with third parties.	Complied															
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the Ladang Sabah certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as boundary pegs and trenches were constructed to demarcate the boundaries.	Complied															

Criterion / Indicator		Assessment Findings	Compliance
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the Ladang Sabah certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as boundary pegs and trenches were constructed to demarcate the boundaries.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the Ladang Sabah certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as boundary pegs and trenches were constructed to demarcate the boundaries.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the Ladang Sabah certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as boundary pegs and trenches were constructed to demarcate the boundaries.	Complied
Criterion 2.3:			
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute in the Ladang Sabah certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as boundary pegs and trenches were constructed to demarcate the boundaries.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	There is no land dispute in the Ladang Sabah certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as boundary pegs and trenches were constructed to demarcate the boundaries.	Complied
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the Ladang Sabah certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as boundary pegs and trenches were constructed to demarcate the boundaries.	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the Ladang Sabah certification unit at the time of audit. The land belongs to IOI Corporation Berhad and land ownership documents verified. Interviewed with smallholders and local communities confirmed that no encroachment of land by the company as boundary pegs and trenches were constructed to demarcate the boundaries.	Complied
Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual budget and management plan were documented with five years projection includes FFB production, CPO, OER, and KER, costs of production, CAPEX and OPEX. There is no scheme smallholder within the supply base. Ladang Sabah POM 3 Years Business Plan for financial year period from 2018/19 until 2021/22 was available for verification. Business plans for the estates were reflected through annual budget. Budget for the current year (2018/19) and the three years projection i.e. 2019/20 to 2021/22 were available for verification. Among the information available in the annual budget was production cost (per Ha and per mt of FFB/CPO/PK), forecasted yields (FFB, CPO & PK), financial allocation for all the operations i.e. harvesting and evacuation, replanting and field maintenance.	Complied

Criterion / Indicator		Assessment Findings	Compliance																													
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	All of the visited estates have established their replanting programme with 5 years projection as shown in the table below: <table border="1"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="5">Ha/year</th> </tr> <tr> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> </tr> </thead> <tbody> <tr> <td>Moynod</td> <td>253</td> <td>271</td> <td>232</td> <td>209</td> <td>241</td> </tr> <tr> <td>Terusan Baru</td> <td>235</td> <td>194</td> <td>208</td> <td>201</td> <td>0</td> </tr> <tr> <td>Laukin</td> <td>223</td> <td>228</td> <td>219</td> <td>282</td> <td>228</td> </tr> </tbody> </table>	Estates	Ha/year					2019/20	2020/21	2021/22	2022/23	2023/24	Moynod	253	271	232	209	241	Terusan Baru	235	194	208	201	0	Laukin	223	228	219	282	228	Complied
Estates	Ha/year																															
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Principle 4: Use of appropriate best practices by growers and millers																																
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.																																

<p>4.1.1</p>	<p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p><u>Moynod Estate:</u> One of the sampled worker (Employee No.: MYN0500) was found harvested total 226 bunches on 24/12/2018 as per the MW1: Rekod Pemantauan Kedatangan & Tugasan Harian Pekerja within 9 hours of working hour for Field 97L. Verified with the checker’s record dated 24/12/2018 found that the total bunches that the FFB checker checked were 226 bunches for Field 97K. However, the time for the FFB checker taken to check the 226 bunches was from 7.35 a.m to 11.09 a.m. on 24/12/2018.</p> <p><u>Terusan Baru Estate:</u> Sampled the payslip Month March 2018, Daily Bunch Count by Harvester by Field/Location for 31/3/2018, Harvester Bunch Count for the month of March 2018, Checker Chit dated 31/3/2018 and MW2: Borang Ulasan Pencapaian Produktiviti Pekerja for one of the harvester (Employee No.: TRB1100) found that all these records were not consistent. For eg:</p> <ul style="list-style-type: none"> • MW2: Borang Ulasan Pencapaian Produktiviti Pekerja shown that the worker has worked on 30/3/2018 and harvested 95 bunches and absent on 31/3/2018. • Daily Bunch Count by Harvester by Field/Location for 31/3/2018 has recorded total 95 bunches. • Harvester Bunch Count for the month of March 2018 shown total 95 bunches on 31/3/2018. • Checker has checked the FFB on 31/3/2018 from 6.55 a.m. to 7.10 a.m. for total 95 bunches. <p>However, the time taken for the checkers to check the FFB if it was harvested on 31/3/2018 and 24/12/2018 was not make sense. Confirmed with the management that the FFBs</p>	<p>Major nonconformance</p>
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		<p>were harvested the day before rest day which means the FFBs were at the field for more than 24 hours. However, according to the Group Standard Operating Procedure (StOP) for Harvesting Mature Palm Fresh Fruit Bunch and Group Standard Operating Procedure (StOP) for Fresh Fruit Bunch (FFB) Evacuation and Transport stated that all harvested FFB should be delivered to the mill within 24 hours after harvesting.</p> <p>Thus, a non-conformity was assigned due to this lapse.</p> <p>Standard Operating Procedures (SOPs) for estates and mills are documented and maintained. Set of procedures for mill operation detailed out under Group Standard Operating Procedures (StOPs) for Palm Oil Mill, document reference number, IOI/StOP/A, issue:2 dated 1/7/17. On safety practices, guided procedure titled, Occupational Safety and Management System IOI Corporation Berhad (Plantation Division) dated 1 August 2012. List of procedures checked:</p> <ul style="list-style-type: none"> 1.0 FFB Reception 2.0 FFB Handling 3.0 Sterilizer 4.0 Threshing 5.0 Digestion and Pressing 6.0 Oil Room 7.0 Depericarper 8.0 Nut and Kernel Plant 9.0 Product Storage and Despatch 10.0 Laboratory 11.0 Effluent Treatment Plant 12.0 Biogas Plant 13.0 Polishing Plant 	
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Criterion / Indicator	Assessment Findings	Compliance
	<p>14.0 Water Treatment Plant 15.0 Boiler 16.0 Engine Room 17.0 Workshop and Shovel Additional procedure for biogas plant (bio-scrubber system 24/7/16, biogas, generator 1/6/15, biogas flare 1/6/15 and biogas tank farm 1/6/15) established for the operation.</p> <p>For Good Agricultural Practices, two types of procedures used i.e.: 1) Good Agricultural Practice, 2) Group Standard Operating Procedure (StOPs) for Estate Operation, dated 5/12/2007 Among the topics covered are:</p> <ul style="list-style-type: none"> • Planting density • Nursery • Land clearing and preparation • Planting technique • Leguminous cover plant • Manuring • Weeding • Pest and disease • Harvesting • Management and monitoring of existing cultivation of oil palm on peat (newly added in July 2017) • Planting of beneficial plants in estate (newly added in July 2017) 	

Criterion / Indicator		Assessment Findings	Compliance
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	FFB contractor’s drivers have the necessary driving licenses b) FFB contractor’s lorries have the valid road taxes and are insured c) The FFB contractor pay their drivers promptly d) The FFB contractors provide proper PPEs to their drivers The latest meeting with FFB contractor is 3 December 2018 In AP Post, have a SOP regarding to safety check (Pemeriksaan Lori Kontrak Penghantaran Buah (FFB Transport) and also the checklist with approval from AP and manager. Latest record check is dated 21 Jan 2019 is available.	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Records of monitoring and the actions taken are maintained at the mill and estates. Regular visits by GM, PC, Safety and Sustainability team were well maintained accordingly. Visit purpose varies i.e. to monitor operating unit performance as well as conducting water quality, safety and environmental monitoring based on the established management plan. Latest Mill Inspection done by SM or SGM, refer SM and SGM Visitor Book latest date visit is 12 November 2018 and Internal audit done from 3 October 2018 until 16 November 2018, this internal audit cover Mill and supply base.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	There was no third-party sourced FFB received by Ladang Sabah POM since the last assessment. All FFB were sourced from IOI’s certified estates.	Not applicable
Criterion 4.2:			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	The soil fertility management at all the estates was guided by the IOI group StOP, Section 8.0: Manuring and Section 15.0: Foliar sampling. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertiliser application record is available in Moynod estate, sampling from recommendation at 96A RP application is conducted on 16-17 Nov 2018 to completed the task total 333 bag fertiliser. The record is available in Fertiliser application file Division 3 Moynod Estate	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Leaf sampling done by agronomist date 21 Jan 2019. This activity done by yearly and latest agronomist recommendation is available for 2018, from the recommendation NK mix (12.6/24) is been using for 2 nd half programme. Verified from the fertiliser implementation record.	Complied
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	For EFB recycling programme in mill, there are 2 type of programme for EFB disposal. One type is those estates nearby the mill were also applying EFB in the field as nutrient recycling strategy. EFB application was recorded in EFB application record. E.g., based on the records, estate refer to Palm Oil mill month end production report MTD(month to date) is 2989.60 MT The Second programme is dispose to Refinery as for fire, Refinery MTD record is 2002.22 MT. For POME, they use in Biogas plant for generate electricity and Land application.	Complied
Criterion 4.3:			
Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Verification of soil map at all the estates showed that there was no fragile soils exist. Soil analysis dated 21 Jan 2019 done by GIS Department. Soil Map for Moynod also been prepared by GIS Department on Feb 2018 based on reconnaissance soil map. From soil map have 2 type soil (Rumidi & Kretam) In Terusan Baru estate, from soil map dated sept 2018 by GIS major soil is Rumidi type almost 90%.and certain area with Bidu Bidu type and Sook type. No fragile soil in Terusan Baru estate.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Planting on slopes is guided by StOP for Land Preparation for New Planting and Replanting, dated Sep 2007, clause 5.2 construction of terrace at slops >10°. Based on site visits, it was observed that terraces were constructed at the hilly terrain	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road maintenance program for 2019/20 is available for all the visited estates. Among the activities for the road maintenance are roadside pruning, grading and resurfacing, roadside pit (to divert flow of water) and bridges maintenance. Based on the site visit, generally the field road condition was good and accessible.	Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	Based on the soil map and observation during the site visit, there was no peat soil. No peat soil in Moynod estate and Terusan Baru estate. Not applicable.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	Based on the soil map and observation during the site visit, there was no peat soil No peat soil in Moynod estate and Terusan Baru estate. The drainability assessment is not applicable for both estate.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	Not applicable because from the Soil analysis and soil map, Moynod estate and Terusan Baru estate not have fragile or problem soils.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			

Criterion / Indicator		Assessment Findings	Compliance
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Water management plan was established by the SPO team for Ladang Sabah group of operating units. The plan, entitled "Water Management Plan for Ladang Sabah Grouping" is dated 4/10/2012 and last reviewed on 6/1/2019. The objectives of the plan is to conserve and to maintain the availability of surface and ground water. Hence, the management plan outlined the method to conserve and minimise pollution of water through implementation of various methods such as best practice of raw water & effluent treatment, maintaining riparian zone, management of land irrigation, maintaining soft vegetation in the field and water pollution preventions to name a few.	Complied
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	<p>Protection of water courses was addressed basically through pollution preventions and establishment of riparian zones. Based on site visit to the riparian zones in the estates, the zones were clearly demarcated at appropriate width and well maintained where no trace of agrochemicals observed. This is in line with the requirement of "Aku Janji" agreement with the Environmental Protection Department.</p> <p>The river water sampling analysis have been conducted by a consultant to comply one of the EIA's "Aku Janji" conditions through Environmental Compliance Report (ECR). Among the parameters analysed were TSS, OG, N, P and Turbidity.</p> <p>Mill upstream and downstream sampling points at Sg Muanad – Upstream: 5.76117, 117.58181 Downstream: 5.76195, 117.58162</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	The mill applies the biological system with 16 ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified where highest BOD=14.50 ppm while lowest was 9.30 ppm. Competent Person as required by legal was also verified. Currently, the responsibility is held by the mill manager, Certificate No. CePPOME/00087.	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water catchment by using water pump. As at Dec 2018, the average of 2.29 m ³ water was used to process one mt of FFB which is more than the established baseline value i.e. 2.00 m ³ /FFB for financial year 2018/19. The surge was due to experiment conducted for the new boiler chemicals and less supply of FFB due to replanting.	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	The IPM plan for Moynod estate only have for Beneficial plant programme. Latest record is on Dec 2018 for field 97F,97H,95C,95B,97Z and 97X and from the programme for Dec 2018 target is 1000M for planting Antigonan Leptopus and from the record 50% have been done. This record available under Beneficial Plan Program and progress record.	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training of those involved in IPM implementation was adequately demonstrated through training plan and records. In Moynod estate, training conduct by Ramsa Bin Miggi on 29 June 2018 on title IPM and Rat Cencus.	Complied
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment			

