

**MALAYSIAN SUSTAINABLE PALM OIL – INITIAL
ASSESSMENT
Public Summary Report**

IOI Corporation Berhad
Client company Address: IOI Plantation Services Sdn Bhd Level 8, Two IOI Square, IOI Resort 62502 Putrajaya, Malaysia
Certification Unit: Pamol Kluang Palm Oil Mill & estates Location of Certification Unit: 8 1/2 Miles, Jalan Mersing Road, 86007 Kluang, Johor Darul Takzim, Malaysia.

Report prepared by:
Elzy Ovktafia (Lead Auditor)

Report Number: 8938606

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Pamol Kluang POM: 500040104000 Pamol Timur Estate: 504178602000 Pamol Barat Estate: 504177802000 Mamor Estate: 511691002000 Unijaya Estate: 504524202000 Kahang Estate: 502165302000 Swee Lam Estate: 502470902000		
Company Name	Pamol Kluang Palm Oil Mill		
Address	8 1/2 Miles, Jalan Mersing Road, 86007 Kluang, Johor Darul Takzim, Malaysia		
Group name if applicable:	IOI Corporation Berhad – IOI Plantation Services Sdn Bhd		
Subsidiary of (if applicable)	Pamol Plantations Sdn Bhd		
Contact Person Name	Mr Mohd Saidani bin Dandan Satia		
Website	www.ioigroup.com	E-mail	pmm@ioigroup.com
Telephone	+603-89478888 +607-787 5171	Facsimile	03-8947 8888

1.2 Certification Information			
Certificate Number	Pamol Kluang Palm Oil Mill : MSP0 700801 Pamol Kluang Estates : MSP0 700802		
Issue Date	31/12/2018	Expiry date	30/12/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	N/A		
Stage 2 / Initial Assessment Visit Date (IAV)	26-29/11/2018		
Continuous Assessment Visit Date (CAV) 1	-		
Continuous Assessment Visit Date (CAV) 2	-		
Continuous Assessment Visit Date (CAV) 3	-		
Continuous Assessment Visit Date (CAV) 4	-		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 547027	RSPO P&C MYNI 2014	BSI Services Malaysia Sdn Bhd	15/03/2020

1.3 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Pamol Kluang Palm Oil Mill	Pamol Kluang Oil Mill, Jalan Kluang – Mersing, 86000 Kluang, Johor	2° 6' 39.49"	103° 23' 32.25"
Pamol Timur Estate	Pamol Timur Estate, Jalan Kluang – Mersing, 86000 Kluang, Johor Kluang, Johor	2° 6' 43.01"	103° 23' 08.3"
Pamol Barat Estate	Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	2° 6' 46.9"	103° 20' 38.0"
Mamor Estate	Mamor Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	2° 8' 43.1"	103° 18' 21.5"
Unijaya Estate	Unijaya Estate, Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 8609 Kluang, Johor.	1° 56' 26.1"	103° 16' 41.5"
Kahang Estate	Kahang Estate, Peti Surat 14, 86700 Kahang, Johor.	2° 19' 55.73"	103° 29' 51.83"
Swee Lam Estate	Swee Lam Estate, K.B.107, 81000 Kulai, Johor	1° 40' 29.0"	103° 39' 13.6"

1.4 Plantings & Cycle					
Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Pamol Timur Estate	412	1239	442	0	0
Pamol Barat Estate	845	874	0	0	436
Mamor Estate	0	201	1521	352	0
Unijaya Estate	307	339	274	252	0
Kahang Estate	0	364	1914	0	0
Swee Lam Estate	0	500	599	0	1
Total (ha)	1,564	3,517	4,750	604	437

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1.5 FFB Production (Actual) and Projected (tonnage)			
Producer Group	Projected from last audit	Actual (December 2017- October 2018)	Forecast (December 2017- November 2019)
Pamol Timur Estate	N/A. This is initial assessment.	35,065.21	33,600
Pamol Barat Estate		24,527.91	26,875
Mamor Estate		45,546.13	62,687
Unijaya Estate		23,403.41	29,850
Kahang Estate		47,198.76	72,640
Swee Lam Estate		27,461.87	26,280
Total			203,203.29

1.6 Certified CPO / PK Tonnage			
Mill	Estimated (Previous Year)	Actual (December 2017- October 2018)	Forecast (December 2017- November 2019)
Pamol Kluang Palm Oil Mill 60 MT/hr	FFB	FFB	FFB
	N/A. This is initial assessment.	203,203.29	251932.00
	CPO (OER: %)	CPO (OER: 23.79 %)	CPO (OER: 23.5 %)
	N/A. This is initial assessment.	48,342.06	59,204.02
	PK (KER: %)	PK (KER: 5.03 %)	PK (KER: 5.00 %)
	N/A. This is initial assessment.	10,221.13	12596.60

1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pamol Timur Estate	2,093	1.05	203.87	2,297.92	91.08 %
Pamol Barat Estate	2,155	2.25	157.08	2,314.33	93.12 %
Mamor Estate	2,074	41.33	110.15	2,225.48	93.19 %
Unijaya Estate	1,172	1.73	86.77	1,260.50	92.98 %
Kahang Estate	2,278	5.57	136.33	2,419.90	94.14 %
Swee Lam Estate	1,100	6.08	54.88	1,160.96	94.75 %
Total	10,872	58.01	749.08	11,679.09	93.09 %

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Initial Certification Assessment of IOI Pamol Kluang Palm Oil Mill, located in **Kluang, Johor** comprising **1 mill and 6 estates** and infrastructure

The assessment was conducted onsite to assess the compliance of the certification unit against the **MS 2530-3:2013 MSPO Part 3: General principles for oil palm plantations and organized smallholder** and **MS 2530-4:2013 MSPO Part 4: General principles for palm oil mills**.

The onsite assessment was conducted on **26-29/11/2018**.

Based on the assessment result, **Pamol Kluang Palm Oil Mill and supply bases** complies with the **MS 2530-3:2013 MSPO Part 3: General principles for oil palm plantations and organized smallholder** and **MS 2530-4:2013 MSPO Part 4: General principles for palm oil mills** and recommended for certification.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from **26-29/11/2018**. The audit programme is included as Appendix A. The approach to the audit was to treat the IOI Pamol Kluang Palm Oil Mill & **supply bases** as a MSPO Certification Unit. 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. **MS 2530-3:2013 MSPO Part 3: General principles for oil palm plantations and organized smallholder** and **MS 2530-4:2013 MSPO Part 4: General principles for palm oil mill** 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 estates or smallholders sample were determined based on formula $N = 1.0\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(1.0\sqrt{y}) \times (z)$; where 1.0 is the risk factor (may defer to 1.2 and 1.4 depending on risk), where y is total number of group members and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix C.

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

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

The assessment findings for the initial assessment are detailed in Section 4.2. This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified. This report was externally reviewed by MSPO

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approved Peer Reviewer prior to certification decision by BSI. The comments made by external stakeholders were also taken into account in the assessment where the stakeholder notification was made through BSI website: <https://www.bsigroup.com/en-MY/RSPO-MSPO-Certification/MSPO-clients-and-reports1/>

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

1. Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Pamol Kluang Palm Oil Mill	√	√	√	√	√
Pamol Timur Estate	√		√		√
Pamol Barat Estate	√		√		√
Mamor Estate		√		√	
Unijaya Estate	√		√		√
Kahang Estate		√		√	
Swee Lam Estate		√		√	

Tentative Date of Next Visit: November 26, 2019 – November 29, 2019

Total No. of Mandays: 8 mandays

BSI Assessment Team:

Elzy Ovktafia - Lead Assessor

She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing AISP. She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for almost 3 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates.

Amir Bahari - Team member

He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

There was no NC raised during this assessment.

Noteworthy Positive Comments	
1	Good cooperation among the team.
2	Good document retrieval.

3.3 Status of Nonconformities Previously Identified and OFI

Not applicable. This is initial assessment.

3.4 Issues Raised by Stakeholders

IS #	Description
1	Issues: Smallholders – They felt gratitude to the management as they provided whatever assistance that requested by them. For eg: if their truck breaks down or stuck in the field, the management provided tractor to help the smallholders. Besides, the management also maintained the road that access by them. They have good relationship with the management and no land encroachment issue reported.
	Management Responses: The management will ensure the relationship between the management and smallholders is maintained.
	Audit Team Findings: No other issue.
2	Issues: Workers’ Representatives – They informed that they have been paid as per the Minimum Wage Order 2016 and according to Employment Act 1955. They were paid double rate if worked on rest day. They were treated equally without discrimination and the company did not restrict their movement.
	Management Responses: The management will continue to ensure compliance with the legal requirements.
	Audit Team Findings: No further issue.

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3	Issues: Headmistress of SJKC Kg Gajah – She informed that the company’s management has maintained good relationship with the school management. Donation was given to the school whenever they requested for any activities. However, she reported that there was bad odour from the mill sometimes.
	Management Responses: The management has acknowledged the issue as there was complaints received during the stakeholder meeting. The management is in progress to install the biogas plant and polishing plant to rectify the issue.
	Audit Team Findings: Verified the CAPEX proposed by the management and this project will be on-going until next year. Therefore, this will be verified during next assessment.
4	Issues: Contractors – They informed that they have signed an agreement prior to work and payment was made according to the terms stated in the agreement. They are aware of the complaint procedure as they have been briefed by the management.
	Management Responses: The management will make sure the payment is make promptly.
	Audit Team Findings: Verified the invoices and payment vouchers confirmed that payment was made promptly.
5	Issues: Villager Kg Sri Tambak – He informed that no land dispute reported by the villagers. Trenches and marking were available to demarcate the boundaries. The villagers allow to visit the mosque inside the estate. Job opportunity was provided to local communities as well.
	Management Responses: The management will maintain good relationship with the local communities.
	Audit Team Findings: No other issue.

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
There was no NC raised during this assessment.			

3.6 Summary of the findings by Principles and Criteria

Malaysian Sustainable Palm Oil Part 4: General Principles for Palm Oil Mills.

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	IOI Group has the Sustainable Palm Oil Policy signed by Dato’ Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The policy mentioned that IOI group is committing towards sustainable production of palm oil and its continuous improvement as outlined in the Malaysian Sustainable Palm Oil (MSPO) guidelines.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	SOP on Sustainability, SOP 1.7 issue/rev: 1/1, date 03.05.2018. Frequency for audit is conducted regularly based on non-conformances, complexity and maturity of the processes.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to	The sustainability, safety & health department (peninsular) has conducted the internal audit on 10.10.2018. There were 16 NCs and 6 OFIs raised.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. - Major compliance -		
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report is available during the audit and the outcomes were discussed during the management review on 19.11.2018.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Management review has been conducted on 19.11.2018 at Pamol Club, Meeting Room attended by management team representative (21 people) and sustainability team representative (6 people) includes all business units in Pamol Kluang Complex. The agenda discussed the results of audits, customer feedback, status of preventive and corrective actions, follow-up actions from management reviews, changes that could affect the management system and recommendations for improvement.	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Pamol Kluang POM has the future continuous improvement plan categorized by grievance procedure, facilities/amenities/workers linesite and social contribution/corporate social responsibility (CSR). There are plan to achieve it, target to be completed and person in charge appointed accordingly.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>Pamol Kluang POM has below 5 years business management plan:</p> <ol style="list-style-type: none"> 1. To install boiler emission control system and comply with Ringelmann Chart 1. 2. To install biogas plant and capture the biogas for flaring or other uses 3. To comply with DOE requirement as stated in "Jadual Pematuhan'. 4. To perform conventional desludging at cooling pond 1,2,3. 	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p>- Major compliance -</p>	<p>Management has conducted the annual stakeholder meeting, disseminate the information through website: www.ioigroup.com, establishing the complaint/grievance book for internal complaint and external stakeholder's file.</p> <p>For stakeholder request, the SOP Stakeholder Request Procedure, SOP 1.0, Appendix 4, issue/rev: 1/0 mentioned the flowchart of the request and SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which takes 5 days for action taken by the management.</p>	Complied
4.2.1.2	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The management able to show the documents during the audit, ie: company policies, communication records, minutes of meeting, internal audit reports, etc.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	For stakeholder request, the SOP Stakeholder Request Procedure, SOP 1.0, Appendix 4, issue/rev: 1/0 mentioned the flowchart of the request and SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which takes 5 days for action taken by the management.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	Management has appointed Mr. Fernandez Samy, Assistant Manager as the Social Liaison Officer as per appointment letter dated 10.11.2017. His responsibility covers welfare and social needs of stakeholders, periodic visits to neighbouring stakeholders, maintenance and monitoring of grievance issues and facilitate feedback mechanism, etc.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	The stakeholder list 2018 for Pamol Kluang Palm Oil Mill is available and updated accordingly. The stakeholders comprise of government bodies, non-govt. organization (NGO's), contributing estates/supply base estates, neighbouring villages, suppliers, contractors, transporters, schools, mill management, JCC members and worshipping areas. The latest stakeholder minutes meeting available dated 16.11.2018 (internal) and 29.10.2018 (external). All positive and negative issues captured in the SIA management plan.	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a	IOI group has the SOP title: MSPO Supply Chain – Oil Mill: Segregation (SG), doc. No: MSPOSC/SOP/SG/1, revision: 00 dated 20.10.2018.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	standard operation procedure for traceability. - Major compliance -		
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The traceability of the FFB, PK, CPO and PKO are inspected through the internal audit conducted as per 4.1.2.2	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	As per MSPO Supply Chain – Oil Mill: Segregation (SG), doc. No: MSPOSC/SOP/SG/1, revision: 00 dated 20.10.2018, the mill manager has an overall responsibility and authority over the implementation of the procedure, requirements and compliances with all the applicable MSPO supply chain certification.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Pamol Kluang are using millcomp system and PINFOSYS (Plantation Integrated Management/System) to monitor the daily and monthly incoming FFB and outgoing CPO and PKO. During the site visit, it was evident that the system able to show the traceability for certified FFB and CPO/PKO. However, since MSPO is not yet certified, the traceability demonstration been shown for RSPO supply chain as it will apply the same method in future (certificate number and certified product). Seen the below samples: <ol style="list-style-type: none"> 1. FFB Weighbridge ticket no: 284725 dated 26.11.2018, 9,690 kg and supplier: Pamol Timur. 2. Grading chit: A/C no 01, Supplier: Pamol Timur, date: 26.11.2018. 3. CPO Weighbridge ticket: 81155, dated 24.11.2018 DO no: 38167, net weigh: 44,620 kg 	Complied

Criterion / Indicator	Assessment Findings	Compliance																									
4.3 Principle 3: Compliance to legal requirements																											
Criterion 4.3.1 – Regulatory requirements																											
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>In Pamol Kluang POM, it was found that Employee Id: PMM0195, PMM0123 and PMM0176 has the salary deduction of electricity and water bills without the salary deduction permit from the Labour Department, however, auditor has further discussison with the Labour Department Officer through phone call confirmed that the application is in the process and pending for the Director General signature, hence this already been rectified by the mill earlier.</p> <p>The Mill continued to comply with legal requirements as per the indicator. Compliance to each applicable law and regulation is monitored by the Operating Units and Sustainability team. The CU had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were:</p> <table border="1" data-bbox="1095 1029 1834 1399"> <thead> <tr> <th>No</th> <th>License / Permit / Regulatory Requirement</th> <th>Validity Period/Ref</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB license no 5000-4010-4000</td> <td>31/3/18-31/3/19</td> </tr> <tr> <td>2</td> <td>DOE license 004723.</td> <td>30/6/18-30/6/19.</td> </tr> <tr> <td>3</td> <td><i>Jadual Pematuhan</i> ref No. 31/152/000/048</td> <td>30/6/18-30/6/19.</td> </tr> <tr> <td>4</td> <td>Palm Oil crane no 1 PMA 82843</td> <td>30/4/18</td> </tr> <tr> <td>5</td> <td>Boiler No 1 PMD 4520</td> <td>30/4/19</td> </tr> <tr> <td>6</td> <td>Air receiver PMT 47946</td> <td>30/4/19</td> </tr> <tr> <td>7</td> <td>Air receiver PMT 4415</td> <td>30/4/19</td> </tr> </tbody> </table>	No	License / Permit / Regulatory Requirement	Validity Period/Ref	1	MPOB license no 5000-4010-4000	31/3/18-31/3/19	2	DOE license 004723.	30/6/18-30/6/19.	3	<i>Jadual Pematuhan</i> ref No. 31/152/000/048	30/6/18-30/6/19.	4	Palm Oil crane no 1 PMA 82843	30/4/18	5	Boiler No 1 PMD 4520	30/4/19	6	Air receiver PMT 47946	30/4/19	7	Air receiver PMT 4415	30/4/19	<p>Complied</p>
No	License / Permit / Regulatory Requirement	Validity Period/Ref																									
1	MPOB license no 5000-4010-4000	31/3/18-31/3/19																									
2	DOE license 004723.	30/6/18-30/6/19.																									
3	<i>Jadual Pematuhan</i> ref No. 31/152/000/048	30/6/18-30/6/19.																									
4	Palm Oil crane no 1 PMA 82843	30/4/18																									
5	Boiler No 1 PMD 4520	30/4/19																									
6	Air receiver PMT 47946	30/4/19																									
7	Air receiver PMT 4415	30/4/19																									

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Criterion / Indicator		Assessment Findings			Compliance
		8	Vacuum drier PMT 156192	30/4/19	
		9	Steriliser no 1 PMT107343	30/4/19	
		10	Steriliser no 2 PMT118834	30/4/19	
		11	Steriliser no 3 PMT4395	30/4/19	
		12	Steriliser no 4 PMT47885	30/4/19	
		13	Chain hoist no 1 PMA 107140	30/4/19	
		<p>Note: Under MPOB license the approved FFB processed/annum is maximum 288,000 mt for period of 01/4/17-31/3/18 and the actual FFB processed in 2017 was 263,232.53 mt concluding compliance to the regulations. The mill was designed at 60 mt/hr. DOE license 004723 30/6/18-30/6/19 with the <i>Jadual Pematuhan</i> ref AS(B) J 31/152/000/048 among others had the following requirement.</p> <ul style="list-style-type: none"> a) Land discharge 30% water discharge 70%. b) EFB distribution for month of Oct 18 sighted. 			