Criterion / Indicator		Assessment Findings	Compliance														
4.6.1	<p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.</p> <p>- Major compliance -</p>	<p>Justification of pesticides applied is available in the agriculture policies. Refer to Agricultural Policies, Section 6.0: Weeding-Weed Control and Section 9.0: Pest and Disease. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species as per below:-</p> <table border="1"> <thead> <tr> <th>Chemical Name</th> <th>Target Species</th> </tr> </thead> <tbody> <tr> <td>Glyphosate Isopropyl Amine (41% w/w)</td> <td>Tough grasses (imperata cylinderica , pennisetum sp. , Ischaemum sp.)</td> </tr> <tr> <td>2,4-D methyl amine (60% w/w)</td> <td>Asystassia sp.</td> </tr> <tr> <td>Metsulfuron methyl (20% w/w)</td> <td>Woodies and broad leaves weeds</td> </tr> <tr> <td>Triclopyr butoxy ethyl ester (32.1%)</td> <td>Woodies control and used as aboricides</td> </tr> <tr> <td>Fluoxypyr 1methyl heptyl (29/6%)</td> <td>Mikani micranta control</td> </tr> <tr> <td>Brodifacoum (0.003%) Floucoumafen (0.005%)</td> <td>Rodenticide @ rat control (2nd generation) As alternative chemical control for Rodenticide @ rat control (2nd generation)</td> </tr> </tbody> </table>	Chemical Name	Target Species	Glyphosate Isopropyl Amine (41% w/w)	Tough grasses (imperata cylinderica , pennisetum sp. , Ischaemum sp.)	2,4-D methyl amine (60% w/w)	Asystassia sp.	Metsulfuron methyl (20% w/w)	Woodies and broad leaves weeds	Triclopyr butoxy ethyl ester (32.1%)	Woodies control and used as aboricides	Fluoxypyr 1methyl heptyl (29/6%)	Mikani micranta control	Brodifacoum (0.003%) Floucoumafen (0.005%)	Rodenticide @ rat control (2nd generation) As alternative chemical control for Rodenticide @ rat control (2nd generation)	Complied
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Criterion / Indicator		Assessment Findings				Compliance
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The records of weeding programme and herbicide master list was sighted.				Complied
		Estate	Moynod	Terusan Baru Sdn Bhd	Laukin estate	
		Ai/Ha average	Total 0.909	0.8	0.91	
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the Group Standard Operating Procedure (StOP) and IOI Oil Palm Agricultural Policies. No prophylactic use of pesticides found at visited operating units.				Complied
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	There are no Class 1A and Class1B at the all visited estates during this assessment. Based on chemical register dated 30/12/18, only class III and IV chemical used in the estates.				Complied

Criterion / Indicator		Assessment Findings	Compliance															
4.6.5	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Pesticides were handled, used or applied by trained workers applied in accordance with the product label. Latest training for pesticides handler was conducted on 20 Feb 2018 in Terusan Baru estate. Appropriate safety and application equipment were provided and used, i.e 3M 3200/3200F, anti-fog goggles, apron and wellington boots. Sample of chemical safety data sheet (SDS) checked and available during site visit:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Activity</th> <th>Chemical using</th> <th>PPE</th> <th>Field</th> </tr> </thead> <tbody> <tr> <td>11 Dec 2018</td> <td>Circle and path</td> <td>Glyphosate, Kenlly, Matron</td> <td>Rubber boot, rubber glove, can vas, goggles and respirator</td> <td>94J(79 Ha)</td> </tr> <tr> <td>22/12/2018</td> <td>Circle spray</td> <td>Palmol, Kenlly and activator</td> <td>Rubber boot, rubber glove, can vas, goggles and respirator</td> <td>97M (42ha)</td> </tr> </tbody> </table>	Date	Activity	Chemical using	PPE	Field	11 Dec 2018	Circle and path	Glyphosate, Kenlly, Matron	Rubber boot, rubber glove, can vas, goggles and respirator	94J(79 Ha)	22/12/2018	Circle spray	Palmol, Kenlly and activator	Rubber boot, rubber glove, can vas, goggles and respirator	97M (42ha)	Complied
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4.6.6	<p>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).</p> <p>- Major compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.</p>	Complied															

Criterion / Indicator		Assessment Findings	Compliance
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Agricultural Policies, Section 6.0: Weeding-Weed Control and Section 9.0: Pest and Disease. The implementation in the field is consistent with the Agriculture Manual. Application record refer sampling in indicator 4.6.5	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	During site visit and interview with workers and management verified no record of aerially application happen in estate.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	There is no associated smallholder at Ladang Sabah POM Management Unit. Training records for staff and workers on chemical handling was made available as per the indicator 4.8.2.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	<p>Procedures for disposal of wastes materials were available for verification. Among the procedures are:</p> <ul style="list-style-type: none"> - <i>Peraturan bagi Penghantaran Buangan Terjadual (BT) bagi Ladang Sabah POM</i> (since Linbar 1 & 2 is sending their SW to Ladang Sabah POM) <i>or Sakilan POM</i> - Environmental Impact Assessment, Management Action Plans & Continuous Improvement Plan, dated January 2019 [Clause 1.1 Identification & Management Plan of Waste Products] - Scheduled Wastes Management Systems, dated 1/1/2015, IOI/SRO/HSE/SW/01, rev. 1/1/2017 <p>Apart from that, simple instructions on recycling campaign and no discriminate dumping of rubbish were also seen written on signage to create awareness among employees. Observations at line-site and interview with workers showed that they understood the right way of rubbish disposal.</p>	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Medical Surveillance done on 14 Dec 2018 by Dr Sanjay A/L Sadasivan (HQ/18/DOC/00/00201) from DAB OH Sdn Bhd. Total workers 32 person and 2 workers is recommend to be remove from chemical activities (Suharti (TRB3832) and Norma(TRB1914)). Letter for work transition have been issue on 16 Jan 2019	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There are women sprayers working at all visited estate. For those who were still within reproductive age, urine pregnancy test (UPT) was conducted by EHA to confirm and check the pregnancy status for those who exposed to chemical i.e store keeper, chemical mixer and sprayer.	Complied
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>			

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>Occupational Safety and Health Policy was established which has been signed by Group Plantation Director of IOI Corporation Berhad dated 11/7/2011. The Safety Management plans comprises of OSH legal compliance, emergency response plan (ERP), OSH management system, risk assessment, safety training, safety inspections and safety committee activities. Sample of OSH management system activities as follows:</p> <p>POM: OSH programme dated 14 Jan 2019 is prepared. This programmed include OSH meeting, WPI, Training and others. OSH meeting have been done quarterly by Mill. Latest meeting record is 19 December 2018 and previous meeting is on 8 October 2018 and 17 July 2018. From the minute meeting record, wpi done on 17 Dec 2018 and some issue regarding to empty container control. This issue been take care by management adequately. Audiometric test done on 8 June 2018 by DAB OH Sdn Bhd and 3 person found report under JKPP 7 (LSM0168,LSM0011,LSM0015) JKPP 8 (JKPP 8/17249/2018) record is available dated 20 Jan 2019. From the record found 8 incident record including hearing impairment.</p> <p>Medical surveillance done on 29 Sept 2018, 87 person have been sent and all are fit to work. Sampling full report of 3 people from Lab found a little Hexane been detected HIRARC have been reviewed on 20 July 2018 for accident on Emy Nurin LSM0598 (9 July 2018)</p> <p>CHRA (HQ/11/ASS/00/298-2018/146) by Dr Mohd Azizan Bin Abdul Aziz (HQ/11/ASS/00/298) from DAB OH Sdn Bhd. The examination, inspection and testing of local exhaust ventilation system report is done by DYNAKEY Laboratories Sdn Bhd (</p>	<p>Complied</p>
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RSPO Public Summary Report
Revision 7 (Aug /2018)

Criterion / Indicator	Assessment Findings	Compliance
	<p>IHT(II)/2018/0703/LSPOM) dated 3rd July 2018. Monthly check for LEV is done by Rosnah latest date is on 15 Jan 2019 and previously is on 10 Dec 2018 and 5 Nov 2018.</p> <p>In Moynod estate Medical Surveillance done on Dec 2018, from 22 person surveillance found 1 person (MYN0878) is not fit to work with chemical on 15 Jan 2019. The workers already been transfer refer letter on 15 Jan 2019 for work transfer.</p> <p>In Terusan Baru estate, OSH programme is available dated 28 December 2018. OSH meeting done on 19 Dec 2018 and previous meeting is on 12 Sept 2018 and 13 June 2018. Meeting conducted quarterly. From the meeting found 3 accident happen in estate on 8 Oct, 20 Oct and 12 Dec 2018 and from the accident found no major injury and no lost time injury happen.</p> <p>Appointment letter is available sampling on Abdul Halim Bin Achmat (Secretary) valid from 20 Jan 2018 until 20 Jan 2020. The organization chart is updated dated October 2018. HIRARC already been review on 19 Jan 2019 (Nasarudin) and also for accident for Nurbaya Bandu is on 10 Oct 2018.</p>	
4.7.2	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
4.7.3	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -	Complied
4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors. Emergency Response Plan included in the Safety Management Plans dated 5/1/18. List of emergency response plan established:</p> <ul style="list-style-type: none"> i) "Plan Tindakan Kecemasan Kebakaran" dated 1/12/17 ii) "Plan Tindakan Kecemasan Simbahan/Terkena Racun (Stor/Tempat Bancuhan)" dated 1/12/17 iii) "Plan Tindakan Kecemasan Simbahan/Terkena Racun (Di Dalam Kawasan Kilang)" dated 1/12/17 iv) " Plan Tindakan Kecemasan Traktor Perlandangan/Pemandu Lori" dated 1/12/17 v) " Plan Tindakan Kecemasan (Penyembur Racun / Pemotong Buah / Mem baja / Racun Tikus) Simbahan / Terkena Racun (Di Dalam Ladang) " dated 1/11/17 vi) "Plan Tindakan Kecemasan (Tumpahan Minyak Kelapa Sawit/Diesel/Minyak Pelincir" dated <p>Audiometric test done on 8 June 2018 by DAB OH Sdn Bhd and 3 person found report under JKKP 7 (Workers ID: LSM0168,LSM0011,LSM0015)</p> <p>JKKP 8 (JKKP 8/17249/2018) record is available dated 20 Jan 2019. From the record found 8 incident record including hearing impairment.</p> <p><u>In Moynod Estate</u></p> <p>Have 7 accident and have 2 JKKP 6 accident dated 29 March 2018 (SB/SKEM/18/0009)and 27 April 2018(SB/SKEM/180011). The compensation is done and pay properly.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings					Compliance																									
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. Sample of FWCS policy and SOCSO checked:- <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Insurance/SOCSO</th> <th>Validity</th> <th colspan="3">Operation Unit</th> </tr> </thead> <tbody> <tr> <td>DL-10106250-FWC from MSIG for 123 person SOCSO(Local Workers)</td> <td>1/10/2018-30/9/2019 Payment schedule, 8A for January 2019</td> <td colspan="3">Mill</td> </tr> <tr> <td>DL-10107046-FWC cover 219 SOCSO</td> <td>1/10/2018 – 30/9/2019 Payment schedule, 8A for January 2019</td> <td colspan="3">Moynod estate</td> </tr> <tr> <td>DL-10107975-FWC cover 202 person SOCSO</td> <td>1/10/2018-30/9/2019</td> <td colspan="3">Terusan Baru Sdn Bhd</td> </tr> <tr> <td>DL-10106371-WC cover 112 worker</td> <td>1/10/2018 – 30/9/2019</td> <td colspan="3">Laukin estate</td> </tr> </tbody> </table>					Insurance/SOCSO	Validity	Operation Unit			DL-10106250-FWC from MSIG for 123 person SOCSO(Local Workers)	1/10/2018-30/9/2019 Payment schedule, 8A for January 2019	Mill			DL-10107046-FWC cover 219 SOCSO	1/10/2018 – 30/9/2019 Payment schedule, 8A for January 2019	Moynod estate			DL-10107975-FWC cover 202 person SOCSO	1/10/2018-30/9/2019	Terusan Baru Sdn Bhd			DL-10106371-WC cover 112 worker	1/10/2018 – 30/9/2019	Laukin estate			Complied
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 & 8. Sample of accident statistic as shown below:- <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Year</th> <th>Mill</th> <th>Moynod estate</th> <th>Terusan Baru Sdn Bhd.</th> <th>Laukin</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>5 cases</td> <td>7 cases</td> <td>7 cases</td> <td>15 Cases</td> </tr> </tbody> </table>					Year	Mill	Moynod estate	Terusan Baru Sdn Bhd.	Laukin	2018	5 cases	7 cases	7 cases	15 Cases	Complied															
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Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.																																

Criterion / Indicator	Assessment Findings	Compliance
4.8.1	A formal training programme shall be in place that covers all aspects of the RSP0 Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	Ladang Sabah Certification Unit continued their training needs identification and programmes for the fiscal year 2018/19. Trainings were either conduct internally by its own staff or externally by other department within IOI Group or by consultant. Training records observed were updated and maintained. In general the identified trainings covered the aspects of safety, environment, best practices and social.

<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Records of training were well maintained at the visited operating units. For training latest is available;-</p> <ol style="list-style-type: none"> 1. Gas Analyzer training by Ahmad Mohd Raza on 18 Nov 2018 2. Company policy training on 24 Nov 2018 by Ahmad Mohd Raza 3. Contractor briefing regarding all policy including safety is on 2 December 2018 4. Safety on Threshing SOP training on 6 Dec 2018 by Fredik m Thobias 5. Laboratory training by Willie Salim on 10 December 2018 6. Hearing Conservation Programmed by Banister Muneh 7. Firedrill training by Jackcarry Suati & Larry Sitip on 18 Dec 2018 8. Sterilizer SOP training by Mr Fredik on 21 Sept 2018 9. PTW and Workshop is on 18 Oct 2018 by Mr Jackcarry Suati 10. First aid training on 23 July 2018 Mdm Maria Mahad(HA) 11. Confined space training & SCBA on 19 Oct 2018 by Mr Jackcarry <p>In Moynod</p> <ol style="list-style-type: none"> 1. Fire fighting date 5 September 2018 by Tharvind Sivasambo 2. First Aid date 14 November 2018 by Nurfatizah stanly Mohamed (MA) 3. Chemical handling training date 15 Oct 2018 by Kordiman Karading 4. Policy training date 24 July 2018 by Kordiman Karading 5. Manuring training date 14 July 2018 by Mohd Rizuan Hj Ismail 6. Safety briefing for contractor date on 13 March 2018 by Mohd Rizuan Hj Ismail <p>In Terusan Baru</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. Firedrill training 19 Jan 2018 by Assistant 2. Spraying training on 19 Feb and 6 march 2018 3. Company policy on 27 Feb 2018 4. FFB contractor training and briefing 21 August 2018 5. Safety in Genset training on 28 march 2018 6. Chemical handling and Spillage ERP on 29 Nov 2018 7. Manuring Training on 26 March 2018 	
<p>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</p>			
<p>Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p>EIA was done internally by each operating unit covering all activities. The EIA is reviewed yearly. Action plans, Monitoring and Continuous Improvement Programme were established thereafter.</p> <p>EIA has been conducted for replanting of 16,688 Ha within Ladang Sabah Group Estates by an authorised consultant (Kiwiheng Environmental Consultants Sdn Bhd (EPD Reg: F007). Environmental Compliance Visit for 2018 have been conducted three times a year as required in "Surat Aku Janji" [JPAS/PP/02/600-1/11/1/117, dated 30/3/2012]. From the compliance visit report, the consultant had identified a few issues such as water pump (electricity powered) house is situated in the riparian zone, silt pit near nursery was not properly maintained, workers quarters located lesser than 50m from the river bank and traces of oil found on the ground. The estates have taken appropriate actions to correct the findings and recorded in "Action Plan for the Non-compliance on Environmental Conditions under ECR by Kiwiheng Consultant.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	Mitigation measure is established based on identified significant aspect from the environmental aspect and impact evaluation. The mitigation measures were incorporated through various mechanism such as implementation of standard and/or safe operating procedure, implementation of emergency response plan, water management plan, wastes management plan, bio-diversity management plan, implementation of 3R to name a few.	Complied
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -	The mill and estates were consistently monitoring its effectiveness of mitigation measures through various mechanism such as analysis of ETP final discharge, analysis of monsoon drain discharge, analysis of river water quality (through ECR), scheduled & recyclable wastes movements, and monitoring of smoke emissions through CEMS and stack sampling, to name a few.	Complied
Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.			
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	The HCV reassessment for Ladang Sabah Complex had been conducted internally where report entitled "High Conservation Value Assessment Management Action Plans & Continuous Improvement Plans" dated January 2018 was prepared. The assessment has also involved the relevant stakeholder such as the Sabah Forest Department and Sabah Wildlife Department. Based on the assessment, it has covered the certification unit's landscape level. Among the conservation identified includes natural waterways (river and tributaries), forest reserves (Luangmanis and Segaliud Lokan) and steep terrain areas.	Complied

Criterion / Indicator	Assessment Findings	Compliance
5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	Among the measures taken to maintain and enhance the HCV and potential RTE presence include the erection of no hunting and no trespassing signboards, markings and regular patrol by estate AP. Additional measures also included the continuous programme such as maintenance of markings at the conservation areas and training of HCV awareness to all employees and stakeholders.	Complied
5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Awareness programme on HCV which includes the RTE status was carried out through briefing during stakeholders meeting and training to employees. At Moynod estate, the latest briefing to workers with regards to HCV was conducted on 22/11/2018. Latest meetings with stakeholders were conducted on 3&4/12/2018. Records of attendance and minutes of meeting were available for verification. Based in interview with workers, it was noted that the level of awareness found to be satisfactory.	Complied
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	On-going monitoring of the management plan on the status of any RTE species at the plantation areas was regularly conducted. Reports were collated and reviewed by the compliance team for the operating units situated within the region. The updated reports available indicated that there have been no sightings of any RTE species at the operating units.	Complied
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	No HCV with existing rights of local communities was identified that needs to be set aside.	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Wastes products and sources of pollutions were identified and documented in Environmental Impact Assessment, Management Action Plans & Continuous Improvement Plan, dated January 2019. The document was available for verification at all of the visited estates.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.2</p> <p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>All agrochemical containers were triple rinsed & punctured and thereafter sent to recognised collector e.g. Newgates Industries (Borneo) Sdn Bhd. Some receipts have been sampled for verification e.g. No. 1531, dated 13/12/2018, quantity 157 kg from Moynod Estate, No. 1523, dated 13/12/2018, quantity 180 kg from Terusan Baru Estate and No. 1507, dated 1/11/2018, quantity 530 kg from Laukin Estate.</p> <p>Scheduled wastes from the estates are centrally accumulated at the mill and disposed through authorised vendors thereafter. This practice has been approved by the DOE [ref.: Letter dated 23/1/2018, ASSH(B)91/110/619/001 Jld 22 (85)] – Requesting Permission to Gather Scheduled Wastes at One Common Collection Centre at Each Group] to IOI Plantation Service Sdn Bhd, Sandakan Regional Office.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Waste management and disposal plan has been included in the environmental management plan. All operating units have Pollution Prevention Plan which incorporated with documented Environmental Impacts Identification and Continuous Improvement Plan. Implementation of the disposal can be seen through verification of receipts from recycle centers, consignments notes for scheduled wastes and visits of landfill facility. Some receipts have been sampled e.g. #13172, dated 17/1/2019, 79 kg of paper/plastic bottles/etc. from Moynod Estate to City Express Recycling Sdn Bhd., #35049, dated 4/1/2019, 22 kg of paper/box/plastic bottles from Terusan Baru Estate to City Express Recycling Sdn Bhd and receipt dated 30/10/2018, 39 kg of paper/box/plastic bottles from Laukin Estate to City Express Recycling Sdn Bhd.</p> <p>Apart from that, the management has also organized an annual competition among the employees on who can collect recyclable wastes the most. E.g. at Laukin Estate, the event was last conducted in October 2019.</p>	<p>Complied</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

Criterion / Indicator		Assessment Findings	Compliance
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	Plan for improving efficiency of fossil fuel was spelt out in Environmental Impact Assessment, Management Action Plans & CIP. Among the plans established by the operating units were: - avoid purchasing second grade diesel from unauthorised dealers that contain high sulphur content - regular service of tractors for smooth running of engines - the usage of methane gas from POME instead of fossil fuel to generate electricity Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.	Complied
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	There was no evidence of burning for the purpose of land preparation for replanting.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	No evidence that fire has been used for preparing land. Palms that were felled during replanting were chipped, windrowed and left to decompose in the field.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

Criterion / Indicator		Assessment Findings	Compliance
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate. Sampled Boiler stack sampling records: Boiler no.1 – 1st half 2018, ref# RS/STACK/18-002, date of sampling 17/1/18: result 365.66 mg/Nm ³ Boiler no.1 – 2nd half 2018, ref# RS/STACK/18-069, date of sampling 13/8/18: result 367.74 mg/Nm ³	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH ₄) emission through POME treatment. Ladang Sabah has its methane capture facilities in POME treatment pond since July 2015. The methane gas has been used to generate electricity through operation of bio-gas plant. Last financial year, (2017/18) the electricity supplied to labour quarters by the plant was 2,186,138 kWh. Other less significant GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical and fertilizer consumptions.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
5.6.3	<p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>RSPO GHG Calculator was used. The data input in the RSPO GHG calculator was found to be accurate though verification of the following documents:</p> <ul style="list-style-type: none"> - Summary of diesel usage - daily diesel issue & stock record - monthly Stock Movement History - monthly production report (for kWh generated by bio-gas plant and POME produced) - Daily Power Consumption Records for Bio-gas Plant (for kWh generated by bio-gas plant) - Flowmeter and Running Hours Record Book (LSPOM) - Monthly Stock Issues (system Pinfosys) - Fertilizer stock book - Proof list for stock issue (monthly) - Store Requisition Note cum Issue Book - mill's Vehicle/Engine Running Expenses Summary 	<p>Complied</p>
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>			
<p>Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Annual Review for Social Impact Assessment was conducted on 15/1/2019 by Social Liaison Officer of mill and estates. The issues on social were obtained inputs from stakeholder meetings with internal and external stakeholders. The issues were incorporated into social impact assessment and management action plan. The stakeholder meetings were carried as indicated in Indicator 6.2.3. Issue of unauthorized dependents to stay in the estates was identified in the assessment report.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The assessment was carried out with the participation of stakeholders during the internal and external stakeholder meetings. Seen the meeting minutes and attendance lists of the meeting.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Annual review for Social Impact Assessment – Management Action Plans & Continuous Improvement Plan was conducted. Stateless dependent living inside the workers’ housing was identified in the Social Impact Assessment and Management Action Plan. However, the negative and positive impacts identified for the issue were inappropriate and management action to monitor and execute to minimize and control the issue could be further improved.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	Management Action Plans & Continuous Improvement Plan was developed and reviewed on yearly basis. The last reviewed in the mill was on 15/1/2019, 31/12/2018 in Moynod Estate, 15/1/2019 in Terusan Baru Estate and 2/1/2019 in Laukin Estate.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There was no scheme smallholders involve in the certification unit.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	IOI Corporation Berhad has developed Stakeholder Request Procedure for Corporate Level and Estate Level. The flowchart has detailed out the process of request by the stakeholders. Stakeholders can access to www.ioigroup.com , call IOI Group General Line or write formal letter to Head Office of IOI if they have any requests or complaints. The stakeholders need to be informed of outcome within 5 working days.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The Assistant Manager of POM and Assistant Manager of Laukin Estate has been appointed as Social Liaison Officer and appointment letter dated 16/3/2017 was sighted. Role of the Social Liaison Officer has been attached together with the appointment letter.
		Complied