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Criterion / Indicator		Assessment Findings	Compliance																										
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The Legal Requirement Register was established to cover all legal Acts, Regulations and other requirement related to the POM and supply base.</p> <p>The Legal Requirements Register which was reviewed on 02/05/2017 comprises of the following among others;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Laws/Regulations</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OSHA 1994</td> </tr> <tr> <td>2</td> <td>Factories and machinery Act 1967</td> </tr> <tr> <td>3</td> <td>Code of practice for Safe working in a confined space 2001</td> </tr> <tr> <td>4</td> <td>Environmental Quality Act 1974</td> </tr> <tr> <td>5</td> <td>Minimum wages order 2016</td> </tr> <tr> <td>6</td> <td>Personal Data Protection Act 2010</td> </tr> <tr> <td>7</td> <td>Employment Act 1955</td> </tr> <tr> <td>8</td> <td>EPF 1991</td> </tr> <tr> <td>9</td> <td>Protection of wild life 1972</td> </tr> <tr> <td>10</td> <td>Children and Young Person Act 1966</td> </tr> <tr> <td>11</td> <td>Electrical Supply Act 1990</td> </tr> <tr> <td>12</td> <td>Fire Services Act 1984</td> </tr> </tbody> </table>	No	Laws/Regulations	1	OSHA 1994	2	Factories and machinery Act 1967	3	Code of practice for Safe working in a confined space 2001	4	Environmental Quality Act 1974	5	Minimum wages order 2016	6	Personal Data Protection Act 2010	7	Employment Act 1955	8	EPF 1991	9	Protection of wild life 1972	10	Children and Young Person Act 1966	11	Electrical Supply Act 1990	12	Fire Services Act 1984	Complied
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12	Fire Services Act 1984																												
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The mechanism used for tracking changes in laws/regulations is made through the following methods;</p> <ul style="list-style-type: none"> a) Subscribed to Lexis-Nexis Malaysia b) News release through daily newspaper. c) Law change tracked by book publisher (MDC Book Publications). d) Circulars from relevant association (eg. MPOA, MPOB, MAPA). 	Complied																										

Criterion / Indicator		Assessment Findings	Compliance
		<p>e) Internet (e-federal gazette, www.lawnet.com.my, www.e-warta.com.my)</p> <p>The IOI Legal Department from headquarters alerts all operating units on legal updates via email and also through management meetings.</p>	
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>An Assistant Manager is assigned as a legal liaison officer via an appointment letter dated 10/5/18. The letter was sighted and verified.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.</p>	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p>- Major compliance -</p>	<p>Land ownership such as land title and land lease documents is available. There is no changes in the land ownership since the last audit. All the land belongs to IOI. Both the mill and estates operate on a land of legal ownership having details of follows:</p> <p>a) Pamol Kluang Mill No <i>hak milik</i> 88881. <i>Cukai tahunan</i> RM 200. No Lot: 2429 Luas lot; 4.0974 ha agriculture No plan: 15085</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>No fail; CLM 722/1928.</p> <p>b) Pamol Timur Estate PTD89116 (36.094Ha), Lot 1877 (2050.1393 Ha-7.31Ha</p> <p>c) Pamol Barat Estate MLO3949 (23.067ha), MLO3950 (79.2779Ha), 2589 (859.957ha-2036ha. Lot 2430 (808.1572ha-160.18ha.</p>	
4.3.2.3	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	The mill is located in the sister estate i.e. Pamol Timur Estate and separated by means of fencing to demarcate the separation of management.	Complied
4.3.2.4	<p>Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p>- Minor compliance -</p>	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder's meeting and land titles record.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p>	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder's meeting and land titles record.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record. However, management has the SOP for FPIC, SOP 2.0 & 6.0 Appendix 3, Issue/Revision: 1/0, dated 17.01.2017 and Land Use Compensation Procedure, SOP: 2.0 & 6.0 Appendix 5, Issue/Revision: 1/0 dated 17.01.2017.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Pamol Kluang POM has the Social Impact Assessment, management action plans and continuous improvement plans 2015-2021 prepared by sustainability team and approved by Senior Asst. Mill Manager in charge on 12.11.2015.	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	IOI group has the SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which takes 5 days for action taken by the management and Whistleblowing Policy revised November 2017 to provide a transparent and confidential process for dealing with concerns.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	As per policy, the complaint/grievances lodged been solved within the timeframe.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Management has keep the complaint/grievance record for internal and external stakeholders. Apart from this, the external stakeholder shared their concerns and complaints through stakeholder’s meeting. Sighted the complaint form titled ‘breakdown report’ used by the workers for the issues raised.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	This has been communicated through the stakeholders meeting and complaint/grievance book.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Complaint records are available since 2007 in the complaint/grievance book.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community	Among the contributions made are: 1. Donation to SJKC, Kg Gajah Kluang on September 2018. 2. Donation to SK Ladang Pamol on February 2018 (RM 250.00) 3. Donation to SK Ladang Pamol on November 2018 (RM 300.00).	Complied

Criterion / Indicator		Assessment Findings	Compliance
	development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -		
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	An Occupational Safety, Health And Hygiene Policy has been established dated 03/3/18 and signed by the Plantation Director. Among others the organization expressed commitment to the following; <ul style="list-style-type: none"> i) Complying to all national laws and regulations. ii) Assessing all health and safety risks to work activities iii) Conducting regular inspection at workers houses. iv) Investigating and finding causes of accidents and take appropriate measures to prevent recurrence of such incidents. v) Preparing emergency procedures for major accidents/incidents. 	Complied
4.4.4.2	The occupational safety and health plan should cover the following: <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; 	The Objectives of Safety And Health 2018 among others include the following; <ul style="list-style-type: none"> i) Reduce rate of accidents and others by 10%. ii) Allocate min 0.2% of total man-hours to conduct safety and health related activities. iii) Workers assigned to machines shall be provided with Safe Operating Procedures before work commencement. Investigation made to determine root causes and immediate corrective measures for all accidents resulting in more than 4 MC. 	Complied

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<ul style="list-style-type: none"> ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. 	<p>HIRARC for the mill was formalized in 2008 with the latest review made on 15/9/18. The significant and routine activities were adequately covered with details as follows;</p> <table border="1" data-bbox="1059 571 1848 874"> <thead> <tr> <th>No</th> <th>Areas/Activities</th> <th>No</th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>General /Visitor</td> <td>7</td> <td>Engine Room</td> </tr> <tr> <td>2</td> <td>Contractor servicing</td> <td>8</td> <td>Product storage /Despatch</td> </tr> <tr> <td>3</td> <td>Sterilizer</td> <td>9</td> <td>Laboratory</td> </tr> <tr> <td>4</td> <td>Threshing</td> <td>10</td> <td>Water treatment</td> </tr> <tr> <td>5</td> <td>Clarification / Oil Room</td> <td>11</td> <td>Effluent Treatment Pond</td> </tr> <tr> <td>6</td> <td>Boiler House</td> <td>12</td> <td>SW store</td> </tr> </tbody> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estates office and workshop. In general, the control measures were appropriate to the identified risks.</p> <p>The mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually for all the employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire & PPE. Acknowledgement of receipt was recorded.</p>	No	Areas/Activities	No	Areas /Activities	1	General /Visitor	7	Engine Room	2	Contractor servicing	8	Product storage /Despatch	3	Sterilizer	9	Laboratory	4	Threshing	10	Water treatment	5	Clarification / Oil Room	11	Effluent Treatment Pond	6	Boiler House	12	SW store	
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Criterion / Indicator	Assessment Findings	Compliance												
<p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>The SOP for chemical handling elaborated in <i>SOP Bab 17 issue no 2</i> dated 1/8/18. Therein the procedure containing the following;</p> <ul style="list-style-type: none"> a) A trained person to handle chemicals b) PPE adherence during such an activities c) Handlings details before and after are provided. d) Establishment of emergency situation procedures. <p>The Mill Manager appoints An Assistant Manager as the person in charge for safety and environment through a letter dated 10/11/17 role of which includes areas on safety & health of the staff/workers. The Mill Manager in turn is appointed as the Chairman for the ESH committee duties among other to preside the ESH meetings. The appointment letter dated 10/11/17 signed by the Plantations Director was sighted and verified.</p> <p>The Manager subsequently assigned duties of ESH coordinator to the Assistants/Supervisors for the down line implementation of ESH practices in the mill. The Mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below.</p> <table border="1" data-bbox="1059 1157 1617 1257"> <thead> <tr> <th colspan="4">Pamol Kluang Mill</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>12/10/18</td> <td>3</td> <td>12/4/18</td> </tr> <tr> <td>2</td> <td>13/7/18</td> <td>4</td> <td>11/1/18</td> </tr> </tbody> </table> <p>The minutes of meeting dated 12/10/18 and 12/4/18 respectively were sighted and verified. Workers during the meeting participated in</p>	Pamol Kluang Mill				1	12/10/18	3	12/4/18	2	13/7/18	4	11/1/18	
Pamol Kluang Mill														
1	12/10/18	3	12/4/18											
2	13/7/18	4	11/1/18											

Criterion / Indicator	Assessment Findings	Compliance														
	<p>the discussion mainly on housing and safety. The agenda as discussed during the meeting among others includes the following;</p> <ul style="list-style-type: none"> a) <i>Laporan Pemakaian PPE</i> b) <i>Laporan Prestasi ESH/Kesehatan</i> c) <i>Laporan LatIhan & SOP/HIRARC</i> d) <i>Laporan Pematuhan Undang-Undang</i> e) <i>Laporan Kemalangan</i> f) <i>Laporan Pemeriksaan Tempat Kerja</i> <p>The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the mill. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein.</p> <table border="1" data-bbox="1238 994 1693 1230"> <thead> <tr> <th>No</th> <th>Emergency Response Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Physical injury</td> </tr> <tr> <td>2</td> <td>Chemical spillage,</td> </tr> <tr> <td>3</td> <td>Shovel, tractor, driving</td> </tr> <tr> <td>4</td> <td>Fire outbreak</td> </tr> <tr> <td>5</td> <td>CPO, lubricant spillage</td> </tr> <tr> <td>6</td> <td>Scheduled waste spillage</td> </tr> </tbody> </table> <p>ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified</p>	No	Emergency Response Plan	1	Physical injury	2	Chemical spillage,	3	Shovel, tractor, driving	4	Fire outbreak	5	CPO, lubricant spillage	6	Scheduled waste spillage	
No	Emergency Response Plan															
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Criterion / Indicator	Assessment Findings	Compliance																																			
	<p>organisation who can demonstrate their suitability to provide training. Among others the training held are as follows;</p> <table border="1" data-bbox="1115 539 1816 778"> <thead> <tr> <th>No</th> <th>Emergency Response Plan</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Physical injury</td> <td>5/11/18 & 25/4/18</td> </tr> <tr> <td>2</td> <td>Chemical spillage,</td> <td>22/11/18</td> </tr> <tr> <td>3</td> <td>Shovel, tractor, driving</td> <td>9/11/18</td> </tr> <tr> <td>4</td> <td>Fire outbreak</td> <td>25/4/18</td> </tr> <tr> <td>5</td> <td>CPO, lubricant spillage</td> <td>Scheduled in Dec 18</td> </tr> <tr> <td>6</td> <td>Scheduled waste spillage</td> <td>20/9/18</td> </tr> </tbody> </table> <p>The trained personnel for the First Aid were among the employees working in the mill on shift. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc.</p> <p>Records of accidents are maintained and summarized in JKKP 8. The accidents incidence in 2017 recorded in the mill as shown below:</p> <table border="1" data-bbox="1059 1070 1816 1171"> <thead> <tr> <th rowspan="2">No</th> <th colspan="4">Accidents</th> </tr> <tr> <th>No of cases</th> <th>LTI</th> <th>No of cases</th> <th>Without LTI</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2</td> <td>9</td> <td>27</td> <td>-</td> </tr> </tbody> </table> <p>The total no of accidents cases is 29. All cases of more than 4 days are investigated and root cause being identified. The committee reviewed the HIRARC and change if necessary.</p>	No	Emergency Response Plan	Training	1	Physical injury	5/11/18 & 25/4/18	2	Chemical spillage,	22/11/18	3	Shovel, tractor, driving	9/11/18	4	Fire outbreak	25/4/18	5	CPO, lubricant spillage	Scheduled in Dec 18	6	Scheduled waste spillage	20/9/18	No	Accidents				No of cases	LTI	No of cases	Without LTI	1	2	9	27	-	
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<p>Criterion 4.4.5: Employment conditions</p>																																					

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato’ Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p> <p>Under Human Rights and Workplace, management will respect and uphold the rights of all workers, including contract, temporary and migrant workers, in accordance with the Universal Declaration of Human Rights, the International Labor Organization’s core conventions, United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labor in Palm Oil Production.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato’ Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p> <p>Under Human rights and Workplace, management will provide fair and equal employment opportunities for all employees, regardless of race, nationality, religion or gender.</p> <p>Based on the site visit, there is no discrimination occur within foreign workers and locals as well for the job given.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>There is 90 workers in Pamol Kluang POM (locals: 44, Indonesian: 9, Indian: 9 and Myanmar: 28). Sampled below workers’ pay slips and contracts comply with the Minimum wage Order 2016 as below:</p> <ul style="list-style-type: none"> i. Employee Id: PMM0195 ii. Employee Id: PMM0212 iii. Employee Id: PMM0123 iv. Employee Id: PMM0176 v. Employee Id: PMM0203 	Complied

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		vi. Employee Id: PMM1083	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>There is no contractor's worker hired in Pamol Kluang POM. All workers are directly employed by Headquarters.</p> <p>All sampled workers in 4.4.5.3 has comply with the minimum wage order 2016.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The overtime recorded in the thumb print system with full name, basic wages, work on rest day, public holiday, overtime, public holiday, etc. Sampled workers is as per 4.4.5.3.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>Employment contracts are available and still valid during the audit, It is evident that the contract is also signed by both parties.</p> <p>Sampled workers is as per 4.4.5.3.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>The overtime recorded in the thumb print system with full name, basic wages, work on rest day, public holiday, overtime, public holiday, etc. Sampled workers is as per 4.4.5.3.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>The working hours and breaks are clearly mentioned in the employment contracts as below:</p> <p>Basic wage: RM 38.46/day</p> <p>Overtime: Maximum 4 hours/day @ RM 7.21/hour</p> <p>Working Hours: 8 hours/day. Shift hours will be flexible and fix by Employer.</p> <p>Working days: 6 days/week</p> <p>Rest day: one day/week (will be determined by the Employer).</p>	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Wages and overtime in the pay slips adhered to the minimum wage order 2016 which is RM 1000/month or RM38.46/day.</p>	Complied
4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p>- Minor compliance -</p>	<p>Management has provided the free medical service, free house, subsidize electric rate of RM 5.00/people. Apart from that, there were other social benefits provided such as:</p> <ol style="list-style-type: none"> 1. VLP (Vacation Leave Pay) in year-end salary. 2. Annual Prayers (Muslim, Buddhist, Hindu and Cristian) (Jan 2018). <p>Family Day (March 2018).</p>	Complied
4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p>	<p>During site visit, sighted the linesite area are in good condition as per linesite inspection recorded by Hospital Assistant.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Clean water is provided from SAJ with subsidize rate of Rm 7.70 while electricity with subsidize rate of RM5.00 is provided by TNB.	
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	There is Policy on Harassment at Workplace signed by NB Sudhakaran, Plantation Director in June 2018 mention the grievance channel such as grievance hotline, employee consultative committee, joint consultative committee, gender consultative committee, via email or by post. Apart from that, management also established the Gender Committee Team and sighted the minutes of meeting in 2x/year (31.10.2018 and 14.05.2018).	Complied
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018. Under Human rights and Workplace, management will uphold the right to freedom of association and recognize the right to collective bargaining and allow trade unions to have access to our workers. Pamol Kluang POM has conducted the Mesyuarat Jawatankuasa Perundingan Pekerja in 2 months once (Joint Consultative Committee/JCC) on 09.11.2018 attended by 8 people, 18.09.2018 attended by 11 people, 27.07.2018 attended by 9 people, 14.05.2018 attended by 10 people, 28.03.2018 attended by 10 people and 16.01.2018 attended by 9 people.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.	IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Under Human rights and Workplace, management will eliminate all forms of illegal, forced, bonded, compulsory or child labor and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries. Based on the workers master list, there is no child labour hired.	
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	The annual training program has been established and significantly covers all aspects of the MSPO requirements. There were also additional subjects including the mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The subjects for the training are issued and assisted by the Sustainability Unit. The following topics included in the annual training program 2018/19 among others are extracted below; <ul style="list-style-type: none"> a) OSH Act & regulations 1994. b) Environmental Quality Act 1974 c) Induction Program for new workers. d) OSH Committee and function. e) First Aid Training f) Scheduled waste training g) RSPO/MSPO/ISCC Principles h) HCV & Biodiversity training. i) Mechanical/electrical workshop 	Complied

Criterion / Indicator		Assessment Findings	Compliance																				
		j) Process stations SOP k) Supply chain Records of training were sighted during this audit. Details are shown in 4.4.6.3.																					
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The training needs for the mill financial year 2018/19 training program has been established. The details of the training needs include categories of stations, subjects, and employees' group. Included in this program among others are subjects related to; <ul style="list-style-type: none"> a) Environmental/safety & health policy/scheduled waste management / environmental responsibility, b) Building and structure c) Sustainability practices and guidelines d) Good mill practices - stations operations/control of process parameters e) Social program and other welfare activities. 	Complied																				
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	Training programs are made on annual basis. It is subject for review during the financial year should need arises. These training are made to ensure employees are trained in their job and on to update on current development adopted by the organisation. The training held by the mill during the period of review are shown below; <table border="1" style="margin-top: 10px;"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>No of attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>9/11/18</td> <td>Shovel driving SOP</td> <td>5</td> </tr> <tr> <td>2</td> <td>19/11/18</td> <td>Effluent Pond Operations</td> <td>3</td> </tr> <tr> <td>3</td> <td>22/11/18</td> <td>Working at height SOP</td> <td>10</td> </tr> <tr> <td>4</td> <td>13/11/18</td> <td>Tingkah laku semasa bekerja</td> <td>13</td> </tr> </tbody> </table>	No	Date	Subject	No of attendees	1	9/11/18	Shovel driving SOP	5	2	19/11/18	Effluent Pond Operations	3	3	22/11/18	Working at height SOP	10	4	13/11/18	Tingkah laku semasa bekerja	13	Complied
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4	13/11/18	Tingkah laku semasa bekerja	13																				

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Criterion / Indicator		Assessment Findings				Compliance	
		5	5/11/18	Hoist operations	1		
		6	3/11/18	Tingkah laku semasa bekerja	4		
		7	3/11/18	EFB Station SOP	1		
		8	15/11/18	Working at height	16		
		9	5/11/8	ERP – Fire	Entire		
		10	5/11/18	Laboratory operations	1		
		11	18/10/18	Hearing conservation	23		
		12	20/9/18	Scheduled waste/SDS	9		
		13	12/7/18	Motorcycling Safe riding	46		
		14	21/6/18	Effect on noise hearing	Entire		
		15	29/5/18	Confined space SOP	18		
		16	4/5/18	First Aid	8		
		17	17/5/18	Engine room operations	8		
		18	25/4/18	ERP-Fire Drill	Entire		
		19	31/10/18	Sexual harassment	17		
		20	9/11/18	Grievance policy	20		
		21	13/9/18	Waste segregation	Entire		
		22	23/6/18	Water quality index	6		
		23	23/4/18	Sustainability /,SPO/RSPO/ISCC	Entire		
		24	17/7/18	Internal Audit Procedure	29		
		<p>Bulk of the mill training is organized during the daily briefing prior to work commencement of each shift. Mainly the issues discussed/briefed were related to mill process operations and safety compliance.</p>					

Criterion / Indicator	Assessment Findings	Compliance	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	The policy in relation to environmental is stated in the IOI Group – Sustainable Palm Oil Policy with the latest revision on Mac 2018. The Policy is signed by The Group Chief Executive Officer.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The policy in relation to environmental is stated in the IOI Group – Sustainable Palm Oil Policy latest revised dated Mac 2018 signed by Group Chief Executive Officer. Among others the Policy emphasized on the Environmental Management to include the following; a) Identification & protection of HCV And HCS forest b) Implementation of program to progressively reduce GHG emission, recycle /reuse of palm biomass c) Enforcement of IOI of the NO OPEN BURNING POLICY. d) Adopted no use of paraquat and pesticides categorized by WHO in class 1A or 1B. The IOI sustainability team has prepared the environmental aspect and impacts assessment in term of Environmental Impact Assessment, Management Action Plans and Continual Improvement Plans from November 2015 to November 2020 for Pamol Kluang Palm Oil Mill. The list of the aspect and impacts had covered all the mill activities from the FFB reception to the CPO/CPK despatches. The waste and pollution treatment and management plans are also included.	Complied

Criterion / Indicator		Assessment Findings				Compliance	
4.5.1.3 An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -		The Mill has a planning for the following projects in its Future Continuous Improvement Plan. The projects are also determined for the improvement for the effluent quality as described in 4.5.1.4 below;				Complied	
		No	Improvement Section	Plan	Positive Impacts		Timeline
		1	Boiler Station	To install boiler emission control system and comply with Ringelmann Chart 1	Reduction in black smoke emission		Dec 2019
		2	Biogas Plant	To install biogas plant and capture the biogas for flaring or other uses	Reduction in green house gas emissions into the atmosphere		Dec 2019
		3	Polishing Plant	To comply with DOE requirement as stated in "Jadual Pematuhan"	BOD limit reduced to 20 ppm for water discharge		Dec 2019
4	Effluent Pond System	To perform conventional desludging at cooling pond 1,2,3	To remove solid content in cooling pond 1,2,3	Jan 2019			
4.5.1.4	A programme to promote the positive impacts should be included	The mill had identified new methods in improving the BOD level <100 mg/l for the water discharge. Under the improvement plan the mill					

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Criterion / Indicator		Assessment Findings	Compliance																				
	in the continual improvement plan. - Minor compliance -	had the flowing plan in relation to the effluent management improvement. a) Biogas plant – reduction in GHG into the atmosphere b) Polishing plant – to comply to reduce BOD to 20 ppm for water discharge. c) Effluent pond system – to remove solid content in cooling pond under desludging program -	Complied																				
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	This is available in the annual training program under subject of; <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>No</th> <th>Subjects</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ESH Legal & Other requirements</td> </tr> <tr> <td>2</td> <td>Chemical handling</td> </tr> <tr> <td>3</td> <td>Emergency Respond Plan Training Chemical spill, Fire</td> </tr> <tr> <td>4</td> <td>Scheduled waste management</td> </tr> <tr> <td>5</td> <td>RSPO/ISCC/MSPO Training</td> </tr> <tr> <td>6</td> <td>HIRARC</td> </tr> <tr> <td>7</td> <td>Water Treatment Plant</td> </tr> <tr> <td>8</td> <td>Environmental Management Plan</td> </tr> <tr> <td>9</td> <td>CDS understanding</td> </tr> </tbody> </table>	No	Subjects	1	ESH Legal & Other requirements	2	Chemical handling	3	Emergency Respond Plan Training Chemical spill, Fire	4	Scheduled waste management	5	RSPO/ISCC/MSPO Training	6	HIRARC	7	Water Treatment Plant	8	Environmental Management Plan	9	CDS understanding	Complied
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4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The is made through the EPMC session held 4 times in a year. The dates held to date as recorded below: 12/10/18, 13/7/18, 10/8/18, 12/4/18, 11/1/18 The agenda discussed comprises of the following issues; a) SW discussion/EFB disposal/ b) Effluent/Drainage/GHG/ c) Compliance to the DOE’s COMPETENT PERSON requirement	Complied																				

Criterion / Indicator	Assessment Findings	Compliance																				
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																						
<p>4.5.2.1</p> <p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p>	<p>The Mill consistently monitors the following and tabulates the data monthly.</p> <p>a) The consumption of non-renewable energy (diesel): Direct usage of diesel for the mill operations are recorded. The quantity in mt is divided over the mt CPO produced (ratio) during the month. The performance is measured by this ratio to indicate the level of performance. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel. There were measures as shown in the energy management plan to reduce and eliminate wastages among others as follows;</p> <ul style="list-style-type: none"> - To ensure optimum FFB ramp balance to commence processing - Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages - Regular servicing of turbine for a better efficiency and to minimise running of gen-set - Educate employees on fuel saving practices. <table border="1" data-bbox="1099 1189 1830 1383"> <thead> <tr> <th>Month 18</th> <th>Diesel used/L</th> <th>CPO produced /mt</th> <th>Diesel/CPO</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>6465</td> <td>4354</td> <td>1.48</td> </tr> <tr> <td>Feb</td> <td>4508</td> <td>3431</td> <td>1.31</td> </tr> <tr> <td>Mac</td> <td>3888</td> <td>3443</td> <td>1.13</td> </tr> <tr> <td>April</td> <td>4283</td> <td>3357</td> <td>1.28</td> </tr> </tbody> </table>	Month 18	Diesel used/L	CPO produced /mt	Diesel/CPO	Jan	6465	4354	1.48	Feb	4508	3431	1.31	Mac	3888	3443	1.13	April	4283	3357	1.28	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance																								
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">May</td> <td style="text-align: center;">3043</td> <td style="text-align: center;">3270</td> <td style="text-align: center;">0.93</td> </tr> <tr> <td style="text-align: center;">June</td> <td style="text-align: center;">2345</td> <td style="text-align: center;">3203</td> <td style="text-align: center;">0.73</td> </tr> <tr> <td style="text-align: center;">July</td> <td style="text-align: center;">4146</td> <td style="text-align: center;">3570</td> <td style="text-align: center;">1.16</td> </tr> <tr> <td style="text-align: center;">Aug</td> <td style="text-align: center;">4439</td> <td style="text-align: center;">5284</td> <td style="text-align: center;">0.84</td> </tr> <tr> <td style="text-align: center;">Sept</td> <td style="text-align: center;">4746</td> <td style="text-align: center;">6196</td> <td style="text-align: center;">0.77</td> </tr> <tr> <td style="text-align: center;">Oct</td> <td style="text-align: center;">5438</td> <td style="text-align: center;">6219</td> <td style="text-align: center;">0.87</td> </tr> </table> <p>The mill recorded a range o 0.73 to highest 1.48 for the entire 10 months.</p> <p>b) power production and allocation to the mill machinery and complex generated by steam turbine tabulated for the financial year 2018/19. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB.</p>				May	3043	3270	0.93	June	2345	3203	0.73	July	4146	3570	1.16	Aug	4439	5284	0.84	Sept	4746	6196	0.77	Oct	5438	6219	0.87	
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4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The mill records the following data and tabulated the ratio against the CPO produced to determine the efficiency of their operations;</p> <p>a) all the diesel used (non-renewable) for the mill operations b) fibre/shell (renewable)</p> <p>In this relation the following data were sighted and verified.</p> <p>a) Non-renewable energy usage for 2018/19 for month of Jan 18 – Oct 18. b) Renewable energy usage for 2018 Jan 18-Oct 18 ratio shell/fibre mt /mt CPO average of 0.73</p>				Complied																								
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates</p>				Complied																								

Criterion / Indicator		Assessment Findings	Compliance																																												
		<p>for mulching. Details of renewable energy fibre/shell utilization are recorded below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Shell & fibre /mt</th> <th>CPO produced mt</th> <th>Shell & fibre/CPO</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>3411</td><td>4354</td><td>0.78</td></tr> <tr><td>Feb</td><td>2552</td><td>3431</td><td>0.74</td></tr> <tr><td>Mac</td><td>2562</td><td>3443</td><td>0.74</td></tr> <tr><td>April</td><td>2499</td><td>3357</td><td>0.74</td></tr> <tr><td>May</td><td>2461</td><td>3270</td><td>0.75</td></tr> <tr><td>June</td><td>2418</td><td>3203</td><td>0.75</td></tr> <tr><td>July</td><td>2652</td><td>3570</td><td>0.74</td></tr> <tr><td>Aug</td><td>3813</td><td>5284</td><td>0.72</td></tr> <tr><td>Sept</td><td>4544</td><td>6196</td><td>0.73</td></tr> <tr><td>Oct</td><td>4569</td><td>6219</td><td>0.73</td></tr> </tbody> </table> <p>In summary the total consumption of both shell and fibre over the CPO production is at an average of 0.73. When the renewable energy consumption is maximized the utilization of non-renewable is reduced.</p>	Month	Shell & fibre /mt	CPO produced mt	Shell & fibre/CPO	Jan	3411	4354	0.78	Feb	2552	3431	0.74	Mac	2562	3443	0.74	April	2499	3357	0.74	May	2461	3270	0.75	June	2418	3203	0.75	July	2652	3570	0.74	Aug	3813	5284	0.72	Sept	4544	6196	0.73	Oct	4569	6219	0.73	
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Criterion / Indicator		Assessment Findings	Compliance																										
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>All waste and pollution are identified and documented in the Waste Management Plan 2018/19. The waste and pollution generated from the mill operations as shown below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>List of waste and pollutant</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Spent hydraulic & lubricants oil</td> </tr> <tr> <td>2</td> <td>Spent contaminated rags, oil filters, oil containers</td> </tr> <tr> <td>3</td> <td>POME palm oil mill effluent</td> </tr> <tr> <td>4</td> <td>Stack emission – dust, CO2, SO2, dark smoke</td> </tr> <tr> <td>5</td> <td>Oil & grease</td> </tr> <tr> <td>6</td> <td>Empty Fruit Bunches</td> </tr> <tr> <td>7</td> <td>Boiler Ash</td> </tr> <tr> <td>8</td> <td>Domestic waste</td> </tr> <tr> <td>9</td> <td>Chemical waste & chemical containers</td> </tr> <tr> <td>10</td> <td>Spent batteries</td> </tr> <tr> <td>11</td> <td>Scrap metal and tyres</td> </tr> <tr> <td>12</td> <td>Sewage</td> </tr> </tbody> </table>	No	List of waste and pollutant	1	Spent hydraulic & lubricants oil	2	Spent contaminated rags, oil filters, oil containers	3	POME palm oil mill effluent	4	Stack emission – dust, CO2, SO2, dark smoke	5	Oil & grease	6	Empty Fruit Bunches	7	Boiler Ash	8	Domestic waste	9	Chemical waste & chemical containers	10	Spent batteries	11	Scrap metal and tyres	12	Sewage	Complied
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4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>The Waste Management Plan listed the waste generated from the mill operations among others as listed below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Description</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Industrial waste</td> <td>EFB</td> <td>Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage</td> </tr> </tbody> </table>	No	Type of waste	Description	Action to be taken	1	Industrial waste	EFB	Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage	Complied																		
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Criterion / Indicator		Assessment Findings		Compliance
			<p>To ensure no open burning activity on EFB and mill waste To design EFB storage area in ensuring no spillage of leachate into monsoon drain.</p> <p>Scrap iron Dispose as sale to assigned vendor by Regional office/Head Office. Recycle where appropriate for workshop maintenance</p> <p>POME Treated in effluent plant. The final discharge from the treatment plant is used for water discharge. Effluent quality monitoring on monthly basis. The monitoring of the effluent discharge is reported to DOE on monthly and quarterly basis. This practice is accordance with the requirements in the written approval issued by DOE. Review of the results revealed that the quality of the effluent discharge is in within the regulatory limit.</p> <p>Boiler ash Disposed to designated dumping site near holding pond Daily leveling monthly using machine.</p>	
		2	<p>Scheduled Waste SW305/306/102/410/109 SW409/410/322/429</p> <p>Clean and tidy storage area Separation of type SW using labels 10cm x 10cm To ensure spillage trap functions effectively Monthly stock verification by executives</p>	