<p>6.2.3</p>	<p>A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -</p>	<p>Stakeholder list was developed which has included the stakeholders such as local communities, smallholders, government authorities, NGOs, contractors and suppliers. The stakeholder list was last updated on 30/11/2018 in Ladang Sabah POM.</p> <p>Stakeholder meeting with all the contractors was conducted on 3/12/2018 for IOI Ladang Sabah and Sakilan Group. The contractors were briefed on the RSPO, ISCC and MSPO certification during the meeting. Policies, complaint and request procedures were briefed to the contractor as well. Materials of the meeting were sighted. The contractors have raised negative and positive impacts to the management and action plan was developed.</p> <p>Besides, stakeholder meeting with other stakeholders such as government authorities, suppliers, school's representatives and sundry shop owners was conducted on 4/12/2018. Impacts that raised by the stakeholders were incorporated into the action plan. The action plan has included the positive and negative impacts raised by the stakeholders.</p> <p>Internal stakeholder meeting with the mill's workers was carried out on 29/10/2018 where they have been briefed on the sustainability certification, policies and employment contract. Review of the previous issues was conducted during the meeting by updating the status of the issues to the workers. All the previous issues were resolved accordingly. There were negative and positive issues raised during the meeting and they have been incorporated into action plan. For eg:</p> <ul style="list-style-type: none"> a. Issue: Some of the FFB drivers did not equip with proper PPE such as safety vest. Action to be taken: Management will issue memo to the FFFB driver. 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		Status: The memo was issued and displayed at the Security Post which effective on 1/11/2018. Besides, Security will have carried out FFB transporter inspection based on the checklist where safety vest needed to be wear when enter the mill.	
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	IOI Corporation Berhad has developed and implemented Whistleblowing Policy, revised on November 2017 where the objective of the policy is to provide an avenue for all employees of IOI Group and all other stakeholders to raise concerns about any improper conduct within IOI Group. The policy is designed to provide transparent and confidential process for dealing with concerns. The policy has ensured protection to whistle-blowers where the person may choose to remain anonymous when reporting. The whistleblowing investigation shall be completed within 2 weeks from date of receiving the whistleblowing. The channel of whistleblowing has clearly stated in the policy.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	<p>Ladang Sabah POM has implemented Complaint/ Grievance Book. Besides, the mill has implemented Request for Housing Repair Form where the workers lodged complaint regarding housing defect. Sampled the request forms as below:</p> <p>a. House No.: P3 dated 3/12/2018 Issue: Mosquitoes' netting was broken; hinges of toilet door need to be replaced. Action: The management has ordered the netting on 11/12/2018 and received goods on 18/12/2018. The carpenter has carried out repair work and acknowledged on 21/12/2018.</p> <p>Terusan Baru Estate has implemented Complaint/ Grievance Book to record whatever requests and complaints by stakeholders. Sampled of the complaint as below:</p> <p>a. House No.: Block 4 No. 2 dated 26/12/2018 Issue: Defect in the socket and lighting in the house. Action: Seen the Job Order# 0445 dated 27/12/2018 and Electrical Daily Report that the electrician has carried out repair work at the respective house and the complainant has acknowledged on the complaint record on 27/12/2018 after issue has been rectified.</p>	Complied
<p>Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	IOI Corporation Berhad has developed Grievance Procedure for Land Owner Issues flowchart that has detailing the process of negotiation and compensation if there is any land dispute. Compensation shall be with mutually agreed prices, terms and conditions.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP as per indicator 6.4.1. Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	There was no case of compensations occurred as there was no land dispute reported by the local communities and smallholders verified through interviewed with the stakeholders. Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct employment. The payslip has included basic pay, allowances and working days. Payslip for January 2018, February 2018, August 2018, October 2018 and December 2018 was sampled based on the crop summary as below:</p> <ul style="list-style-type: none"> a. Employee No.: LSM0576 (LSPOM) b. Employee No.: LSM0467 (LSPOM) c. Employee No.: LSM0377 (LSPOM) d. Employee No.: LSM0560 (LSPOM) e. Employee No.: LSM0152 (LSPOM) f. Employee No.: MYN3575 (ME) g. Employee No.: MYN0079 (ME) h. Employee No.: MYN0361 (ME) i. Employee No.: MYN0839 (ME) j. Employee No.: TRB1100 (TBE) k. Employee No.: TRB3892 (TBE) l. Employee No.: TRB3865 (TBE) m. Employee No.: TRB7002 (TBE) n. Employee No.: LKN0579 (LE) o. Employee No.: LKN0698 (LE) p. Employee No.: LKN4247 (LE) <p>Sampled of the payslip for contractors' workers from October 2018 to December 2018 as below and have achieved Minimum Wage Order 2016:</p> <ul style="list-style-type: none"> a. Passport No.: AU 117867 (ME – Road Graveling) b. Passport No.: AS 517383 (ME – Road Graveling) c. Passport No.: AU 092890 (ME – Road Graveling) d. Passport No.: AU 267198 (TRB – Driver FFB transporter) e. Passport No.: AU 267198 (TRB – Driver FFB transporter) f. Passport No.: AS 379133 (LE – Driver FFB transporter) g. I/C No.: 791104-XX-60XX (LE – Driver FFB transporter) 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>h. I/C No.: 600521-XX-50XX (LE – Driver FFB transporter)</p> <p>All the sampled workers have achieved Minimum Wage Order 2016. The workers have been paid overtime according to the Act.</p> <p>The operating units have received memorandum from IOI Plantation Services Sdn Bhd dated 13/12/2018 regarding the change of minimum wage to RM 1100 with effective from 1/1/2019. The memorandum has been briefed to the workers regarding the changes on 18/12/2018 during muster call in Terusan Baru Estate.</p>	

<p>6.5.2</p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p>	<p>Employment contract are available and explained in language that understood by workers. Terms and conditions such as working hours, rest day, wages, annual leave and medical leave were clearly stated in the contract. The contract was signed by the workers and sampled of contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: LSM0609 (LSPOM) b. Employee No.: LSM0260 (LSPOM) c. Employee No.: LSM0347 (LSPOM) d. Employee No.: LSM0061 (LSPOM) e. Employee No.: LSM0377 (LSPOM) f. Employee No.: MYN4135 (ME) g. Employee No.: MYN3575 (ME) h. Employee No.: MYN1637 (ME) i. Employee No.: TRB2703 (TBE) j. Employee No.: TRB6841 (TBE) k. Employee No.: TRB3892 (TBE) l. Employee No.: TRB6827 (TBE) m. Employee No.: LKN0661 (LE) n. Employee No.: LKN0579 (LE) o. Employee No.: LKN0801 (LE) p. Employee No.: LKN4247 (LE) <p>Contractors' workers that employed and carried out in the estates have been signed on the employment contracts and sampled as below:</p> <ul style="list-style-type: none"> a. Passport No.: AU 117867 (ME's Contractor Worker) b. Passport No.: AU 117867 (ME's Contractor Worker) c. Passport No.: AU 117867 (ME's Contractor Worker) d. Passport No.: AU 267198 (TBE's Contractor Worker) e. Passport No.: AS 379133 (LE's Contractor Worker) f. Passport No.: EB 9044015 (LE's Contractor Worker) 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.	
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	The mill and estates’ management have provided free housing with water and electricity to all the workers. Medical facilities were provided to the workers and their dependents. Schools such as HUMANA and CLC were available in the management’s compound. Management of Ladang Sabah POM has carried out fogging whenever necessary and the last fogging activity was carried out on 18-19/12/2018. Besides, the estates’ management has in the progress of construct new labour quarters for the workers.	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	There were sundry shops available in the premises of mill and estates. The management has made effort to monitor and improve the workers’ access to adequate, sufficient and affordable foods. Interviewed with the workers confirmed that the pricing in the sundry shops were acceptable and there was <i>Pasar Tamu</i> once a month during the pay day for them to purchase for goods and foods.	Complied
<p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

Criterion / Indicator		Assessment Findings	Compliance
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	IOI Group has developed and implemented Equal Opportunity Employment & Freedom of Association Policies dated October 2017 in both languages where the company respects the freedom of association and collective bargaining to the workers. The workers have the right to join or form trade unions of their own choosing without prior authorization and to bargain collectively. The policy has been displayed at notice board in office. Briefing of the policy was conducted during internal stakeholder meetings on 29/10/2018 and to all the workers on 24/11/2018 in Ladang Sabah POM and 1/8/2018 in Terusan Baru Estate.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Ladang Sabah POM and estates have established Joint Consultative Committee (JCC) and Employee Consultative Committee (ECC) and meeting was conducted once every two months. The last ECC meeting was conducted on 17/12/2018 to collect information from the committee in order to discuss during JCC meeting on 18/12/2018 in Ladang Sabah POM and 12/12/2018 in Laukin Estate. The information was recorded in the <i>Borang Pengumpulan Maklumat Mesyuarat Jawatankuasa Perundingan Pekerja</i> . The issues raised by the workers were incorporated into action plan. The issues raised from previous meeting was resolved and updated during the last meeting.	Complied
Criterion 6.7: Children are not employed or exploited.			

Criterion / Indicator		Assessment Findings	Compliance
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	IOI Group has developed and implemented Sustainability Palm Oil Policy dated March 2018 where the company eliminates child labour in the company. Reviewed of the name list of workers found that the workers recruited with minimum age of 18 years old. The policy has been displayed at notice board in office. Briefing of the policy was conducted during internal stakeholder meetings on 29/10/2018 and to all the workers on 24/11/2018 in Ladang Sabah POM and 1/8/2018 in Terusan Baru Estate. During site visit found that no child labour was in used and cross-checked by interviewed with Crèche Attendants and workers.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	IOI Group has implemented Equal Opportunity Employment & Freedom of Association Policies dated October 2017 in both languages where all the workers will receive equal treatment based on their relevant merits and competency regardless of gender, race, caste, nationality, religion, age, physical condition, sexual orientation, marital status, union membership or political affiliation. The policy has been displayed at notice board in office. Briefing of the policy was conducted during internal stakeholder meetings on 29/10/2018 and to all the workers on 24/11/2018 in Ladang Sabah POM and 1/8/2018 in Terusan Baru Estate.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Interviewed with the workers consisted of different nationalities and different gender confirmed that they are treated equally without any discrimination. The workers were provided with standard treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	The company has practices to conduct medical check-up prior recruitment of workers or continue of employment of workers as per the Procedure of Recruitment of Workers. If the result of FOMENA found unfit, the workers will be repatriate. The recruitment of workers will be based on the medical fitness of workers. Interviewed with the workers found that no unfair recruitment has occurred in the company.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	The company has implemented Policy on Harassment at Workplace dated June 218 where the company is committed to promote a safe and healthy working environment. The company has zero tolerance for any form of harassment at workplace. The policy serves as a guidance on handling matters related to harassment. The policy has been displayed at notice board in office. Briefing of the policy was conducted during internal stakeholder meetings on 29/10/2018 and to all the workers on 24/11/2018 in Ladang Sabah POM and 1/8/2018 in Terusan Baru Estate.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	The company has implemented IOI Group Sustainable Palm Oil Policy dated March 2018 that the company is respect and uphold the rights of employees in accordance with Universal Declaration of Human Rights, International Labour Organization's core convention. According to Article 16, the workers is freely to marry and to found family. The policy has been displayed at notice board in office. Briefing of the policy was conducted during internal stakeholder meetings on 29/10/2018 and to all the workers on 24/11/2018 in Ladang Sabah POM and 1/8/2018 in Terusan Baru Estate.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.9.3	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p> <p>IOI Plantation Services Sdn Bhd has developed and implemented Guideline for Gender Consultative Committee, SPO/SDK/S/001-2017 dated 25/9/2017 where the function of the committee has been clearly outlined in the procedure. Besides, the policy has ensured that the victim can be remained anonymous and will not be subject to any form of retaliatory action for submitting the complaint. All grievances submitted will remained as confidential.</p> <p>Gender Committee was established in the mill and estates to monitor the gender issues. The last meeting was conducted on 13/10/2018 in Ladang Sabah POM and 12/12/2018 in Laukin Estate. No issue of sexual harassment or violence has been reported.</p> <p>Interviewed with the females' workers and housewives confirmed that no case of sexual harassment was reported. They are aware of the complaint procedure if they have encountered any issue.</p>	Complied
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p> <p>Ladang Sabah POM has only received and processed FFB from own certified supply bases. No purchase of FFB from smallholders.</p>	Complied
6.10.2	<p>Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p> <p>Ladang Sabah POM has only received and processed FFB from own certified supply bases. No purchase of FFB from smallholders.</p>	Complied

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6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	<p>Sampled of contracts with contractors as below:</p> <ul style="list-style-type: none"> a. Company No.: 916492-U for transporting CPO which valid from 1/7/2016 to 30/6/2019. b. Company No.: 244758-D for transporting CPO which valid from 1/7/2016 to 30/6/2019. c. Contract No.: MYN/18-19/004 for transporting FFB which valid from 1/7/2018 to 30/6/2019. d. Contract No.: TRB/006-18/19 for transporting FFB and EFB which valid from 1/7/2018 to 30/6/2019. <p>Contract No.: LKN/007/2018-2019 for hiring excavator to carry out road maintenance which valid from 1/7/2018 to 30/6/2019.</p>	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	<p>According to the contract of CPO transporter, the transporter has to submit invoice for his transport service at the beginning of each month for payment. IOI will carry out verification and make payment not later than 15 days after the receipt of transporter's invoice. The payment will be made by Head Office.</p> <p>Payment records for the FFB transporter sampled as below:</p> <ul style="list-style-type: none"> a. INV# 00028 dated 30/11/2018; Payment Voucher # 04/12 dated 10/12/2018. b. INV# I-00000335 dated 30/11/2018; Payment Voucher # 003/12 dated 13/12/2018. c. INV# SPAS-004/010/18-19 dated 31/10/2018; Payment Voucher # 003/11 dated 10/11/2018. d. INV# SPAS-005/011/18-19 dated 30/11/2018; Payment Voucher # 004/12 dated 10/12/2018. 	Complied
<p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p>			

Criterion / Indicator		Assessment Findings	Compliance
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Ladang Sabah POM and estates have made contribution to the communities such as assisted the hospital to organize blood donation campaign in the mill compound, provide the usage of community hall to HUMANA, provide school bus to send the children to neighboring school for special event and provide free school bus to send the children to schools. Besides interviewed with the teachers confirmed that the management has provided assistance to repair the school defects as per request.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	There is no scheme smallholders involve in the certification unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			

<p>6.12.1</p>	<p>There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below:</p> <ul style="list-style-type: none"> a. Permit No.: PE 0668759 valid until 22/5/2019 (LSPOM) b. Permit No.: PE 0271084 valid until 13/3/2019 (LSPOM) c. Permit No.: PE 6526732 valid until 5/9/2019 (LSPOM) d. Permit No.: PE 0668757 valid until 22/5/2019 (LSPOM) e. Permit No.: PE 0271078 valid until 13/3/2019 (LSPOM) f. Permit No.: PE 6522780 valid until 22/9/2019 (ME) g. Permit No.: PE 6522499 valid until 29/7/2019 (ME) h. Permit No.: PE 6527021 valid until 29/1/2020 (ME) i. Permit No.: PE 6521861 valid until 2/7/2019 (ME) j. Permit No.: PE 2034298 valid until 31/10/2019 (ME's Contractor's Worker) k. Permit No.: PE 2034295 valid until 31/10/2019 (ME's Contractor's Worker) l. Permit No.: PE 1849673 valid until 30/9/2019 (ME's Contractor's Worker) m. Permit No.: PE 1487429 valid until 24/2/2019 (TBE) n. Permit No.: PE 6527069 valid until 29/11/2019 (TBE) o. Permit No.: PE 6524285 valid until 23/10/2019 (TBE) p. Permit No.: PE 6526735 valid until 4/10/2019 (TBE) q. Permit No.: PE 6526911 valid until 29/7/2019 (LE) r. Permit No.: PE 0057925 valid until 25/2/2019 (LE) s. Permit No.: PE 6526867 valid until 29/7/2019 (LE) t. Permit No.: PE 0270353 valid until 13/5/2019 (LE) <p>Interviewed with the workers confirmed that they are not restricted to move around by the company. They have the freedom to choose to keep the passport by themselves or keep in the office for safety purpose. The workers are keeping the passport by themselves. They</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>have signed on a consent letter that they will be keeping passport by themselves unless 3 months prior to expiry of permit, they need to submit the passport to management for renewal.</p> <p>Besides, the company has implemented Foreign Workers Recruitment Guideline & Procedure in Malaysia revised on July 2018 where</p>	
6.12.2	<p>Where applicable, it shall be demonstrated that no contract substitution has occurred.</p> <p>- Minor compliance –</p>	<p>Interviewed with the workers confirmed that no contract substitution has occurred.</p>	Complied
6.12.3	<p>Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.</p> <p>- Major compliance -</p>	<p>IOI Group has developed Sustainable Palm Oil Policy dated March 2018 and Foreign Workers Recruitment Guideline & Procedure in Malaysia revised on July 2018 where the company has provided induction and orientation training to the workers on the employment contract, wages, benefits such as medical leave and overtime, rules and regulation, safety training and Malaysia’s culture. Besides, the company provide fair and equal employment opportunities to all workers and provide decent living condition through verified during on site visit to the linesite. Seen the induction training records for the new employees.</p>	Complied
<p>Criterion 6.13: Growers and millers respect human rights.</p>			

Criterion / Indicator		Assessment Findings	Compliance
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	IOI Group has developed Sustainable Palm Oil Policy dated March 2018 where the company respects and uphold the rights of all workers, including contract, temporary and migrant workers in accordance with the Universal Declaration of Human Rights, International Labour Organization’s core conventions, United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labour in Palm Oil Production. The policy has been displayed at notice board in office. Briefing of the policy was conducted during internal stakeholder meetings on 29/10/2018 and to all the workers on 24/11/2018 in Ladang Sabah POM and 1/8/2018 in Terusan Baru Estate.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	HUMANA and CLC was established in the mill and estates in Ladang Sabah certification unit. Building was constructed and maintained by the estates’ management. Facilities such as tables and chairs were provided by the management as well. The company also provided free school bus to send the children to school.	Complied
Principle 7: Responsible development of new plantings			
Ladang Sabah Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. - Major compliance - 	<p>Continual improvement plan for FY2018/19 implementation observed;</p> <p><u>Ladang Sabah POM</u></p> <p><u>Social:</u></p> <ul style="list-style-type: none"> - Renovation of futsal court - Conversion of ex-Chapel to indoor games house - Newly constructed multipurpose hall - Parking lots for workers - Provision of surau at mill office <p><u>Environment</u></p> <ul style="list-style-type: none"> - New water treatment clarified and overhead tank - Electro-static Precipitator (ESP) boiler smoke - New CEMS program with I-remote from DOE - Improved drainage system for labour quarters - Tree planting at football field and flower planting at executive houses - Recycle waste collection centre at labour quarters <p><u>Occupational safety & health</u></p> <ul style="list-style-type: none"> - Heavy duty LED lighting at bulking storage tanks for clearer vision during night - Provision of fire extinguisher at company's vehicles - Additional 1st aid kit box for ETP operator - Anchoring and lifeline system – to attached the safety harness - Safety net digester tank at bio-gas plant 	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd (June 2018)

No.	PMU	Main assessment	Certification status	Status	Updated Information for Partial Certification, Clause 4.2.4 RSPO Certification Systems for Certified and Uncertified Units
1.	Pamol (Sabah) POM, Sabah	May 2008	Recertified in November 2016	Included Sugut Estate as an additional supply base through the scope of certification extension in September 2017 RSPO ASA-01.	No outstanding issues
2.	Sakilan POM	Nov 2008	Recertified in Mar 2015	ASA-03 completed in December 2017.	No outstanding issues
3.	Pamol Kluang POM	Mar 2009	Recertified in Mar 2015	ASA-03 completed in Dec 2017.	No outstanding issues
4.	Gomali POM	Aug 2009	Recertified in Aug 2015	ASA-02 completed in June 2017.	No outstanding issues
5.	Baturong POM	Sept 2009	Recertified in Oct 2015	ASA-02 completed in July 2017.	No outstanding issues
6.	Bukit Leelau POM	Apr 2010	Recertified in Nov 2015	ASA-02 completed in September 2017.	No outstanding issues
7.	Mayvin POM	Aug 2010	Recertified in Dec 2015	ASA-02 completed in October 2017.	No outstanding issues
8.	Pukin POM, Pahang	Dec 2010	Recertified in June 2016	ASA-02 completed in March 2018.	No outstanding issues
9.	Leepang (Sabah) POM	Aug 2012	Recertified in dec 2013	ASA-04 completed in October 2017.	No outstanding issues
10.	Syarimo POM	Sept 2012	Recertified in Mar 2018	Recertification audit completed in January 2018.	No outstanding issues
11.	Ladang Sabah POM	Oct 2012	Recertified in July 2018	Recertification audit completed in January 2018.	No outstanding issues
12.	Morisem POM, Sabah	Sept 2013	Certified in Dec 2013	ASA-04 completed in	No outstanding issues

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No.	PMU	Main assessment	Certification status	Status	Updated Information for Partial Certification, Clause 4.2.4 RSPO Certification Systems for Certified and Uncertified Units
				September 2017.	
13.	IOI – Pelita, Sarawak	Planned - 2020	Uncertified Unit	New certification for IOI – Pelita (Sarawak) is pending resolution of land dispute and RSPO decision. No POM yet.	<p>Two meetings in March and April 2018 has been held with RSPO and Grassroots to determine the direction of the resolution plan and IOI had addressed every concern and omments raised by the Complaints Panel (CP).</p> <p>Two socialization process to determine the best mechanism to handle dispute cases has been done with the all respective communities has been conducted in March 2018 collecting feedback and comments from the communities regarding the workplan.</p> <p>The revision of the resolution plan has took place in April 2018 which involving the involvement of more stakeholders including authorities to come on board and resolve the dispute case. The first measures to be taken on the ground is to conduct the perimeter survey and community mapping, which IOI has hired two new field staff to conduct such activities once they are on board in early May 2018.</p> <p>In addition, Corporate Social Responsibility (CSR) activities is actively being conducted on the ground such as road repairs in Long Teran, Long Tuyut, and Long Jegan road. The construction materials to the local communities in Long Teran Batu has also been delivered in mid May 2018 before Gawai festival.</p> <p>Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/status-of-complaints/view/4</p>
14.	Unico POM-1, Sabah	Planned - 2018	Uncertified Unit	Acquired in 2014. Established OP plantation (before 2005). Supply base do consist of external/independent smallholders.	<p>Undergo its first RSPO Audit on (09th – 13th April 2018)</p> <p>Outgrowers are not part of the main assessment whereas risk assessment was conducted during the audit.</p>