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Criterion / Indicator		Assessment Findings			Compliance
				<p>Ensure inventory not exceeding 180 days / 20 mt Follow approved consignment note and update in ESWIS Provide training to the SW handlers.</p>	
		3	<p>Domestic Waste</p> <p>Rubbish/ garden waste</p>	<p>Disposal made 3x /week for both mill/estate on a different day. Encourage recycling program currently maintained by an assigned employee. Disposal to Local Municipal Council landfill. Provide adequate dustbins line sites /office complex Weekly inspection by MA/executives Awareness on hygiene.</p>	
			<p>Sewage</p>	<p>Provide adequate washrooms/toilets at mill and line sites To ensure employees' quarters equipped with appropriate septic tank Cleaning/desludging septic tank done by appointed contractor.</p>	
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>The SOP for Scheduled Waste has been established and documented in <i>SOP Ref no IOI -OSH 3.2.2</i> dated 12/3/18 compiled in the Group Standard Operating Procedures for Palm Oil Mill. Therein the procedure described the following requirement in details;</p> <ul style="list-style-type: none"> a) Labeling b) Legal requirement c) Waste generator d) Training required e) DOE license 			Complied

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Criterion / Indicator		Assessment Findings	Compliance												
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Effective Oct 18, the estate management handles the domestic waste management of the mill. It is collected 3x /week and centralized prior to disposal to City Council disposal site.	Complied												
Criterion 4.5.4: Reduction of pollution and emission															
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The pollution identified from the mill activities as described below; <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table>	No	Type of waste	Details	1	Black smoke	Emission from Boilers	2	Odour & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	Complied
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4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The action plan to reduce the pollutions are as follows; <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>To monitor the condition of dust cyclone in every 3 months. To carry out boiler furnace cleaning every week.</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour. Maintain 1:1 ratio of acidification process.</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Ensure SOP to be strictly followed. To place all lubricant oil drum on metal trays.</td> </tr> </tbody> </table>	No	Type of waste	Action Plan	1	Black smoke	To monitor the condition of dust cyclone in every 3 months. To carry out boiler furnace cleaning every week.	2	Odour & gases	To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour. Maintain 1:1 ratio of acidification process.	3	Leakage of lubricant	Ensure SOP to be strictly followed. To place all lubricant oil drum on metal trays.	Complied
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		All efforts and action plan for the identified pollutants and emission above is adequate to comply with the requirement. All identified issues have significant impacts to the environment.																																				
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>The treated mill effluent discharge is regularly monitored as prescribed in the "<i>Jadual Pematuhari</i>" license issued to the mill. The limit for the Biochemical Oxygen Demand (BOD) discharge is <100 mg/l for water course. The improvement program to achieve the BOD level is shown in 4.5.5.2. Regular monitoring is made on monthly basis and quarterly. In addition, daily site checking on the effluent ponds are made by the supervisory personnel and effluent attendants. Reports for the effluent parameters are submitted using "<i>Borang Penyata Suku Tahun</i>" to DOE for compliance. Sighted the effluent results in the laboratory at random and all parameters comply to the DOE requirement. (Units in mg/l except for PH)</p> <table border="1"> <thead> <tr> <th>Parameters</th> <th>Standard</th> <th>16/7/18</th> <th>17/8/18</th> <th>19/9/18</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>5-9</td> <td>8.3</td> <td>7.7</td> <td>7.9</td> </tr> <tr> <td>BOD</td> <td>100</td> <td>148</td> <td>135</td> <td>208</td> </tr> <tr> <td>Suspended solids</td> <td></td> <td>2570</td> <td>910</td> <td>13210</td> </tr> <tr> <td>Oil & grease</td> <td>50</td> <td>6.0</td> <td>4.80</td> <td>2.00</td> </tr> <tr> <td>Ammoniacal N</td> <td>150</td> <td>6.90</td> <td>14.90</td> <td>22.00</td> </tr> <tr> <td>Total N</td> <td>200</td> <td>9.00</td> <td>20.70</td> <td>6.90</td> </tr> </tbody> </table> <p>The mill had identified new methods in improving the BOD level <100 mg/l for the water discharge. Under the improvement plan the mill</p>	Parameters	Standard	16/7/18	17/8/18	19/9/18	PH	5-9	8.3	7.7	7.9	BOD	100	148	135	208	Suspended solids		2570	910	13210	Oil & grease	50	6.0	4.80	2.00	Ammoniacal N	150	6.90	14.90	22.00	Total N	200	9.00	20.70	6.90	Complied
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Criterion 4.5.5: Natural water resources																																															
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>The mill has established a water management plan. Among others the efforts and program associated are:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. <table border="1"> <thead> <tr> <th>Month</th> <th>Water usage m3</th> <th>CPO mt</th> <th>Water usage/CPO produced</th> </tr> </thead> <tbody> <tr><td>Jan 18</td><td>14392</td><td>4354</td><td>3.28</td></tr> <tr><td>Feb 18</td><td>10725</td><td>3431</td><td>3.13</td></tr> <tr><td>Mac 18</td><td>10850</td><td>3443</td><td>3.15</td></tr> <tr><td>April 18</td><td>11200</td><td>3357</td><td>3.34</td></tr> <tr><td>May 18</td><td>10568</td><td>3270</td><td>3.23</td></tr> <tr><td>June 18</td><td>10845</td><td>3203</td><td>3.38</td></tr> <tr><td>July 18</td><td>20890</td><td>3570</td><td>5.85</td></tr> <tr><td>Aug 18</td><td>18825</td><td>5284</td><td>3.56</td></tr> <tr><td>Sept 18</td><td>23049</td><td>6196</td><td>3.72</td></tr> <tr><td>Oct 18</td><td>20374</td><td>6219</td><td>3.28</td></tr> </tbody> </table>	Month	Water usage m3	CPO mt	Water usage/CPO produced	Jan 18	14392	4354	3.28	Feb 18	10725	3431	3.13	Mac 18	10850	3443	3.15	April 18	11200	3357	3.34	May 18	10568	3270	3.23	June 18	10845	3203	3.38	July 18	20890	3570	5.85	Aug 18	18825	5284	3.56	Sept 18	23049	6196	3.72	Oct 18	20374	6219	3.28	Complied
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Criterion / Indicator		Assessment Findings				Compliance																																								
		<p>b) The upstream and downstream water analysis of <i>Sg Sembrong</i> was made to monitor the negative impact resulted from the mill activities. Sighted results dated 20/9/18. This requirement has also been stated in the <i>Jadual. Pematuhan</i> in The DOE license.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Item</th> <th>OM1 Upstream</th> <th>OM2 - downstream</th> <th>Std NWQS Class II</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>6.9</td> <td>6.6</td> <td>5.0-9.0</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>10</td> <td>5</td> <td>6</td> </tr> <tr> <td>3</td> <td>COD</td> <td>35</td> <td>20</td> <td>50</td> </tr> <tr> <td>4</td> <td>Suspended solids</td> <td>40</td> <td>30</td> <td>150</td> </tr> <tr> <td>5</td> <td>Ammoniacal N</td> <td>6.1</td> <td>1.1</td> <td>0.9</td> </tr> <tr> <td>6</td> <td>Total solids</td> <td>130</td> <td>100</td> <td>-</td> </tr> <tr> <td>7</td> <td>Total Coliform count</td> <td>>1600</td> <td>>1600</td> <td>50000</td> </tr> </tbody> </table> <p>All units in mg/L except for PH.</p> <p>a) The water management plan in the mill has been established focusing on the water pollution prevention and efforts in relation to the domestic usage. Among others the objectives are;</p> <ul style="list-style-type: none"> - To minimize impact of drought and floods to the POM and estate operations, - To minimize the impact of drought to the oil palm yield, - To optimize the use of rain water and fresh water from streams, 				No	Item	OM1 Upstream	OM2 - downstream	Std NWQS Class II	1	PH	6.9	6.6	5.0-9.0	2	BOD	10	5	6	3	COD	35	20	50	4	Suspended solids	40	30	150	5	Ammoniacal N	6.1	1.1	0.9	6	Total solids	130	100	-	7	Total Coliform count	>1600	>1600	50000	
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Criterion / Indicator		Assessment Findings	Compliance
		<p>- Maximizing use of pollutants and waste (eq. effluent and EFB from oil mill)</p> <p>In addition, the Mill has installed 10 units of flow meter to record the daily water usage from Pamol Timur, Pamol Barat and mill's domestic and processing purpose. Water was pumped from Sg Sembrong daily.</p>	
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>Details of effluent treatment and report as provided in 4.5.4.3 above. The effluent is retained for treatment in a flow through several / multiple stage ponds before being discharged into the watercourse and land application at ratio of 70% and 30% respectively. The compliance requirement is provided in the DOE <i>'Jadual Pematuhar'</i> licensed to the mill. The final BOD is <100 mg/l for the water discharge. Under the improvement plan the mill had the flowing plan in relation to the effluent management improvement.</p> <ul style="list-style-type: none"> g) Biogas plant – reduction in GHG into the atmosphere h) Polishing plant – to comply to reduce BOD to 20 ppm for water discharge. i) Effluent pond system – to remove solid content in cooling pond under desludging program. 	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p>	<p>The Mill adopted the following manual and SOP for the day-to-day operations</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<ul style="list-style-type: none"> a) GROUP STANDARD OPERATING PROCEDURES FOR PALM OIL MILL dated Mac 2012 thereafter revised to include new work methods etc / others dated July 2018. All processing stations starting from FFB reception to dispatch and workshop/maintenance. laboratory operations b) Safe Operating Procedures and guidelines. 	
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>The following reports are established to monitor the mill operations</p> <ul style="list-style-type: none"> a) Daily production report b) Progress report <ul style="list-style-type: none"> i. FFB quality / Extraction Ratios ii. Qualities issues/complaints iii. MPD analysis iv. Manpower v. Process control vi. Mill throughput /downtime vii. Water consumption viii. Processing cost /CAPEX. c) The Mill Controller visits the mill every 2 months. d) Unscheduled visits by the Plantation Director. 	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>Pamol Kluang POM and supply base have established and implemented its commitment to a long term sustainability and financial viability through an operating expenditure /capital expenditure planning. The mill has a budget for financial year July-June comprises of the following components;</p> <ul style="list-style-type: none"> a) Crop processed with anticipated extraction ratios including a 5-year forecast. b) Cost components include the following 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> i) <i>General charges statement</i> <ul style="list-style-type: none"> - General charges - Cost of supervision - Cost of labour - Cost of other - Cost of RSPO/MSPO & Other Management system ii) <i>Capital expenditure statement</i> <ul style="list-style-type: none"> - Building, utilities, welfare - Plant & machinery - Office equipment - Furniture & fittings - Electrical installation iii) Plant Factory inclusive of manufacture cost/dispatch cost iv) Processing Cost <p>The five years planning horizon 2018/19-2022/23 is available.</p>	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pamol Kluang POM only receive the FFB from own supply bases therefore no price is displayed in the mill.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Pamol Kluang POM only receive the FFB from own supply bases therefore no agreement/contract for the products/service.	Complied
Criterion 4.6.4: Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	In the agreement, there is additional requirements for contractor and service providers mentioned that contractors are to comply with all applicable local, national and ratified international laws and regulations including sustainability requirement (RSPO, MSPO, ISCC, etc). Evidence or related documents are to be available and presented to the Company for verification whenever necessary.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Sampled agreement for transport of CPO for Syarikat Eastern Trading & Transport valid from 01.09.2017 – 31.08.2019. The table of price from Pamol POM to Pasir Gudang and Kulai was made clear and signed by both parties and stamped on 02.11.2017. Sighted the payment voucher; voucher no: PBV-049/10/18 dated 25.10.2018 cheque no: MBB M2E amount RM 21,973.83.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	In the agreement, there is additional requirements for contractor and service providers mentioned that contractors are to comply with all applicable local, national and ratified international laws and regulations including sustainability requirement (RSPO, MSPO, ISCC, etc). Evidence or related documents are to be available and presented to the Company for verification whenever necessary.	Complied

Malaysian Sustainable Palm Oil Part 3: General principles for Plantations and Organized Smallholders

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	IOI Group has the Sustainable Palm Oil Policy signed by Dato’ Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy mentioned that IOI group is committing towards sustainable production of palm oil and its continuous improvement as outlined in the Malaysian Sustainable Palm Oil (MSPO) guidelines.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	SOP on Sustainability, SOP 1.7 issue/rev: 1/1, date 03.05.2018. Frequency for audit is conducted regularly based on non-conformances, complexity and maturity of the processes.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.	The sustainability, safety & health department (peninsular) has conducted the internal audit on 08.10.2018 (Pamol Timur Estate), 01.10.2018 (Unijaya Estate) and 19.09.2018 (Pamol Barat Estate). There were 16 NCs and 19 OFI (Pamol Timur Estate), 24 NCs and 20	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	OFI (Unijaya Estate) and 17 NCs and 4 OFI (Pamol Barat Estate) raised.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit report is available during the audit and the outcomes were discussed during the management review as per 4.1.3.1	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	<p>Management review has been conducted in 2 stages which are estate level and complex level.</p> <p>In estate level, the management review has been conducted on 20.10.2018 attended by 5 people (Pamol Timur Estate), 03.11.2018 attended by 7 people (Unijaya Estate) and 24.11.2018 attended by 6 people (Pamol Barat Estate) while for complex level is conducted on 19.11.2018 at Pamol Club, Meeting Room attended by management team representative (21 people) and sustainability team representative (6 people) includes all business units in Pamol Kluang Complex.</p> <p>The agenda discussed the results of audits, customer feedback, status of preventive and corrective actions, follow-up actions from management reviews, changes that could affect the management system and recommendations for improvement.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.1.4 – Continual Improvement		
<p>4.1.4.1</p> <p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>Pamol Timur Estate, Unijaya Estate and Pamol Barat Estate has the future continuous improvement plan categorized by grievance procedure, executive bungalows & staff quarters, facilities/amenities/workers linesite and social contribution/corporate social responsibility (CSR). There are plan to achieve it, target to be completed and person in charge appointed accordingly.</p> <p>Example seen are:</p> <ol style="list-style-type: none"> 1. To renovate 28 houses for workers (Pamol Timur Estate). 2. To improve the piping and drainage system at workers linesite (Pamol Timur Estate). 3. To provide multifilter water machine for all workers (Unijaya Estate). 4. To upgrade the community hall and volleyball court (Unijaya Estate). 5. Repainting 4 units Executive Bungalows & 10 units staff house (Pamol Barat Estate). 6. Propose to build community hall on next year (2019/2020). 	<p>Complied</p>
<p>4.1.4.2</p>	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>Pamol Timur Estate & Unijaya Estate has plan to have mechanization.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	In Pamol Barat Estate, there is plan to purchase Rotorslasher HS 34/150 as mechanical sprayer in field dated 22.10.2018 amounted RM 9,100.00.	
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	The management able to show the supporting documents during the audit, ie: training, resources and progress reports on the business management plan.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	Management has conducted the annual stakeholder meeting, disseminate the information through website: www.ioigroup.com , establishing the complaint/grievance book for internal complaint and external stakeholder’s file. For stakeholder request, the SOP Stakeholder Request Procedure, SOP 1.0, Appendix 4, issue/rev: 1/0 mentioned the flowchart of the request and SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which takes 5 days for action taken by the management.	Complied
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative	The management able to show the documents during the audit, ie: company policies, communication records, minutes of meeting, internal audit reports, etc.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	environmental or social outcomes. - Major compliance -		
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	For stakeholder request, the SOP Stakeholder Request Procedure, SOP 1.0, Appendix 4, issue/rev: 1/0 mentioned the flowchart of the request and SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which takes 5 days for action taken by the management.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	Management has appointed Mr. Mohammad Akmal Azwan Affendi bin Daud (Assistant Manager) for Pamol Timur, Mr. Pavithiran Anpalakan, (Cadet Assistant Manager) for Unijaya Estate and Mr. Mohammad Naim, Assistant Manager for Pamol Barat Estate as the Social Liaison Officer as per appointment letter dated 15.01.2018, 02.08.2018 and 01.09.2017. His responsibility covers welfare and social needs of stakeholders, periodic visits to neighbouring stakeholders, maintenance and monitoring of grievance issues and facilitate feedback mechanism, etc.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	The stakeholder list reviewed on 17 th May 2018 for Pamol Timur Estate, 24 th November 2018 for Unijaya Estate and 22 nd October 2018 for Pamol Barat Estate are available and updated accordingly. The stakeholders comprise of government bodies, non-govt. organization (NGO's), contributing estates/supply base estates, neighbouring villages, suppliers, contractors, transporters, schools, mill management, JCC members and worshipping areas.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		The latest stakeholder minutes meeting available dated 12.11.2018 (internal) and 29.10.2018 (external) for Pamol Timur Estate, 27.10.2018 (internal) and 21.11.2018 (external) for Unijaya Estate and 29.10.2018 for internal and external at Pamol Barat Estate. All positive and negative issues captured in the SIA management plan.	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	IOI group has the SOP title: MSPO Supply Chain – Oil Mill: Segregation (SG), doc. No: MSPOSC/SOP/SG/1, revision: 00 dated 20.10.2018.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The traceability of the FFB, PK, CPO and PKO are inspected through the internal audit conducted as per 4.1.2.2	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Mr. Derek Michael Duraisingam, Cadet Assistant Manager (Pamol Timur Estate), Mr. Kamarul Ariffin, Estate Assistant Manager (Unijaya Estate) and Mr. Ahmad Shahel Rizaihan, Estate Assistant Manager appointed as RSPO, MSPO & ISCC Supply Chain Officer on 05.03.2018, 14.07.2018 and 01.01.2017.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Pamol Timur Estate are using millcomp system and PINFOSYS (Plantation Integrated Management/System) to monitor the daily and monthly incoming FFB and outgoing CPO and PKO. During the site visit, it was evident that the system able to show the traceability for certified FFB and CPO/PKO. However, since MSPO is not yet certified,	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>the traceability demonstration been shown for RSPO supply chain as it will apply the same method in future (certificate number and certified product).</p> <p>Seen the below samples:</p> <ol style="list-style-type: none"> 1) FFB Weighbridge ticket no: 284727 dated 26.11.2018, 6460 kg and supplier: Pamol Timur. 2) Summary of Daily Infield Grading Report by Gang, Estate gang ref: H01 dated 26.11.2018. 3) FFB Weighbridge ticket no: 284756 dated 26.11.2018, 22,130 kg and supplier: Unijaya Estate. 4) Daily FFB Field Balance Report on 26.11.2018 (Pamol Barat Estate). 	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>In Pamol Barat Estate, Worker ID: PBE2676, PBE2948 and PBE2792 has the salary deduction for electricity bill for month of June, August and October 2018 without the salary deduction permit from Labour Department.</p> <p>All the estates (<i>within the Pamol Kahang CU</i>) continued to comply with legal requirements as per the indicator. Compliance to each applicable law and regulation is monitored by the operating units and the sustainability team. The CU had obtained and renewed license and</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																				
		<p>permits as required by the law. The licenses/permit viewed among others were:</p> <p>a) Pamol Timur Estate</p> <table border="1"> <thead> <tr> <th>No</th> <th>Licence / Permit / Regulatory Requirement</th> <th>Validity Period/Ref</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>JTK-Pemontongan Gaji – Insurans ref PP3/34/1069</td> <td>Effective 24/6/05</td> </tr> <tr> <td>2</td> <td>MPOB-FFB menjual & mengalih ref no 504178602000</td> <td>1/6/18-31/5/19</td> </tr> <tr> <td>3</td> <td>KPDNKK – Diesel storage 18000 litres</td> <td>30/1/8-29/1/19</td> </tr> <tr> <td>4</td> <td>Air compressor – JH PMT 13794</td> <td>29/10/19</td> </tr> <tr> <td>5</td> <td>Firearms – KLG/A/1566</td> <td>Effective 28/11/17</td> </tr> </tbody> </table> <p>b) Unijaya Estate</p> <table border="1"> <thead> <tr> <th>No</th> <th>Licence / Permit / Regulatory Requirement</th> <th>Validity Period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB-FFB menjual & mengalih ref no 504524202000</td> <td>1/8/18-31/7/19</td> </tr> <tr> <td>2</td> <td>KPDNKK – Diesel storage 13000 litres</td> <td>31/7/18-30/7/19</td> </tr> <tr> <td>3</td> <td>Air compressor – JH PMT 10717</td> <td>29/10/19</td> </tr> <tr> <td>4</td> <td>BAKAJ ref no 334/300/05/02/07/34</td> <td>28/10/18</td> </tr> <tr> <td>5</td> <td>Metrology Corporation B1155417</td> <td>02/1/18</td> </tr> </tbody> </table>	No	Licence / Permit / Regulatory Requirement	Validity Period/Ref	1	JTK-Pemontongan Gaji – Insurans ref PP3/34/1069	Effective 24/6/05	2	MPOB-FFB menjual & mengalih ref no 504178602000	1/6/18-31/5/19	3	KPDNKK – Diesel storage 18000 litres	30/1/8-29/1/19	4	Air compressor – JH PMT 13794	29/10/19	5	Firearms – KLG/A/1566	Effective 28/11/17	No	Licence / Permit / Regulatory Requirement	Validity Period	1	MPOB-FFB menjual & mengalih ref no 504524202000	1/8/18-31/7/19	2	KPDNKK – Diesel storage 13000 litres	31/7/18-30/7/19	3	Air compressor – JH PMT 10717	29/10/19	4	BAKAJ ref no 334/300/05/02/07/34	28/10/18	5	Metrology Corporation B1155417	02/1/18	
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4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>All the estates have identified and documented their legal register with written information on legal requirements applicable to their operation. The record titled "<i>Legal Requirement Register</i>" initiated by the Legal and sustainability unit based at Head Office responsible to track changes in the law with the information disseminated to all of its plantations and mills. The identified legal among others includes;</p> <ul style="list-style-type: none"> a) Pesticides Act 1974 and Regulations, b) Environmental Quality Act and Regulations 1974, c) Factories and Machinery Act and Regulations, 1967 d) Electricity Regulations 1994 e) Immigration Act 1959 f) Occupational Safety and Health Act 1994 g) Employment Act 1955 h) Aboriginal Peoples Act 1954 i) Industrial Relations Act 1967 j) Children and Young Persons (Employment) Act 1966 k) MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977 	Complied																		

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Criterion / Indicator		Assessment Findings	Compliance
		l) Industrial Code of Practice for Confined Space 2010. m) Personal Data Protection Act 2010 n) Destruction of Disease Bearing Insects Act 1975	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	The mechanism used for tracking changes in laws/regulations are through the following; a) Subscription to Lexis-Nexis Malaysia b) News release through daily newspaper. c) Law change tracked by book publisher (MDC Book Publications). d) Circulars from relevant association (eg. MPOA, MPOB, MAPA) e) Internet (e-federal gazette, www.lawnet.com.my, www.e-warta.com.my) The IOI Legal Department from headquarters alert all operating units on legal updates. Process flow for the Legal updating is shown in SOP reviewed dated Mac 2018.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	All estates assigned one executive each for the PIC for compliance and changes in the regulatory requirement. In Pamol Timur Estate - The PIC is an Assistant Manager; En Mukhlis Mukhtar via letter dated 01/1/18 signed by the Estate Manager.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	No land disputes reported at Pamol Timur Estate, Unijaya Estate and Pamol Barat Estate. It is verified during the stakeholder’s meeting and land titles record.	Complied

Criterion / Indicator		Assessment Findings						Compliance																																																																				
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>The details of documents showing legal ownership of land occupied by the estates as shown below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Title no</th> <th>Lot no</th> <th>locality</th> <th>Plan no.</th> </tr> </thead> <tbody> <tr> <td rowspan="4">1</td> <td rowspan="4">Pamol Barat</td> <td>HSD 790</td> <td>9227</td> <td>Kluang</td> <td>29434</td> </tr> <tr> <td>HSD 791</td> <td>9228</td> <td>Kluang</td> <td>29434</td> </tr> <tr> <td>HSD 73767</td> <td>PTD89116</td> <td>Kluang</td> <td>0926</td> </tr> <tr> <td>G 56272</td> <td>1877</td> <td>kluang</td> <td>16879</td> </tr> <tr> <td rowspan="5">2</td> <td rowspan="5">Pamol Timur</td> <td>G88881</td> <td>2429</td> <td>Kluang</td> <td>15085</td> </tr> <tr> <td>G90779</td> <td>2593</td> <td>Kluang</td> <td>16444</td> </tr> <tr> <td>G90780</td> <td>2594</td> <td>Kluang</td> <td>16444</td> </tr> <tr> <td>G94673</td> <td>2589</td> <td>Kluang</td> <td>15571</td> </tr> <tr> <td>G88885</td> <td>2430</td> <td>Kluang</td> <td>15085</td> </tr> <tr> <td rowspan="5">3</td> <td rowspan="5">Unijaya</td> <td>MKG01221</td> <td>902</td> <td>Kluang</td> <td>12859</td> </tr> <tr> <td>MKG 02120</td> <td>3283</td> <td>Kluang</td> <td>21160</td> </tr> <tr> <td>MKG02138</td> <td>3300</td> <td>Kluang</td> <td>21160</td> </tr> <tr> <td>GRN80038</td> <td>3020/3021</td> <td>Kluang</td> <td>15040</td> </tr> <tr> <td>Grn81092</td> <td>860</td> <td>Kluang</td> <td>14300</td> </tr> </tbody> </table> <p>Unijaya Estate had the highest no of land title as sighted, hence the above records were taken based on random. However, the entire land title was checked and in compliance to the legislative requirement.</p>						No	Estate	Title no	Lot no	locality	Plan no.	1	Pamol Barat	HSD 790	9227	Kluang	29434	HSD 791	9228	Kluang	29434	HSD 73767	PTD89116	Kluang	0926	G 56272	1877	kluang	16879	2	Pamol Timur	G88881	2429	Kluang	15085	G90779	2593	Kluang	16444	G90780	2594	Kluang	16444	G94673	2589	Kluang	15571	G88885	2430	Kluang	15085	3	Unijaya	MKG01221	902	Kluang	12859	MKG 02120	3283	Kluang	21160	MKG02138	3300	Kluang	21160	GRN80038	3020/3021	Kluang	15040	Grn81092	860	Kluang	14300	Complied
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4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>Boundary markers were installed at various points at the boundary areas. Sighted the following visited areas as shown below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Boundary markers points</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pamol Timur</td> <td>P09E</td> <td>Mr Khoo. smallholder</td> </tr> </tbody> </table>						No	Estate	Boundary markers points	Neighbouring	1	Pamol Timur	P09E	Mr Khoo. smallholder	Complied																																																												
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Criterion / Indicator		Assessment Findings				Compliance
		2	Unijaya	P16A	Smallholder	
		3	Pamol Barat	PM14C	Pamol Timur & Tradewinds – Pak Loh	
				PR16B	Johor lumbering Sdn Bhd.	
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	No land disputes reported at Pamol Timur Estate, Unijaya Estate and Pamol Barat Estate. It is verified during the stakeholder’s meeting and land titles record.				Complied
Criterion 4.3.3 – Customary rights						
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	No land disputes reported at Pamol Timur Estate, Unijaya Estate and Pamol Barat Estate. It is verified during the stakeholder’s meeting and land titles record.				Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	No land disputes reported at Pamol Timur Estate, Unijaya Estate and Pamol Barat Estate. It is verified during the stakeholder’s meeting and land titles record.				Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	No land disputes reported at Pamol Timur Estate, Unijaya Estate and Pamol Barat Estate. It is verified during the stakeholder’s meeting and land titles record. However, management has the SOP for FPIC, SOP 2.0 & 6.0 Appendix 3, Issue/Revision: 1/0, dated 17.01.2017 and Land Use Compensation Procedure, SOP: 2.0 & 6.0 Appendix 5, Issue/Revision: 1/0 dated 17.01.2017.				Complied

Criterion / Indicator	Assessment Findings	Compliance
4.4 Principle 4: Social responsibility, health, safety and employment condition		
Criterion 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1 Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Pamol Timur Estate, Unijaya Estate and Pamol Barat Estate are having the Social Impact Assessment, management action plans and continuous improvement plans 2015-2021, 2015-2020 and 2015-2020 prepared by sustainability team and approved by Estate manager in charge on 22.11.2015 (Pamol Timur Estate), 15.11.2015 (Unijaya Estate) and 17.11.2015 (Pamol Barat Estate).	Complied
Criterion 4.4.2: Complaints and grievances		
4.4.2.1 A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	IOI group has the SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which takes 5 days for action taken by the management and Whistleblowing Policy revised November 2017 to provide a transparent and confidential process for dealing with concerns.	Complied
4.4.2.2 The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	As per policy, the complaint/grievances lodged been solved within the timeframe. Seen the complaint/grievance book which stated the complaints lodged been solved.	Complied
4.4.2.3 A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Management has keep the complaint/grievance record for internal and external stakeholders. Apart from this, the external stakeholder shared their concerns and complaints through stakeholder's meeting.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Sighted the complaint form titled 'breakdown report' used by the workers for the issues raised.	
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	This has been communicated through the stakeholders meeting and complaint/grievance book.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Complaint records are available since 2007 in the complaint/ grievance book.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Among the contributions made are: 1. Donation of RM 300 for annual sports to SK Ladang Bukit Benut on 08 th March 2018 (Pamol Timur Estate). 2. Request for the use of Estate, Community Hall, Futsal Court and Football field for School Children use from SJK(T) Ladang Pamol on 24.01.2018 (Pamol Timur Estate). 3. Contribute for transportation for workers to Teluk Kemang dan Melaka (Unijaya Estate). 4. Contribution RM 3000 to SK Ladang Pamol from Yayasan Tan Sri Lee Shin Cheng on 03.03.2018 (Pamol Barat Estate).	Complied
Criterion 4.4.4: Employees safety and health			