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No.	PMU	Main assessment	Certification status	Status	Updated Information for Partial Certification, Clause 4.2.4 RSPO Certification Systems for Certified and Uncertified Units
15.	Unico Desa POM-2, Sabah	Planned - Dec 2017	Uncertified Unit	Acquired in 2014. Established OP plantation (before 2005). Supply base comprised of own estates.	No outstanding issues Outgrowers are not part of the certified area
16.	PT SKS, Indonesia	Planned - 2017	Uncertified Unit	Acquired in 2009 (new concession land). POM was commission in Feb 2015 and Governmental 'Hak Guna Usaha' (HGU) application in progress.	Update on the RSPO Suspension and complaint by Aidenvironment – Final verification by RSPO CP was conducted in end of January 2018. Final report on the feedback from the verification visit is yet to be shared by the RSPO CP. Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/status-of-complaints/view/80 Certification preparations in progress. Pending issuance of HGU.
17.	PT BNS, Indonesia	Planned - 2017	Uncertified Unit	Acquired in 2009 (new concession land). POM was commission in Feb 2015 and Governmental HGU application in the process.	Update on the RSPO Suspension and complaint by Aidenvironment – Final verification by RSPO CP was conducted in end of January 2018. Final report on the feedback from the verification visit is yet to be shared by the RSPO CP. Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/status-of-complaints/view/80 Certification preparations in progress. Pending issuance of HGU.
18.	PT BSS, Indonesia	Planned 2019	Uncertified Unit	Acquired in 2009 (new concession land). No POM yet, still in development phase. Governmental 'Hak Guna Usaha' application in progress.	Update on the RSPO Suspension and complaint by Aidenvironment – Final verification by RSPO CP was conducted in end of January 2018. Final report on the feedback from the verification visit is yet to be shared by the RSPO CP. Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/status-of-complaints/view/80 Certification preparations in progress. Pending issuance of HGU.
19.	PT KPAM, Indonesia	Planned - 2020		Acquired in 2010 (new concession land).	RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP

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No.	PMU	Main assessment	Certification status	Status	Updated Information for Partial Certification, Clause 4.2.4 RSPO Certification Systems for Certified and Uncertified Units
				No POM planned yet, all necessary permits are up to date.	public notification could be assessed through the link below: https://rspo.org/certification/new-planting-procedures/public-consultations/loi-group-pt-kalimantan-prima-agro-mandiri HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below: http://highcarbonstock.org/registered-hcs-assessments/
20.	Sugut Estate, Sabah	Planned – Sept 2017	Certified in November 2017	Sugut estate was included as part of the Pamol Sabah POM supply base and has been audited by Certification Body, Intertek on 12 th Sept 2017. RSPO certification has been successfully granted beginning November 2017.	No outstanding issue.

*Previously certified under multi mill certification. The recertification changed to single mill and its supply base

Appendix C: GHG Reporting Executive Summary

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

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

The summary of the Net GHG emitted in 2018 for Ladang Sabah POM and supply base are as following:

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

Extraction	%
OER	20.61
KER	5.54

Production	t/yr
FFB Process	385,776.41
CPO Produced	79,514.48
PKO Produced	21,370.25

Land Use	Ha
OP Planted Area	22,895.00
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	205.73
Total	23,100.73

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
Land Conversion	157,615.4	0.42	2,388.72	0.39	-	-	160,003.72	-
CO ₂ Emission from fertilizer	5,201.29	0.01	132.13	0.02	-	-	5,333.42	-
NO ₂ Emmision	13,008.52	0.03	237.3	0.04	-	-	13,245.82	-
Fuel Consumption	5,418	0.01	47.43	0.01	-	-	5,465.43	-
Peat Oxidation	0	0	0	0	-	-	0	-
Crop Sequestration	-151,463.46	-0.4	-2,214.92	-0.36	-	-	-153,678.38	-
Conservation Sequestration	-1,544.68	0	-2.48	0	-	-	-1,547.16	-
Total	28,235.07	0.07	588.18	0.1			28,823.25	

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	28,619.83	0.07
Fuel Consumption	752.36	0
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-1,467.69	0
Sales of PKS	-9,120.5	-0.02
Sales of EFB	-10,007.34	-0.03
Total	8,776.67	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	7,964.73
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 (%)	30
Divert to methane captured (flaring) (%)	37
Divert to methane captured (energy generation) (%)	33

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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	IOI Commodity Trading Sdn Bhd (Ladang Sabah Sdn Bhd – Ladang Sabah Palm Oil Mill) takes legal ownership and physically handles its RSPO certified oil palm products.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Ladang Sabah POM is not a trading company and does not have distributor license. Therefore, this requirement is not applicable.	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	RSPO Membership of Ladang Sabah Palm Oil Mill is under IOI Corporation Berhad with RSPO Membership No. 2-0002-04-000-00 since 17 May 2004. Palmtrace Member ID: RSPO_PO1000000541 (Ladang Sabah Sdn Bhd – Ladang Sabah Palm Oil Mill) which license expires on 02/04/2019.	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids was not in used at Ladang Sabah Palm Oil Mill	N/A
5.2 Supply chain model			

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The mill has only received all the certified FFB from its certified estates which belongs to IOI Corporation Berhad. SOP for RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP), Doc. No.: RSPOSC/SOP/IP/3, Rev. 06 dated 8/9/2018 was developed to implement the IP supply chain system at the POM. The procedure is applicable to incoming FFB, outgoing CPO & PK at RSPO certified mills that operate IP supply chain system. The procedure has inclusive of overproduction, handling of complaints and non-conformities product. During the period of January 2018 to December 2018, Ladang Sabah Palm Oil Mill has received and processed FFB from own plantations: 338,356.69 MT with Module D (Identity Preserved) and 6,223.58 MT from other certified units with Module D (Identity Preserved) for supply chain model.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Ladang Sabah Palm Oil Mill was certified with Module D: Identity Preserved Module.	Yes
5.3. Documented Procedures			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none">• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	IOI Plantation Services Sdn Bhd has developed procedures to implement the elements of the applicable supply chain model as below: <ul style="list-style-type: none">a. RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP), Doc. No.: RSPOSC/SOP/IP/3, Rev. 06 dated 8/9/2018b. Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018	Yes
	<ul style="list-style-type: none">• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Seen the records that included in the procedure are as below: <ul style="list-style-type: none">a. Weighbridge ticketsb. Training recordsc. Internal audit reportd. Invoice and contracts	Yes

		<p>e. Delivery and storage records f. Daily Production Report</p> <p>Training records for RSPO Supply Chain (Requirement & Module D: Identity Preserve) was sighted where the training was conducted on 12/1/2019 for the critical control point responsible person such as SPO Clerk, Weighbridge Operators and Security Guards. Besides, training for contractors was conducted on 18/1/2019 for the RSPO Supply Chain Certification Standard. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure. Training materials were sighted.</p>	
	<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	<p>The Mill Manager has an overall responsibility and authority over the implementation of the procedure, requirements and compliances with all the applicable RSPO Supply Chain Certification Standard and assisted by Assistant Managers, Engineers and Technical Executives as per stated in the RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP) procedure.</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>IOI Plantation Services Sdn Bhd has developed Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018 for conducting RSPO SCCS and RSPO Rules on Market Communications and Claims internal audit. The internal audit will be conducted by sustainability team and the frequency of internal audit must be carried out at least once a year. More frequent audits may be conducted for higher risk units.</p>	Yes
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>The last internal audit was carried out on 9/1/2019 by Executive SPO Department Sandakan Region. The coverage of internal audit has inclusive of General Chain of Custody Requirements for the Supply Chain and Module D: Identity Preserved. Total 2 non-conformities have been raised and were adequately closed for the non-conformities through verified the Verification on Major Non-Compliance (NS) against Sustainability Requirement dated 19/1/2019.</p>	Yes

5.4. Purchasing and goods in			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>When FFB delivered to the mill from the estates, the transporters presented the FFB Dispatch Tickets and in some cases, estate's Weighbridge Tickets to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the dispatch tickets is as follows:</p> <ul style="list-style-type: none"> • FFB Dispatch Chit No. – 1664455 • Estate's name – Bimbingan 2 • Division – B2A • Date of delivery – 31/12/2018 • Field No. – 97R & 97P • Total bunches – 709 • Harvesting dates – 31/12/2018 • Seal no. & remarks – 009217 to 009219 • RSPO Certificate No. - RSPO 687135 <p>E.g. of information available in the estate's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Name of estates – Bimbingan 2A • Field No. – 97R, P • Dispatch chit no. – 1664455 • Name of transporter company – Cahaya Ayuni Ent. • Name of driver – Saroni • Vehicle no. – SS371N • RSPO certificate no. – RSPO 687135 • Weighbridge ticket no. – S0009037 • Date of delivery – 31/12/2018 • Seal no. – 009217 to 009219 • Net weight – 20.08 mt 	Yes
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for 	<p>The information was available in various documents as mentioned above.</p>	

	RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).		
	<ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	Validity will be check if there is any diversion from other certified group estate's or mill. Information such as copy of certificate will be kept for reference at mill. The mill does not accept any third party crop.	Yes
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	The FFB sent from any estates outside the certification unit were mainly from its sister IOI mills such as Sakilan and Pamol. The validity of their RSPO certificates are normally monitored centrally from KL HQ, which updates will be communicated internally from time to time.	Yes
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	NA – the mill does not purchase FFB from any certified trader.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Clause 5.4 of the RSPO/SOP/COC/3 – Handling RSPO Products, which reads non-certified or contaminated FFB shall be segregated from certified oil palm products via segregation at mill ramp. In case of contamination with non-conforming products, the certified products shall be downgraded and sold under MB module.	Yes
5.5. Outsourcing activities			
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall	Not applicable. No outsourcing activity.	N/A

	<p>ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>		
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	Not applicable. No outsourcing activity.	N/A
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	Not applicable. No outsourcing activity.	N/A
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	Not applicable. No outsourcing activity.	N/A
	<p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems,</p>	Not applicable. No outsourcing activity.	N/A

	and any and all information, when this is announced in advance.		
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.6. Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	So far the CPO and PK are delivered to IOI Edible Oil (refinery) in Sandakan only and only one mode of transportation i.e. via bulking tank. Verification of sampled dispatch confirm that all the required information was available in the delivery documents.	Yes
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	The information was available in various documents such as weighbridge ticket and delivery order.	Yes

	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	Shipping announcements were made in the RSPO Palmtrace when the CPO or PK were delivered from IOI Edible Oil. Summary of the announcement which was extracted from RSPO Palmtrace system was made available for verification.	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly. Since the last assessment there were 33 announcement made.	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 	Based on the announcement summary, all the registrations were found to be in order.	Yes
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	Not applicable. Products are not sold beyond refinery.	Yes