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Criterion / Indicator		Assessment Findings	Compliance												
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	An Occupational Safety, Health And Hygiene Policy has been established on 03/3/18 and signed by the Plantation Director. Among others the Organization is committed to the following; <ul style="list-style-type: none"> i) Complying to all national laws and regulations. ii) Assessing all health and safety risks to work activities iii) Conducting regular inspection at workers houses. iv) Investigating and finding causes of accidents and take appropriate measures to prevent recurrence of such incidents. v) Preparing emergency procedures for major accidents/incidents. 	Complied												
4.4.4.2	The occupational safety and health plan shall cover the following: <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations 	The Objectives of Safety And Health 2018 among other include the following; <ul style="list-style-type: none"> 1) Reduce rate of accidents and others by 10%. 2) Allocate min 0.2% of total man-hours to conduct safety and health related activities. 3) Workers assigned to machines shall be provided with Safe Operating Procedures before work commencement. Investigation made to determine root causes and immediate corrective measures for all accidents resulting in more than 4 MC. <p>HIRARC for the estates was formalized in 2008 with latest review made on 06/02/18. The significant and routine activities were adequately covered with details as;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No</th> <th>Areas/Activities</th> <th>No</th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chemical spraying</td> <td>7</td> <td>Electrical works</td> </tr> <tr> <td>2</td> <td>Collection – buffalo</td> <td>8</td> <td>Transporting FFB to mill</td> </tr> </tbody> </table>	No	Areas/Activities	No	Areas /Activities	1	Chemical spraying	7	Electrical works	2	Collection – buffalo	8	Transporting FFB to mill	Complied
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<p>as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p>	<table border="1" data-bbox="1064 448 1861 584"> <tr> <td>3</td> <td>Harvesting</td> <td>9</td> <td>Tractor driving</td> </tr> <tr> <td>4</td> <td>Chemical store</td> <td>10</td> <td>Fire outbreak</td> </tr> <tr> <td>5</td> <td>Pruning</td> <td>11</td> <td>Bag worm treatment</td> </tr> <tr> <td>6</td> <td>Road maintenance</td> <td>12</td> <td>Workshop operations</td> </tr> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery in the workshop/vehicles were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at the estate complexes and housing areas. In general, the control measures were appropriate to the identified risks.</p> <p>The estates issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes, rubber boots. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire & PPE. The field visits covered activities of harvesting, fertiliser application and spraying Acknowledgement of receipt was recorded.</p> <p>The SOP for chemical handling is described in <i>SOP Bab 17 issue no 2</i> dated 1/8/18. Therein the content stating the following details;</p> <ol style="list-style-type: none"> 1) A trained person to handle chemicals 2) PPE adherence 3) Handling details before and after 4) Emergency situation procedures. 	3	Harvesting	9	Tractor driving	4	Chemical store	10	Fire outbreak	5	Pruning	11	Bag worm treatment	6	Road maintenance	12	Workshop operations	
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Criterion / Indicator	Assessment Findings	Compliance																																				
<p>- Major compliance -</p>	<p>Each estate Managers appoints an Assistant Manager as the person in charge for safety and environment through an official letter. Pamol Timur Estate letter dated 10/11/17 for such an appointment was sighted. The PIC role of which includes areas on safety & health of the staff/workers. The Estates Managers in turn are appointed as the Chairman for the ESH committee duties among other to preside the ESH meetings signed by the Plantation Controller. The appointment letters individually was sighted and verified.</p> <p>The Manager in addition subsequently assigned duties of ESH coordinator to the Assistants/Supervisors for the down line implementation of ESH practices in the estates. The Estates management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meetings held are recorded below.</p> <table border="1" data-bbox="1182 965 1742 1268"> <thead> <tr> <th colspan="4">Pamol Timur Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>13/9/18</td> <td>3</td> <td>8/3/18</td> </tr> <tr> <td>2</td> <td>11/6/18</td> <td>4</td> <td>26/12/17</td> </tr> <tr> <th colspan="4">Pamol Barat Estate</th> </tr> <tr> <td>1</td> <td>24/9/18</td> <td>3</td> <td>22/3/18</td> </tr> <tr> <td>2</td> <td>21/6/18</td> <td>4</td> <td>23/12/17</td> </tr> <tr> <th colspan="4">Unijjaya Estate</th> </tr> <tr> <td>1</td> <td>26/10/18</td> <td>3</td> <td>25/4/18</td> </tr> <tr> <td>2</td> <td>24/7/18</td> <td>4</td> <td>29/1/18</td> </tr> </tbody> </table> <p>The minutes of meeting were sighted and verified. Workers during the meeting participated in the discussion mainly on housing and safety.</p>	Pamol Timur Estate				1	13/9/18	3	8/3/18	2	11/6/18	4	26/12/17	Pamol Barat Estate				1	24/9/18	3	22/3/18	2	21/6/18	4	23/12/17	Unijjaya Estate				1	26/10/18	3	25/4/18	2	24/7/18	4	29/1/18	
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	<p>The agenda as discussed during the meeting among others includes the following;</p> <ul style="list-style-type: none"> g) <i>Laporan Pemakaian PPE</i> h) <i>Laporan Prestasi ESH/Kesehatan</i> i) <i>Laporan LatIhan & SOP/HIRARC</i> j) <i>Laporan Pematuhan Undang-Undang</i> k) <i>Laporan Kemalangan</i> l) <i>Laporan Pemeriksaan Tempat Kerja</i> <p>The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the estates. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein.</p> <table border="1" data-bbox="1093 997 1832 1233"> <thead> <tr> <th>No</th> <th>Emergency Response Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Physical injury</td> </tr> <tr> <td>2</td> <td>Chemical spillage store, field</td> </tr> <tr> <td>3</td> <td>Tractor accident</td> </tr> <tr> <td>4</td> <td>Fire outbreak</td> </tr> <tr> <td>5</td> <td>diesel, lubricant spillage</td> </tr> <tr> <td>6</td> <td>Fire in field</td> </tr> </tbody> </table> <p>ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified</p>	No	Emergency Response Plan	1	Physical injury	2	Chemical spillage store, field	3	Tractor accident	4	Fire outbreak	5	diesel, lubricant spillage	6	Fire in field	
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Criterion / Indicator	Assessment Findings	Compliance																																																				
	<p>organisation who can demonstrate their suitability to provide training. Among others the training (PTE) held are as follows;</p> <table border="1" data-bbox="1079 544 1839 756"> <thead> <tr> <th>No</th> <th>Emergency Response Plan</th> <th>Training</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>First Aid Box</td> <td>30/10/18</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>Fire drill line site</td> <td>12/11/18</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>Fire in field</td> <td>15/11/18</td> <td>14</td> </tr> <tr> <td>4</td> <td>Safety in workshop</td> <td>14/11/18</td> <td>2</td> </tr> <tr> <td>5</td> <td>Chemical spraying</td> <td>25/10/18</td> <td>7</td> </tr> </tbody> </table> <p>Other details for other estates for the ERP training is shown in 4.4.6.3. The trained personnel for the First Aid were among the employees working as staff/mandores. The first aid boxes were available at various points in the estates complex including office, workshop, sprayers washing facilities etc. Records of accidents are maintained and summarized in JKKP 8. The accidents incidence in 2017 recorded in the estates as shown below:</p> <table border="1" data-bbox="1050 1046 1774 1182"> <thead> <tr> <th rowspan="2">1</th> <th colspan="4">Pamol Timur Estate</th> </tr> <tr> <th>No of cases</th> <th>LTI</th> <th>No of cases</th> <th>Without LTI</th> </tr> </thead> <tbody> <tr> <td></td> <td>28</td> <td>192</td> <td>4</td> <td>-</td> </tr> </tbody> </table> <table border="1" data-bbox="1050 1214 1774 1350"> <thead> <tr> <th rowspan="2">2</th> <th colspan="4">Pamol Barat Estate</th> </tr> <tr> <th>No of cases</th> <th>LTI</th> <th>No of cases</th> <th>Without LTI</th> </tr> </thead> <tbody> <tr> <td></td> <td>13</td> <td>43</td> <td>12</td> <td>-.</td> </tr> </tbody> </table>	No	Emergency Response Plan	Training	Attendees	1	First Aid Box	30/10/18	Entire	2	Fire drill line site	12/11/18	Entire	3	Fire in field	15/11/18	14	4	Safety in workshop	14/11/18	2	5	Chemical spraying	25/10/18	7	1	Pamol Timur Estate				No of cases	LTI	No of cases	Without LTI		28	192	4	-	2	Pamol Barat Estate				No of cases	LTI	No of cases	Without LTI		13	43	12	-.	
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Criterion / Indicator		Assessment Findings				Compliance
		3	Unijaya Estate			
			No of cases	LTI	No of cases	Without LTI
			24	141	2	-
All cases of more than 4 days are investigated. The committee reviewed the HIRARC and change if necessary.						
Criterion 4.4.5: Employment conditions						
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p> <p>Under Human Rights and Workplace, management will respect and uphold the rights of all workers, including contract, temporary and migrant workers, in accordance with the Universal Declaration of Human Rights, the International Labor Organization's core conventions, United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labor in Palm Oil Production.</p>				Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p> <p>Under Human rights and Workplace, management will provide fair and equal employment opportunities for all employees, regardless of race, nationality, religion or gender.</p> <p>Based on the site visit, there is no discrimination occur within foreign workers and locals as well for the job given.</p>				Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>There is 204 workers in Pamol Timur Estate (locals: 26, Indonesian: 54, Bangladeshi: 52, Indian: 18, Nepalese: 54), 126 workers in Unijaya Estate (locals: 7, Bangladeshi: 20, Indonesian: 62, Indian: 30 and Nepalese: 7) and 214 workers in Pamol Barat Estate (locals: 12, Bangladeshi: 25, Indonesian: 95, Indian: 75, Nepalese: 5 and contractors: 2). Sampled below workers' pay slips and contracts:</p> <ol style="list-style-type: none"> 1. Employee Id: PTE0049 – Pamol Timur Estate. 2. Employee Id: PTE0150 – Pamol Timur Estate. 3. Employee Id: PTE3109 – Pamol Timur Estate. 4. Employee Id: AU357663 (Contract) – Pamol Timur Estate. 5. Employee Id: AT944916 (Contract) – Pamol Timur Estate. 6. Employee Id: PTE5151 – Pamol Timur Estate. 7. Employee Id: PTE3128 – Pamol Timur Estate. 8. Employee Id: UJE1008 – Unijaya Estate 9. Employee Id: UJE0852 – Unijaya Estate 10. Employee Id: UJE1012 – Unijaya Estate 11. Employee Id: UJE1031 – Unijaya Estate 12. Employee Id: UJE0766 – Unijaya Estate 13. Employee Id: PBE1022 – Pamol Barat Estate 14. Employee Id: PBE2792 – Pamol Barat Estate 15. Employee Id: PBE2948 – Pamol Barat Estate 16. Employee Id: PBE2676 – Pamol Barat Estate 17. Employee Id: PBE2882 – Pamol Barat Estate 	Complied
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>There are contractor workers in Pamol Timur Estate and Pamol Barat Estate.</p> <p>Sampled below workers has the pay slips:</p> <ol style="list-style-type: none"> 1. Employee Id: PTE0049 – Pamol Timur Estate. 2. Employee Id: PTE0150 – Pamol Timur Estate. 3. Employee Id: PTE3109 – Pamol Timur Estate. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		4. Employee Id: AU357663 (Contract) – Pamol Timur Estate. 5. Employee Id: AT944916 (Contract) – Pamol Timur Estate. 6. Employee Id: PTE5151 – Pamol Timur Estate. 7. Employee Id: PTE3128 – Pamol Timur Estate. 8. Employee Id: UJE1008 – Unijaya Estate 9. Employee Id: UJE0852 – Unijaya Estate	
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The overtime recorded in the manually in overtime requisition form with full name, month, division, work description, hours & time. The overtime records then transferred to the PINFOSYS Check roll Daily Record. Sampled workers is as per 4.4.5.3.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>Employment contracts are available and still valid during the audit, It is evident that the contract is also signed by both parties. Sampled workers is as per 4.4.5.3.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>The overtime recorded in the manually in overtime requisition form or book with full name, month, division, work description, hours & time. The overtime records then transferred to the PINFOSYS Check roll Daily Record. Sampled workers is as per 4.4.5.3.</p>	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed</p>	<p>The working hours and breaks are clearly mentioned in the employment contracts as below: Basic wage: RM 38.46/day</p>	Complied

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	and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	Overtime: Maximum 4 hours/day @ RM 7.21/hour Working Hours: 8 hours/day. Working days: 6 days/week Rest day: one day/week (will be determined by the Employer).	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime in the pay slips adhered to the minimum wage order 2016 which is RM 1000/month or RM38.46/day.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	Management has provided the free medical service, free house, subsidize electric rate of RM 5.00/people. Apart from that, there were other social benefits provided such as: <ol style="list-style-type: none"> 1. VLP (Vacation Leave Pay) in year-end salary for all business units. 2. Annual Prayers (Muslim, Buddhist, Hindu and Cristian) combined with Pamol Kluang POM (Jan 2018). 3. Family Day (21.04.2018 for Pamol Timur Estate and 12.05.2018 for Pamol Barat Estate). 4. Labour Welfare Expenses (Distribute chicken for Raya Celebration) on Aug 2018, Invoice: 18818 Barat Poultry Farm Sdn Bhd: Purchase of Chicken-Hari Raya RM 240.00 at Unijaya Estate. 5. School children transport from linesite to SMK Sri Sembrong (RM16/month/child) for Pamol Timur Estate. 	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards	During site visit, sighted the linesite area are in good condition as per linesite inspection recorded by Hospital Assistant. Clean water is provided from SAJ with subsidize rate of RM 7.70 while electricity is provided with subsidize rate of RM 5.00 by TNB. In Unijaya	Complied

Criterion / Indicator		Assessment Findings	Compliance
	Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	Estate, the treated water is used and sighted the water analysis result conducted by ENV Consultancy & Monitoring Services Sdn Bhd, project ref: ENV/WATER/UNIJAYA/046 dated May 2018. Water samples were taken in point 1 (labor quarters) and point 2 (reservoir) on 9 April 2018 and the result stated no <i>e coli</i> or total coliform present. ENVICHEM is having the accreditation from DSM. There were free medical service from clinic in each operating unit and free child care centre (Creche) for workers children below 4 years in Pamol Timur Estate.	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	There is Policy on Harassment at Workplace signed by NB Sudhakaran, Plantation Director in June 2018 mention the grievance channel such as grievance hotline, employee consultative committee, joint consultative committee, gender consultative committee, via email or by post. Apart from that, management also established the Gender Committee Team and sighted the minutes of meeting in 2x/year (26.09.2018 and 28.03.2018) for Pamol Timur Estate (28.09.2018 and 30.03.2018) for Unijaya Estate and for Pamol Barat Estate (30.06.2018 and tentatively 30.11.2018).	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and	IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018. Under Human rights and Workplace, management will uphold the right to freedom of association and recognize the right to collective bargaining and allow trade unions to have access to our workers.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>Pamol Timur Estate has conducted the Mesyuarat Jawatankuasa Perundingan Pekerja (Joint Consultative Committee/JCC) in 2 months once basis. Sighted the minute meeting on:</p> <ol style="list-style-type: none"> 1. Pamol Timur Estate: 26.10.2018 attended by 11 people, 24.08.2018 attended by 11 people, 27.06.2018 attended by 14 people, 27.04.2018 attended by 11 people and 09.02.2018 attended by 14 people. 2. Unijaya Estate: 26.10.2018 attended by 14 people, 28.08.2018 attended by 14 people, 28.06.2018 attended by 13 people, 25.04.2018 attended by 13 people, 28.02.2018 attended by 15 people. 3. Pamol Barat Estate: 26.10.2018 attended by 15 people, 29.08.2018 attended by 13 people, 27.06.2018 attended by 15 people, 13.04.2018 attended by 12 people and 23.02.2018 attended by 13 people. 	
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p> <p>Under Human rights and Workplace, management will eliminate all forms of illegal, forced, bonded, compulsory or child labor and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries.</p> <p>Based on the workers master list, there is no child labour hired.</p>	Complied
Criterion 4.4.6: Training and competency			

Criterion / Indicator		Assessment Findings	Compliance
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>All employees and contractors /vendors were provided with training by the management. The training among other covers all aspects of the MSPO/RSPO requirements. There were also additional subjects including the estates operating procedures, parameters of FFB qualities vehicles maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The subjects for the training are issued and assisted by the Sustainability Unit. The following topics included in the annual training program 2018/19 among others are extracted below;</p> <ol style="list-style-type: none"> 1) OSH Act & regulations 1994. 2) Environmental Quality Act 1974 3) Induction Program for new workers. 4) OSH Committee and function. 5) First Aid Training 6) Scheduled waste training 7) RSPO/MSPO/ISCC Principles 8) HCV & Biodiversity training. 9) Mechanical/electrical workshop 10) Process activities SOP 11) Supply chain <p>Records of training were sighted during this audit. Details are shown in 4.4.6.3</p>	Complied
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job</p>	<p>The training needs for the mill financial year 2018/19 training program has been established. The details of the training needs include categories of stations, subjects, and employees' group. Included in this program among others are subjects related to;</p> <ol style="list-style-type: none"> 1) Environmental/safety & health policy 	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																
	description. - Major compliance -	2) Scheduled waste management / environmental responsibility, 3) Building and structure 4) Sustainability 5) Good agricultural practices–estates operations/control of parameters 6) Social program/welfare activities.																																																	
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	Training details are planned and summarised in the Safety And Health Program 2018 and the Sustainability Program. Training program are made on annual basis. In addition it is subject for a review during the financial year should need arises. These training are made to ensure employees are trained in their job and on to update on current development adopted by the organisation. a) Pamol Timur Estate <table border="1" data-bbox="1064 997 1854 1401"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>13/11/18</td><td>Critical point control</td><td>12</td></tr> <tr><td>2</td><td>30/8/18</td><td>IPM Guidelines</td><td>9</td></tr> <tr><td>3</td><td>5/9/18</td><td>IPM implementation – Barn Owl</td><td>4</td></tr> <tr><td>4</td><td>1/10/18</td><td>Road maintenance</td><td>10</td></tr> <tr><td>5</td><td>4/9/18</td><td>Water quality index</td><td>8</td></tr> <tr><td>6</td><td>29/9/18</td><td>FFB Loading Tractor</td><td>5</td></tr> <tr><td>7</td><td>29/9/18</td><td>Tractor driving</td><td>5</td></tr> <tr><td>8</td><td>29/9/18</td><td>Induction program for new FW</td><td>5</td></tr> <tr><td>9</td><td>19/9/18</td><td>Manuring, PPE, SDS, First Aid</td><td>13</td></tr> <tr><td>10</td><td>19/9/18</td><td>Spraying safety procedures</td><td>12</td></tr> <tr><td>11</td><td>13/9/18</td><td>Buffalo handling</td><td>20</td></tr> </tbody> </table>	No	Date	Subject	Attendees	1	13/11/18	Critical point control	12	2	30/8/18	IPM Guidelines	9	3	5/9/18	IPM implementation – Barn Owl	4	4	1/10/18	Road maintenance	10	5	4/9/18	Water quality index	8	6	29/9/18	FFB Loading Tractor	5	7	29/9/18	Tractor driving	5	8	29/9/18	Induction program for new FW	5	9	19/9/18	Manuring, PPE, SDS, First Aid	13	10	19/9/18	Spraying safety procedures	12	11	13/9/18	Buffalo handling	20	Complied
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Criterion / Indicator		Assessment Findings				Compliance			
		12	8/7/18	Motorcycle riding	20				
		13	13/9/18	Harvesting SOP	20				
		14	7/9/18	<i>Tingkah laku semasa bekerja</i>	19				
		15	7/9/18	Tractor driving	6				
		16	29/8/18	Workshop operations	3				
		17	20/3/18	PPE Adherence	10				
		18	24/7/18	ERP – Bees/Snake	Entire				
		19	24/7/18	Chemical spraying	24				
		20	18/7/18	Fertiliser application	10				
		21	2/7/18	Rat baiting	7				
		22	30/10/18	First aid box briefing	Entire				
		23	27/10/18	Chemical mixing	1				
		24	16/11/18	VLP understanding	Entire				
		25	14/9/18	Sexual harassment /rights/gender	Entire				
		26	20/8/18	Grievance /complaint procedures	entire				
		27	1/8/18	Water management & conservation	8				
		28	18/5/18	Contractors awareness on RSPO/MSPO/ISCC	6				
		29	23/1/18	MSPO Awareness employees	Entire				
		30	10/9/18	Induction Program new FW	4				
		b) Unijaya Estate							
				No	Date		Subject	Attendees	
				1	14/11/18		SOP -Spraying SDS, PPE, first Aid	7	
				2	17/11/18		SOP – Tractor driving	7	

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		3	16/11/18	<i>Tingkah laku semasa berkerja</i>	10	
		4	16/11/18	Workshop operation - Safety	2	
		5	16/11/18	Harvesting SOP	29	
		6	28/8/18	First Aid By MA	10	
		7	24/10/18	ERP – Fire, first aid, ERT	Entire	
		8	28/8/18	ESH , Accident investigation	40	
		9	29/8/8	SW Management	40	
		10	23/8/18	Highly toxic pesticides	12	
		11	18/8/18	Rat baiting	8	
		12	23/7/18	Office operations SOP	11	
		13	5/5/18	Working at height	1	
		14	3/58/1	Manuring SOP	7	
		15	25/4/18	Safety Campaign	Entire	
		16	17/4/18	PPE adherence	9	
		17	26/3/18	Chemical mixing	1	
		18	22/2/18	Harvesting SOP	19	
		19	24/3/18	Open Burning Policy	6	
		20	10/1/18	Highly toxic pesticides - SOP	17	
		21	23/11/18	Induction program new FW	4	
		22	31/10/18	VLP/grievance /pay slips briefing	Entire	
		23	22/11/18	Company Policy briefing	Entire	
		24	9/2/18	Buffer zone -manurer/sprayer	20	
		25	30/8/18	Oil trap maintenance	10	
		26	10/8/18	Waste segregation	2	
		27	17/8/18	HCV protection	entire	
		28	23/11/18	Wild life training	entire	
		29	23/1/18	Sustainability, MSPO Supply chain	28	

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Criterion / Indicator		Assessment Findings				Compliance		
		30	17/8/18	IPM beneficial plant, barn owl	entire			
		31	12/8/18	Road maintenance	8			
		c) Pamol Barat Estate.						
				No	Date		Subject	Attendees
		1	19/11/18	SOP SDS, Manuring, PPE, First Aid			20	
		2	28/6/18	SOP Chemical spraying			31	
		3	26/11/18	Tingkah laku semasa bekerja			4	
		4	14/11/18	Manuring			10	
		5	21/11/18	SDS Briefing			31	
		6	3/11/8	SOP - Contractors			11	
		7	17/11/18	SW management			2	
		8	14/11/18	SOP – chemical mixing			1	
		9	14/11/18	SOP -Empty containers			1	
		10	7/11/18	Chemical storage			1	
		11	8/11/18	SOP – harvesting			12	
		12	8/11/18	Buffalo cart management			33	
		13	26/10/18	Tractor driving			13	
		14	27/8/18	SOP Harvesting			22	
		15	19/8/18	Fire drill ERP			Entire	
		16	1/8/18	First aid box			entire	
17	29/9/18	Contractors – sustainability		3				
18	14/9/18	Sexual harassment		5				
19	12/6/18	Grievance procedure		entire				
20	25/1/18	IPM Management		entire				

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Criterion / Indicator		Assessment Findings				Compliance
		21	5/1/18	Chemical protection at buffer zone	entire	
		22	29/9/18	HCV Protection	entire	
		23	25/10/18	Water quality index	8	
		24	4/16/18	Wild life protection	entire	
		25	13/10/18	Waste segregation	entire	
		26	27/9/18	Oil trap maintenance	4	
		27	9/7/18	Pay slip understanding	entire	
		28	16/7/18	Policies briefing	Entire	
		29	26/11/18	Induction program FW	4	
		30	16/11/8	Induction program FW	8	
		31	31/10/18	Induction program FW	10	
		32	25/10/18	Road maintenance	8	
		Bulk of the estates is training is organized during the morning muster prior to work commencement. Mainly the issues discussed / briefed were related to estates operations and safety compliance.				
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services						
Criterion 4.5.1: Environmental Management Plan						
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	The policy in relation to environmental is stated in the IOI Group – Sustainable Palm Oil Policy with the latest revision made in March 2018. The Policy is signed by The Group Chief Executive Officer.				Complied
4.5.1.2	The environmental management plan shall cover the following:	The policy in relation to environmental is stated in the IOI Group – Sustainable Palm Oil Policy latest revised dated March 2018 signed by				Complied

Criterion / Indicator		Assessment Findings	Compliance
	a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	<p>Group Chief Executive Officer. Among others the Policy emphasized on the Environmental Management to include the following;</p> <ol style="list-style-type: none"> 1) Identification & protection of HCV And HCS forest 2) Implementation of program to progressively reduce GHG emission, recycle /reuse of palm biomass 3) Enforcement of IOI no burning policy. 4) No use of paraquat and pesticides categorized by WHO class 1A or 1B. <p>The aspects and impact for the estates were established in a similar documents prepared by the Sustainability team. Details as follows; Pamol Timur/Unijaya/Pamol Barat Estates for a period Nov 2015 – Oct 2020</p> <ol style="list-style-type: none"> i. prepared 10/11/15 ii. Ist review 20/11/16 iii. 2nd review 20/11/17 iv. 3rd review 14/11/18 <p>Therein the content providing details relating to;</p> <ol style="list-style-type: none"> a) Waste management and reduction plan b) Pesticide reduction plan c) Chemical & fertilizer reduction plan d) Aspects and impacts identification & risk assessment matrix e) Environmental pollution and GHG management plan. f) Future continuous improvement plan. 	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.	All the estates documented a similar environmental improvement plan being having similar operations and work method throughout the region. The continual improvements plans are aimed to;	Complied

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Criterion / Indicator		Assessment Findings	Compliance																		
	- Major compliance -	<p>a) prevent and reduce pollutant, b) prevent and reduce waste products release c) reduce chemicals comprising pesticides or fertilizer.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Sources/objective & target</th> <th>Action steps</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Synergy support and planning between mill and estates</td> <td>A synergistic support and planning of the EFB and dried POME from the mill to the estates.</td> </tr> <tr> <td>2</td> <td>Management of biodiversity river reserve & buffer zone conservation</td> <td>To train/retrain sprayers/manuring gang to avoid any chemical-related works at such areas</td> </tr> <tr> <td>3</td> <td>To monitor waste management plan for its suitability</td> <td>SW & domestic waste disposal monitoring. Changes of internal disposal site to the local municipal.</td> </tr> <tr> <td>4</td> <td>To improve employees awareness on pollution prevention at housing complex including zero burning policy.</td> <td>Continuous reminders and enforcement</td> </tr> <tr> <td>5</td> <td>To minimise spillage of oil/chemical onto the ground</td> <td>Continuous training and use of spill trays</td> </tr> </tbody> </table>	No	Sources/objective & target	Action steps	1	Synergy support and planning between mill and estates	A synergistic support and planning of the EFB and dried POME from the mill to the estates.	2	Management of biodiversity river reserve & buffer zone conservation	To train/retrain sprayers/manuring gang to avoid any chemical-related works at such areas	3	To monitor waste management plan for its suitability	SW & domestic waste disposal monitoring. Changes of internal disposal site to the local municipal.	4	To improve employees awareness on pollution prevention at housing complex including zero burning policy.	Continuous reminders and enforcement	5	To minimise spillage of oil/chemical onto the ground	Continuous training and use of spill trays	
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Criterion / Indicator		Assessment Findings			Compliance
		6	To review aspect identification & impact evaluation to identify significant critical points for control.	Review through EIA. Guidance also sourced from the chemical MSDS/CSDS.	
		7	Soil erosion prevention plans	Using palm trunk chip as part of ground mulch Planting of LCC for the ground covers No bare ground condition.	
The monitoring is made through the daily supervision and visits by the higher management.					
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The improvement plans were sighted. The estates identified the following activities and areas for Improvement plan;			Complied
		No	Activity	Areas of activity / Plan	
		1	Reduce water usage	washing bay, mixing chemical bay. Consumption of water is measured by mtl/mt FFB	
		2	Reduce diesel usage	through SOP of PMV (planned maintenance vehicle). FFB collection using buffalo system.	

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Criterion / Indicator		Assessment Findings		Compliance																				
		3	Reduce herbicide & pesticide usage Initiative made through <i>nephrolepis</i> establishment, LCC establishment and growth of beneficial plant. Biological control using barn owl system. Grass cutting at path for the field upkeep. Application of EFB and stacked fronds to suppress weeds growth and enhance moisture.																					
		Monitoring is made through data analysis and the daily field supervision																						
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	This is available in the annual training program under subject of:		Complied																				
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		Details of the training held as shown in 4.4.6.3.																						
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are	The is made thorough the EPMC held 4x/year. The dates held to date as recorded below;		Complied																				

Criterion / Indicator		Assessment Findings	Compliance
	discussed. - Major compliance -	<p>The agenda discussed as follows;</p> <ul style="list-style-type: none"> i. SW discussion/EFB disposal/Effluent18, ii. Drainage/GHG/Competent Person. iii. RTE/Zero burning iv. Water management plan. v. Pesticide reduction plan vi. HCV/Land preparation & soil conservation vii. Continuous improvement plans. <p>Unijaya estate had meeting on 28/9/18, 28/6/18, 30/3/18. The other 2 estates had similar meetings. Minutes were sighted and verified.</p>	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>TheThe estates consistently monitor the following and tabulate the data monthly.</p> <p>Direct usage of diesel for the estates operations are recorded. The quantity in mt is divided over the mt FFB produced (ratio) during the month. The performance is measured by this ratio to indicate the level of performance. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel. There were measures as shown in the energy management plan to reduce and eliminate wastages among others as follows;</p> <ul style="list-style-type: none"> i. To ensure minimum balance FFB ramp balance to sustain the desired FFA at the mill. ii. Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages iii. Regular servicing of gen-sets for a better efficiency 	Complied

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Criterion / Indicator		Assessment Findings				Compliance																																				
		Jan	3872	1123	3.45																																					
		Feb	3281	812	4.04																																					
		Mac	2812	973	2.89																																					
		April	3286	1040	3.16																																					
		May	1340	1480	0.91																																					
		June	1581	1613	0.98																																					
		July	2003	2494	0.80																																					
		Aug	1732	2900	0.60																																					
		Sept	1010	3065	0.33																																					
		Oct	1950	2997	0.65																																					
		Nov	1932	2760	0.70																																					
		Dec	1882	2866	0.66																																					
		Total	25481	24129																																						
		<p>The estates recorded a range of 0.33 to 4.04 for the entire year.</p> <p>c) Pamol Barat Estate</p> <table border="1"> <thead> <tr> <th>Month 17</th> <th>Diesel used/L</th> <th>FFB produced /mt</th> <th>Diesel/FF B</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>2410</td> <td>1863</td> <td>1.29</td> </tr> <tr> <td>Feb</td> <td>2590</td> <td>1787</td> <td>1.45</td> </tr> <tr> <td>Mac</td> <td>2000</td> <td>1786</td> <td>1.12</td> </tr> <tr> <td>April</td> <td>2150</td> <td>2269</td> <td>0.95</td> </tr> <tr> <td>May</td> <td>1750</td> <td>2474</td> <td>0.71</td> </tr> <tr> <td>June</td> <td>1850</td> <td>2500</td> <td>0.74</td> </tr> <tr> <td>July</td> <td>2250</td> <td>2881</td> <td>0.78</td> </tr> <tr> <td>Aug</td> <td>2520</td> <td>3315</td> <td>0.76</td> </tr> </tbody> </table>				Month 17	Diesel used/L	FFB produced /mt	Diesel/FF B	Jan	2410	1863	1.29	Feb	2590	1787	1.45	Mac	2000	1786	1.12	April	2150	2269	0.95	May	1750	2474	0.71	June	1850	2500	0.74	July	2250	2881	0.78	Aug	2520	3315	0.76	
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Criterion / Indicator		Assessment Findings				Compliance
		Sept	2700	3334	0.81	
		Oct	2650	2870	0.92	
		Nov	2750	2532	1.09	
		Dec	2970	2532	1.17	
		Total	28590	30143	0.95	
		The estates recorded a range of 0.33 to 4.04 for the entire year.				
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Consumption of electricity is also recorded mainly reading from the meters. Diesel utilisation is recorded at ratio vs the mt FFB. Graph is tabulated to see the trend of performance. The annual diesel and electricity estimates is provided in the annual budget.</p>				Complied
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>There is no opportunity for the estates to capitalize the utilization of fibre/shell as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>				Complied
Criterion 4.5.3: Waste management and disposal						

Criterion / Indicator		Assessment Findings	Compliance																				
<p>4.5.3.1</p> <p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>All waste and pollution are identified and documented in the Waste Management Plan 2018/19. The waste and pollution generated from the estates operations as shown below;</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>No</th> <th>List of waste and pollutant</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Spent hydraulic & lubricants oil</td> </tr> <tr> <td>2</td> <td>Spent contaminated rags, oil filters, oil containers</td> </tr> <tr> <td>5</td> <td>Oil & grease</td> </tr> <tr> <td>8</td> <td>Domestic waste</td> </tr> <tr> <td>9</td> <td>Chemical waste & chemical containers</td> </tr> <tr> <td>10</td> <td>Spent batteries</td> </tr> <tr> <td>11</td> <td>Scrap metal and bald tyres</td> </tr> <tr> <td>12</td> <td>Sewage</td> </tr> <tr> <td>13</td> <td>Clinical wastes</td> </tr> </tbody> </table>		No	List of waste and pollutant	1	Spent hydraulic & lubricants oil	2	Spent contaminated rags, oil filters, oil containers	5	Oil & grease	8	Domestic waste	9	Chemical waste & chemical containers	10	Spent batteries	11	Scrap metal and bald tyres	12	Sewage	13	Clinical wastes	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance																							
<p>4.5.3.2</p> <p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>The details of the waste management plan is described below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Description</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Industrial waste</td> <td>Fertiliser bags</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor</td> </tr> <tr> <td>Scrap metal</td> <td>Inventory maintained, tender at zone level for sale to licensed contractor.</td> </tr> <tr> <td>POME</td> <td>Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.</td> </tr> <tr> <td>3</td> <td>Sewage waste</td> <td>sewage</td> <td>To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management.</td> </tr> <tr> <td>4</td> <td>Scheduled Waste</td> <td>SW 404 Clinical waste</td> <td>Inventory maintained. Storage in sharp bin in clinic. Disposal to</td> </tr> </tbody> </table>				No	Type of waste	Description	Action to be taken	1	Domestic waste	Rubbish	Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site	2	Industrial waste	Fertiliser bags	Inventory of bags, reuse for LF collection, sell to appointed contractor	Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.	POME	Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.	3	Sewage waste	sewage	To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management.	4	Scheduled Waste	SW 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal to	Complied
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Criterion / Indicator		Assessment Findings				Compliance	
					Kualiti Alam Waste Management (licensed contractor) /VMO clinic. SW rags, plastics, filters Spent lubricant & hydraulic oil Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Inventory maintained. Storage in scheduled waste store. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE Collection by licensed vendor. Inventory maintained. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE	
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. - Major compliance -	The SOP for SW has been established and documented in <i>SOP Ref no IOI-OSH 3.2.2</i> dated 12/3/18 compiled in the Group Standard Operating Procedures for the estates. Therein describing details relating to; <ul style="list-style-type: none"> • Labeling • Legal requirement • Waste generator 				Complied	

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Training required • DOE license <p>Despatch by Unijaya Estate was made on 03/10/18 for the following scheduled waste. SW 409 (0.273 mt), SW410 (0.081mt) and SW305 (0.042 mt).</p> <p>Pamol Barat Estate had a dispatch on 4/10/18 for SW409 (0.9838mt) SW 109 (0.020 MT) & SW 305 (0.190 MT).</p>	
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>Under the operational control procedure established as given in 4.5.3.3 above the guidelines and practices for handling empty pesticides are as follows;</p> <ol style="list-style-type: none"> All class 2 and above containers are tripled rinsed and hole punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. Containers to be disposed as scheduled waste need not go the triple rinsing. Disposal made to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE. Relevant documents sighted with the latest despatch made on 24/9/18 for SW 305/306/409. Consignment note no OPC 16778. <p>These guidelines are based on Department Of Agriculture ref 91/120/038/014 dated 7/11/2002</p>	Complied
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>Under the action plan of the waste plan, and collection is 2x-3x/week by estate management. Recycled waste is separated while the domestic wastes are accumulated in a bin for further collection by M/s</p>	Complied

Criterion / Indicator		Assessment Findings				Compliance																				
		Mido Sdn Bhd . Monitoring is made by an Executive/staff. The estate also manages the site of the mill domestic disposal.																								
Criterion 4.5.4: Reduction of pollution and emission																										
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>The details of the waste management plan is described below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Description</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Industrial waste</td> <td>Fertiliser bags</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor</td> </tr> <tr> <td>Scrap metal</td> <td>Inventory maintained, tender at zone level for sale to licensed contractor.</td> </tr> <tr> <td>POME</td> <td>Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.</td> </tr> <tr> <td>3</td> <td>Sewage waste</td> <td>sewage</td> <td>To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management.</td> </tr> </tbody> </table>				No	Type of waste	Description	Action to be taken	1	Domestic waste	Rubbish	Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site	2	Industrial waste	Fertiliser bags	Inventory of bags, reuse for LF collection, sell to appointed contractor	Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.	POME	Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.	3	Sewage waste	sewage	To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management.	Complied
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Criterion / Indicator		Assessment Findings				Compliance
		4	Scheduled Waste	SW 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal to Kualiti Alam Waste Management (licensed contractor) /VMO clinic.	
				SW rags, plastics, filters	Inventory maintained. Storage in scheduled waste store. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE	
				Spent lubricant & hydraulic oil	Collection by licensed vendor. Inventory maintained. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE	
				Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW	Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Details as provided in 4.5.4.2 above.				Complied

Criterion / Indicator	Assessment Findings	Compliance												
Criterion 4.5.5: Natural water resources														
<p>4.5.5.1 The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<p>The Water Management Plan 2018/19 for the estates has been established. This is compiled on Group basis and amended to meet demands of specific issue in Operating Units. Included therein are the following documents which were sighted and verified; Contingency plan during water shortage:</p> <table border="1" data-bbox="1050 678 1868 1061"> <thead> <tr> <th>No</th> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water shortage/ prolonged dry season</td> <td>to obtain water from nearby source of water course to train/educate staff/workers to conserve water to seek assistance from SAJ - to obtain treated water supply from mill's WTP</td> <td>Estate Asst.</td> </tr> <tr> <td>2</td> <td>Severe water pollution/ contamination</td> <td>to train/educate staff/workers to conserve water to seek assistance from SAJ - to obtain treated water supply from mill's WTP</td> <td>Estate Asst.</td> </tr> </tbody> </table> <p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Maintenance Of Riparian Reserve ref no 16.1 dated 20/12/11. The buffer zones established are as following:</p>	No	Area/incident	Action steps	PIC	1	Water shortage/ prolonged dry season	to obtain water from nearby source of water course to train/educate staff/workers to conserve water to seek assistance from SAJ - to obtain treated water supply from mill's WTP	Estate Asst.	2	Severe water pollution/ contamination	to train/educate staff/workers to conserve water to seek assistance from SAJ - to obtain treated water supply from mill's WTP	Estate Asst.	
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Criterion / Indicator		Assessment Findings		Compliance												
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4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	The estates comply to this requirement. This requirement is also audited internally by the Sustainability Unit. During the field visit no construction of such obstruction was observed. There is no major river flowing in all the estates audited.		Complied												
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	During the site visit practices of water harvesting are noted as available in the SOP. Road side pits were available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. Amendments of intervals of this construction are made to suit the infrastructure /terrain of estate.		Complied												
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value																
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN))	An assessment on RTE on 21/11/15 and reviewed on 4/3/18. Therein describing details relating to; a) Objectives <ul style="list-style-type: none"> - To identify RTE species surrounding the estate. - To identify the status of species identified - To develop action plan to maintain/enhance the species - Educate workforce - To ensure no individual capture 		Complied												

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Criterion / Indicator		Assessment Findings	Compliance
	<p>status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<ul style="list-style-type: none"> b) Protection of wildlife Act 1972/wildlife conservation Act 2010. c) List of important bird areas IBAs for Malaysia d) Protection Animals and others under wildlife protection act 1972 (fauna) e) Protected mammals/aquatic/protected animals/protected birds f) Statement of commitment g) Action plan for monitoring RTE within and surrounding estate compound h) Mechanism for monitoring and reviewing outcomes of monitoring i) Contact no of local authorities. 	
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> d) Ensuring that any legal requirements relating to the protection of the species are met. e) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <p>- Major compliance -</p>	<p>This has been elaborated in 4.5.6.2 above. Signboards and training are also displayed and provided to the employees on such a requirement. Training in relation to RTE is shown in 4.4.6.3</p>	Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>A monitoring checklist maintained by the AP during their rounds in the fields. In addition, the supervisory personnel are also given task to inform the management of any sighting of RTE in the property. This is recorded in the RTE species recording. Document was sighted and verified. The formatting for monitoring and maintaining RTE as formatted under Action plan, monitoring & continuous improvement</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		program, documents to be reviewed, management reviews comments & time bound and the Person in charge	
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	The Group policy of "Zero Burning Policy" is enforced ever since the industry practiced such a ruling. The Policy was last reviewed on May 2018 and signed by The Plantation Director. Among others the Policy stated the following commitment; <ul style="list-style-type: none"> a) Commitment towards zero burning practices across the estates as part of effort in protecting the environment and combating haze problem. b) Open burning is defined as any fire , combustion or smoldering that occurs in the open air and as by law, no person shall cause or allow open burning on any premises and subjected to legal action. c) IOI will provide training to its workers on fire prevention and techniques to put out fire, and inform the Contractors and smallholders on this Policy The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. This is the measures taken by the organization to pledge towards zero open burning.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	The management maintained zero open burning and opted for other option in case of potential significant risk of disease spread for the continuation of other crop. Hence this requirement is not used in the estate practices.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	The management maintained zero open burning.	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	This is in practice whenever the estate commences land preparation for its replanting works. Ploughing is not practiced in the Organisation at current.	Yes
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	All the SOP for the estates operations in a document "StOPs For Estates Operations". Therein containing details for all the estates activities among others as listed below; <ul style="list-style-type: none"> a) Seeds production/planting density/nursery b) Land clearing/planting techniques/LCC planting c) Manuring/weeding/pest and disease d) Harvesting & collection e) Road maintenance/buffalo healthcare/ f) Foliar sampling/beneficial plant 	Complied
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of	The estates construct terraces at slope area of more than 6 degree. Planting of cover crop are made to retain the soil structure and conservation. Road side pit are made to divert water at slope areas to prevent road erosion and surface damage. Terraces are constructed inclined towards the terrace wall. Slope of more than 25 degrees are	Complied

Criterion / Indicator		Assessment Findings	Compliance
	either soil, nutrients or chemicals. - Major compliance -	avoided in the planting areas due to the Policy of the Company forecasting several issues during the crop recovery on maturity. This is also to comply along with the RSPO guidelines.	
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signages at the boundary/corners of every field. This is observed during the field visit in the estates.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	All the 3 estates audited possessed a similar budget format. Inclusive there is also a 5-year budget/forecast financial plan 2018/19-2022/23 allocating categories among others; a) Area statement. - Year of planting - Total mature areas - Total immature areas. b) Crop FFB monthly breakdown c) 10 years replanting program d) Summary replanting program by field e) Detail replanting program by field f) Executives/staff/workers requirement g) Mature oil palm costing statement - Upkeep & cultivation - Harvesting & collection h) General charges statement - General charges - Cost of supervision - Cost of labour	Complied

Criterion / Indicator		Assessment Findings	Compliance																														
		<ul style="list-style-type: none"> - Cost of other - Cost of RSPO i) Capital expenditure statement <ul style="list-style-type: none"> - Building, utilities, welfare - Plant & machinery - Office equipment - Furniture & fittings - Electrical installation - New roads & bridges <p>The five years planning horizon 2018/19-2022/23 is available.</p>																															
4.6.2.2	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p>- Major compliance -</p>	<p>All the estates in the Pamol CU maintained records of replanting for a horizon minimum of 5 years. Details as shown below. All figures in ha otherwise stated.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2017/18</th> <th>2018/19</th> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> </tr> </thead> <tbody> <tr> <td>Pamol Timur</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Pamol Barat</td> <td>361</td> <td>233</td> <td>203</td> <td>0</td> <td>0</td> </tr> <tr> <td>Unijaya</td> <td>0</td> <td>0</td> <td>121</td> <td>131</td> <td>0</td> </tr> <tr> <td>Total</td> <td>361</td> <td>233</td> <td>324</td> <td>131</td> <td>0</td> </tr> </tbody> </table>	Estate	2017/18	2018/19	2019/20	2020/21	2021/22	Pamol Timur	0	0	0	0	0	Pamol Barat	361	233	203	0	0	Unijaya	0	0	121	131	0	Total	361	233	324	131	0	Complied
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4.6.2.3	<p>The business or management plan may contain:</p> <p>a) Attention to quality of planting materials and FFB</p>	<p>This requirement i.e. crop material, crop projection, yield, production cost is available. It is provided in the business management plan shown in item 4.6.2.1 above. The estates had a format and guideline to calculate the returns on the field operations i.e. Income=sale of FFB (with award of CPO/CPK from the mill) less the expenditure (fixed and</p>	Complied																														

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Criterion / Indicator		Assessment Findings	Compliance
	b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -	direct cost). The main document is handled by the higher management based in Head Office.	
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed monthly. The supervisory personnel maintained a daily cost for the field operations. The regional meetings involving the Managers sit monthly with the Regional Controller for the performance review.	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pamol Timur Estate send the FFB only to Pamol Kluang POM which is within the group, that's why no payment been made for the products/services.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Pamol Timur Estate send the FFB only to Pamol Kluang POM which is within the group, that's why no payment been made for the products/services.	Complied
Criterion 4.6.4: Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	As per contract agreement no: PTE/005-18/19 for LEE YEE CHENG, (Pamol Timur Estate), the contractor, Ta Czhck Keowg (Unijaya Estate) and Mohd Saein bin Amat (Pamol Barat Estate), under the special conditions, it is agreed that the contractor also requested to oblige to all the requirements of RSPO, MSPO and ISCC.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	<p>Sampled contract agreement no: PTE/005-18/19 for LEE YEE CHENG for transport of EFB from Pamol Mill to estate fields including loading/unloading valid from 01.07.2018 – 30.06.2019. The details of payment from Pamol Timur Estate to distance more/less than 5 km was made clear and signed by both parties on 01.07.2018.</p> <p>In Unijaya Estate, Ta Czhck Keowg for FFB transport-internal, contract no: UJE/003-18/19 valid within 01.07.2018 – 30.06.2019 and signed by both parties.</p> <p>In Pamol Barat Estate, Mohd Saein is hired for transport & manual loading FFB from PBE mill, contract no: PBE/002-18/19 valid within 01.07.2018 – 30.06.2019 and signed by both parties.</p> <p>Sighted the payment voucher; voucher no: 57945 dated 09.11.2018 cheque no: MBB1294894 amount RM 9,604.23 for Lee Yee Cheng (Pamol Timur Estate), voucher no: 59756 dated 05.11.2018 cheque no: MBB/315003 amount RM 4987.26 for Ta Czhck Keowg (Unijaya Estate) and voucher no: 60340 dated 07.11.2018 cheque no: MBB-314367 amount RM 16,112.18 for Mohd Saein bin Amat (Pamol Barat Estate).</p>	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	As per contract agreement no: PTE/005-18/19 for LEE YEE CHENG, (Pamol Timur Estate), the contractor, Ta Czhck Keowg (Unijaya Estate) and Mohd Saein bin Amat (Pamol Barat Estate), under the special	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	conditions, it is agreed that the contractor also requested to oblige to all the requirements of RSPO, MSPO and ISCC.	
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	The management has the summary of job completion after assessing the contractor's progress works for the payment preparation. Sighted the summary of EFB loading tonnage for Oct-18 for LEE YEE CHENG, summary of internal transport (PM90-98) October 2018 for Ta Czhck Keowg and CROR Summary for month of October 2018 for Mohd Saein.	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and	There is no NEW PLANTING for all the visited estates within the CU.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	<p>implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.</p> <p>- Minor compliance -</p>	Hence the criterion is not relevant.	
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	<p>Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.</p> <p>- Major compliance -</p>	<p>There is no NEW PLANTING for all the visited estates within the CU.</p> <p>Hence the criterion is not relevant.</p>	N/A
4.7.4.2	<p>Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.</p> <p>- Major compliance -</p>	<p>There is no NEW PLANTING for all the visited estates within the CU.</p> <p>Hence the criterion is not relevant.</p>	N/A
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	<p>Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws.</p> <p>- Major compliance -</p>	<p>There is no NEW PLANTING for all the visited estates within the CU.</p> <p>Hence the criterion is not relevant.</p>	N/A
4.7.5.2	<p>Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation.</p>	<p>There is no NEW PLANTING for all the visited estates within the CU.</p> <p>Hence the criterion is not relevant.</p>	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment IOI Pamol Kluang Palm Oil Mill Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013 . It is recommended that the certification of IOI Pamol Kluang Palm Oil Mill Certification Unit is approved.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: RAVI TONY	Name: Elzy Ovktafia Chairul
Company name: IOI PLANTATION SERVICES SDN BHD	Company name: BSI Services Malaysia Sdn. Bhd.
Title: MANAGER	Title: Client Manager
Signature:  IOI PLANTATION SERVICES SDN BHD Company No: 1050732-T Sustainability, Safety & Health Dept ----- RAVI TONY MANAGER JKKP IS 127438/2/1596 Date: 24/12/18	Signature:  Date: 22.12.2018

Appendix A: Assessment Plan

Date	Time	Subjects	(EO)	(AB)
Sunday 25.11.2018	-	Audit team traveling to Hotel Anika, Kluang	√	√
Monday 26.11.2018 Pamol Kluang 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). 	√	√
	0900 - 1200	Pamol Kluang 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.	√	√
	1200 - 1300	Lunch	√	√
	1300 - 1630	Pamol Kluang 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	√	√
Tuesday 27.11.2018 Pamol Timur Estate	0830 - 1200	Pamol Timur 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.	-	√
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-