	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	Based on the mill's products movement records, it was confirmed that the products quantity which were sold under different schemes or conventional were correctly deducted from its supply chain account and no double claim was detected.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Based on the announcement summary, all the confirmations were found to be in order.	
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Ladang Sabah POM has developed Training Program for the Year 2019 to arrange for the trainings to be conducted throughout the year. Training records for internal employees and contractors were sighted.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Training records for RSPO Supply Chain (Requirement & Module D: Identity Preserve) was sighted where the training was conducted on 12/1/2019 for the critical control point responsible person such as SPO Clerk, Weighbridge Operators and Security Guards. Besides, training for contractors was conducted on 18/1/2019 for the RSPO Supply Chain Certification Standard. Seen the attendance list and training materials were sighted. Interviewed with the weighbridge operators and transporter representative found that they are aware of the company and RSPO Supply Chain procedure.	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Ladang Sabah POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As per the RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 2 years' period. Sampled of records of FFB weighbridge tickets and daily	Yes

		production records for last 2 years were sighted to maintain and keep at the office.	
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Not applicable as the product of the facility is containing 100% palm oil.	N/A
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has obtained Trademark License from RSPO and seen the trademark license# 2-0002-04-100-03 which valid from 19/12/2017 to 18/12/2019.	Yes
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its	IOI Group has highlighted that they are the founding member of RSPO and played an active role to promote sustainable practice in the group	Yes

	commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	website, https://www.ioigroup.com/Content/S/S_Systems . This is an "off-product" claim that has been made in the website.	
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	The IOI group has declared that they are members of RSPO and promote the sustainable practice throughout the company since 2004. There was no RSPO Trademark has been used verify through the website, notice board, business card, shipping documentation and procurement/ purchasing document.	Yes
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The company does not make any statement that may misleading to the consumers to believe that RSPO membership by itself implies that selling of RSPO-certified oil palm products by verified through the website.	Yes
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	The communication that made via website is consistent, clear and does not mislead the consumer and stakeholders as to the certified content of oil palm products in their own products.	Yes
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.	There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.	Yes
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. No claims have been made.	Yes

	organizations in the supply chain about the use of certified sustainable oil palm products.		
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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO with RSPO certificate number: RSPO 687135. Refer to weighbridge ticket # 111824 dated 1/10/2018. No claims have been made.	Yes
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Ladang Sabah POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	N/A
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification. For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided	Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.	N/A

	by a certified RSPO member without constituting a product-specific claim.		
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made by Sakilan POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made by Sakilan POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Sakilan POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Sakilan POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Sakilan POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made by Sakilan POM and only produce crude and unfinished product. This is not applicable for POM.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made by Sakilan POM and only produce crude and unfinished product. This is not applicable for POM.	N/A

6.8	<p>RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>	<p>No business to consumer communication on product specific claim made by Sakilan POM and only produce crude and unfinished product. This is not applicable for POM.</p>	N/A
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product.</p>	N/A
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product.</p>	N/A
	<p>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,</p>	<p>Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product.</p>	N/A

	the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.		
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product.	N/A
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 	Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product.	N/A

	<ul style="list-style-type: none"> References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
MODULE C – PARTIAL PRODUCT CLAIMS			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 	<p>Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>N/A</p>
MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p>	<p>Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>N/A</p>

	75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made		
	Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made: 95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made	Ladang Sabah POM is producing crude palm product and does not involved in any labelling of end product.	N/A
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The company has established RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP) Procedure, Doc. No.: RSPOSC/SOP/IP/3, Rev. 06 dated 8/9/2018 where the procedure to handle complaints has outlined in the procedure. All the internal and external feedback (customer/ supplier complaints) shall be handled according to the Group Procedure which can access through IOI website (https://www.ioigroup.com/content/S/S_Grievance). The complaint will be discussed during the management review meeting. There were total 6 complaints received from January 2018 to December 2018. The complaints were involved "High FFA". Investigations have been carried out and responded to the customer. All the complaints have been solved.	Yes
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	As per the Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 14/12/2018 where the management review meeting will be scheduled once a year after internal audit has been carried to discuss the internal audit result.	Yes

5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>The last management review meeting was carried out on 14/1/2019 where the input of the management review has included customer feedback, results of internal audit, status of preventive and corrective actions, recommendation for improvement, review meeting on previous meeting minutes.</p>	<p>Yes</p>
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>All the outputs of the management review meeting have been discussed and not limited to improvement of effectiveness of management system and resource needs.</p>	<p>Yes</p>

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

D.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	FFB were obtained from all IOI's certified estates only. There was no third party's crop nor non-certified FFB received by the mill.	Yes
D.2 Explanation			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Yes
D.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	During the assessment, inspection of the palm trace records was done and found all the transaction including shipping announcement have been registered. Following transaction ID sampled: <ul style="list-style-type: none"> • TR-610793cf-f5a9 	Yes

		• TR-e137d433-0324	
D.3 Documented procedures			
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	Cross refer to Indicator 5.3 of Appendix D.	Yes
	b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site’s procedures for the implementation of this standard.	Cross refer to Indicator 5.3 of Appendix D.	Yes
D.3.2	The site shall have documented procedures for receiving and processing certified FFBs.	Since the mill is only accepting certified FFB, the procedures for receiving and processing FFB are the same as mention in Indicator 4.1.1.	Yes
D.4 Purchasing and goods in			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBs received.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Ladang Sabah mill have system to verify at the weighbridge.	Yes
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Ladang Sabah POM is aware of this requirement and no projected overproduction for the period under review.	Yes
D.5 Record keeping			
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Real-time basis recorded in “Real-time Mass Balance Table Calculation” for both CPO and PK. Information available in the format is date, FFB processed, OER, CPO amount [opening,	Yes

	<p><i>IP Mill must report on real time basis.</i></p>	<p>produced and closing] and transferred CPO [mill weight, refinery weight]</p> <p><u>CPO:</u> RSPO certified FFB carried forward from Dec18 = 0 mt RSPO certified CPO carried forward from Dec18 = 2,099.18 mt RSPO certified FFB processed as at 23/1/2019 = 25,554.30 mt RSPO certified CPO produced as at 23/1/2019 = 4,888.19 mt RSPO certified CPO sold as certified (RSPO & ISCC) as at 23/1/2019 = 3,486.12 mt (buyer's weight) & 3,482.22 mt (mill's weight)</p> <p>Balance of RSPO certified CPO = 3,505.15 mt</p> <p><u>PK:</u> RSPO certified FFB carried forward from Dec18 = 0 mt RSPO certified CPO carried forward from Dec18 = 263.67 mt RSPO certified FFB processed as at 23/1/2019 = 25,554.30 mt RSPO certified CPO produced as at 23/1/2019 = 1,417.39 mt RSPO certified CPO sold as certified (RSPO & ISCC) as at 23/1/2019 = 1,327.35 mt (buyer's weight) & 1,326.00 mt (mill's weight)</p> <p>Balance of RSPO certified CPO = 355.06 mt</p> <p>The movements are also reflected in the mill's "Daily Production Report"</p>	
<p>D.6 Processing</p>			
<p>D.6.1</p>	<p>The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated</p>	<p>During this assessment it was confirmed that only own supply bases of FFB is processed and no receive of outsider crops. This ensures that there is no possibility of mixing during processing.</p>	<p>Yes</p>

	from non- certified oil palm product including during transport and storage to strive for 100% separation.		
D.6.2	The objective is for 100 % segregated material to be reached.	Since there is no process of non-certified FFB, the objective for 100% segregated material is reachable.	

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (January 2018 – December 2018)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	January 2018	35,690.20	0	35,690.20
2	February 2018	36,425.07	0	36,425.07
3	March 2018	34,925.92	0	34,925.92
4	April 2018	34,372.08	0	34,372.08
5	May 2018	31,167.85	0	31,167.85
6	June 2018	26,794.61	0	26,794.61
7	July 2018	24,531.11	0	24,531.11
8	August 2018	19,062.53	0	19,062.53
9	September 2018	17,176.98	0	17,176.98
10	October 2018	23,026.34	0	23,026.34
11	November 2018	27,869.96	0	27,869.96
12	December 2018	33,537.62	0	33,537.62
	Total	344,580.27	0	344,580.27

B. Monthly Records of Certified CPO & PK since the last audit (January 2018 – December 2018)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	January 2018	6,872.32	1,984.95
2	February 2018	7,487.57	1,873.21
3	March 2018	7,040.50	1,895.51
4	April 2018	7,140.16	1,923.99
5	May 2018	6,510.08	1,739.65
6	June 2018	5,528.33	1,389.55
7	July 2018	5,231.53	1,310.26
8	August 2018	4,007.06	1,072.33
9	September 2018	3,293.63	883.57
10	October 2018	4,745.94	1,297.71
11	November 2018	5,668.95	1,423.61
12	December 2018	6,669.28	1,865.95
	Total	70,195.35	18,660.29

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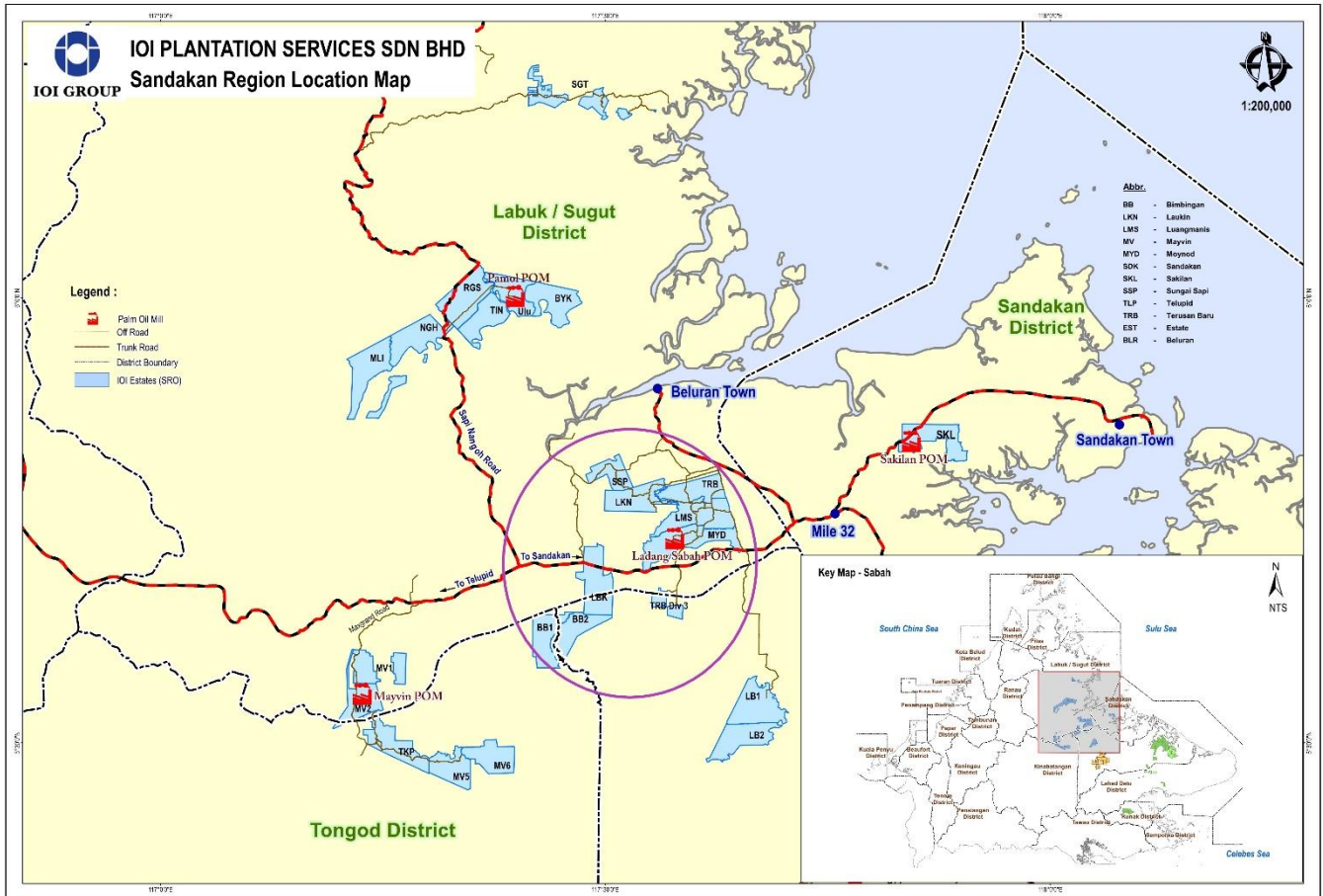
C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) <i>(January 2018 – December 2018)</i>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	IOI Commodity Trading Sdn Bhd	CB65175	55,181.28	17,328.64
Total			55,181.28	17,328.64

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) <i>(January 2018 – December 2018)</i>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1.	XXX	ISCC	3,999.66	-
Total			3,999.66	

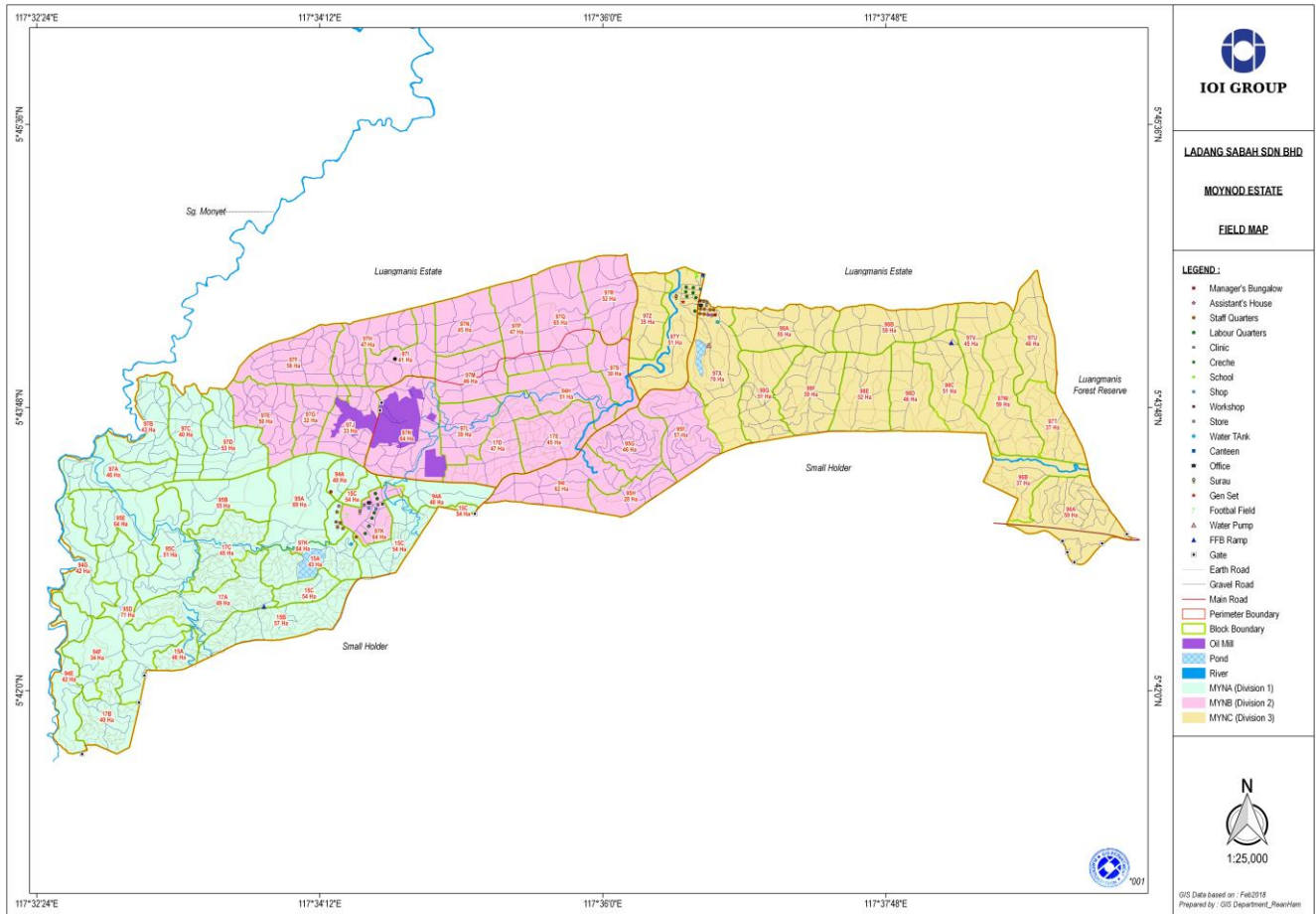
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) <i>(January 2018 – December 2018)</i>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	YYY	4,087.52	-	
Total		4,087.52	-	

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) <i>(January 2018 – December 2018)</i>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1		N/A	

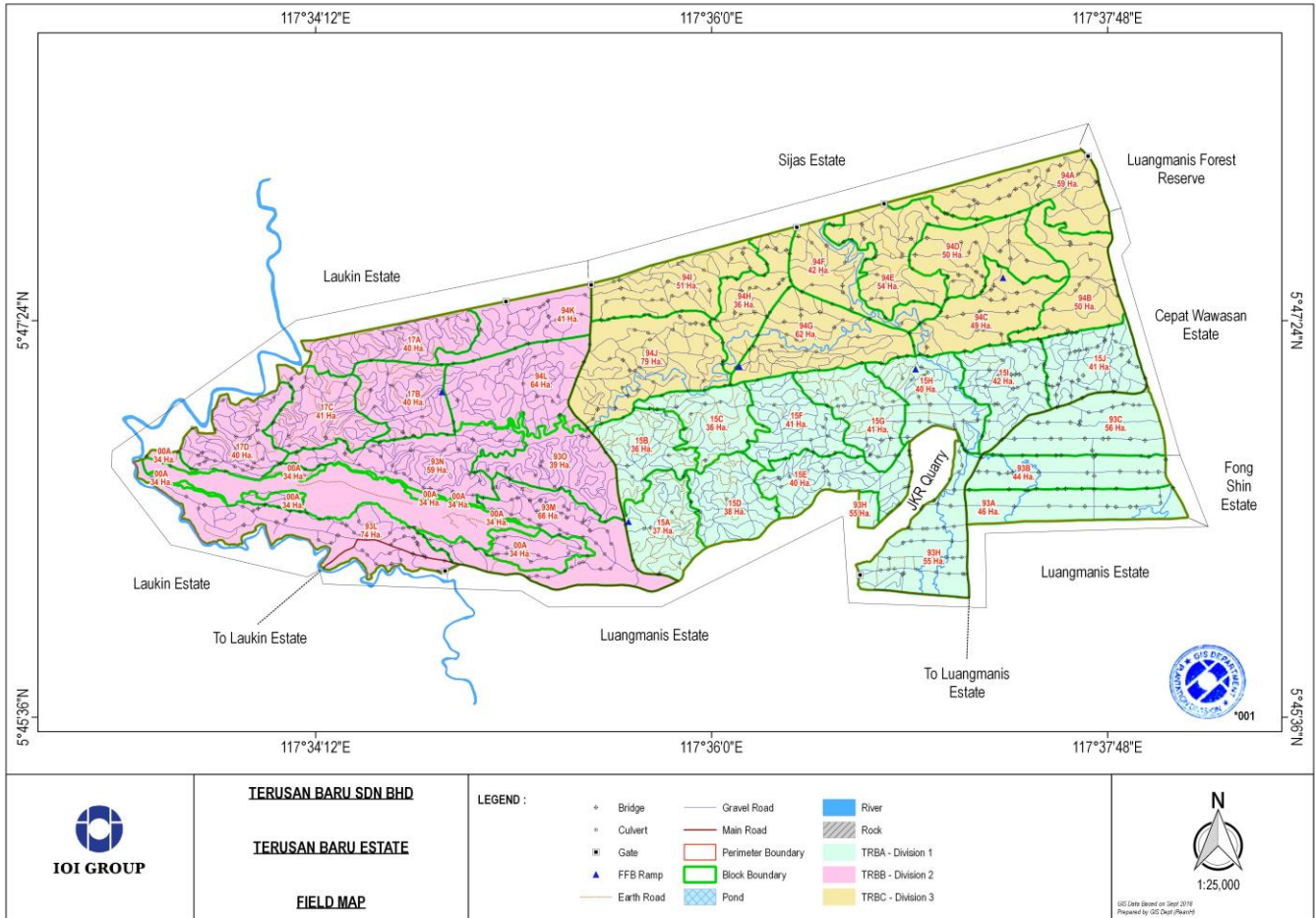
Appendix F: Location Map of Ladang Sabah Palm Oil Mill Certification Unit and Supply bases



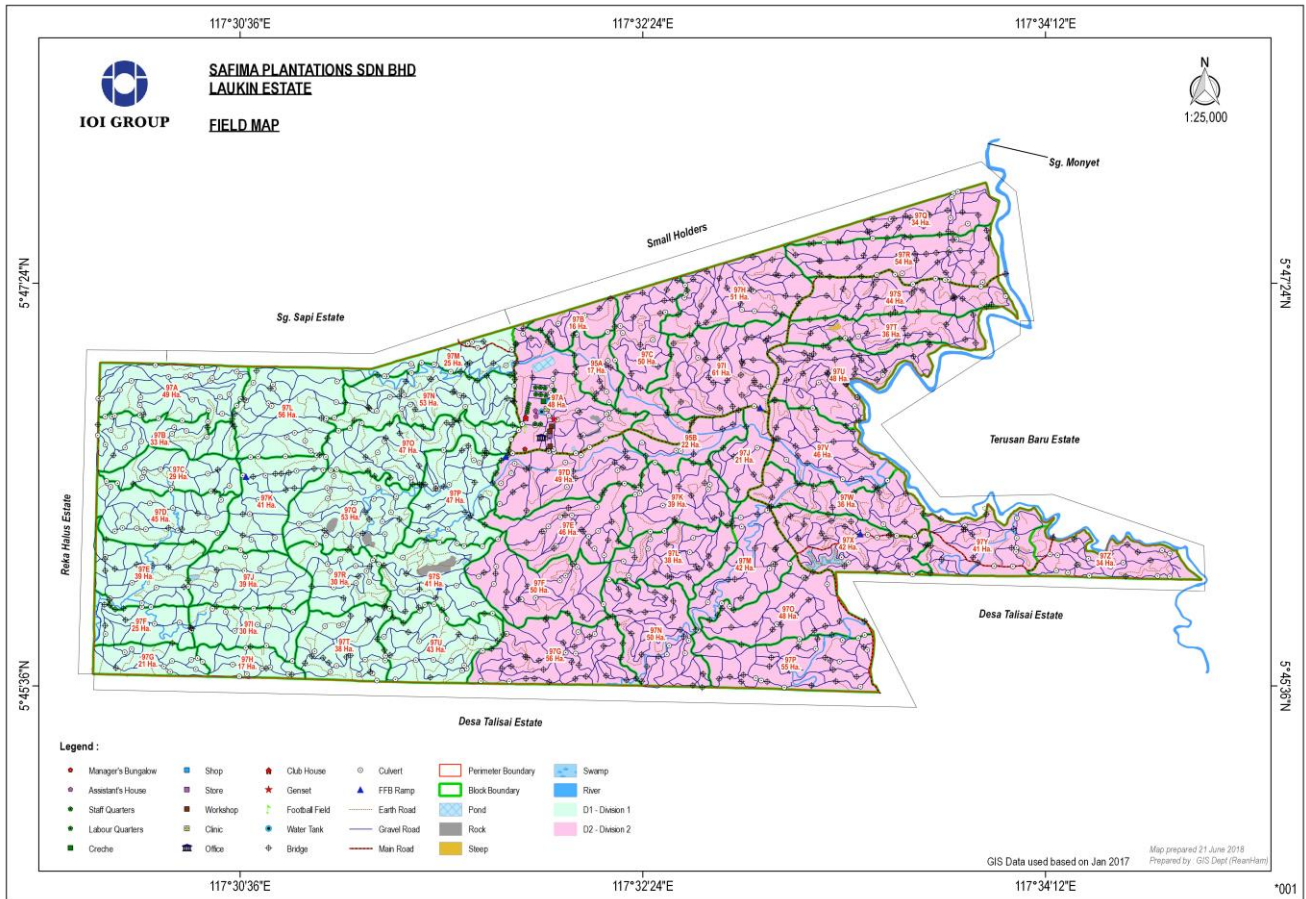
Appendix G: Moynod Estate Field Map



Appendix H: Terusan Baru Estate Field Map



Appendix I: Laukin Estate Field map



Appendix J: List of Smallholder Sampled *(If applicable – scheme/associated/group certification)*

Not applicable

DRAFT

Appendix K: 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
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure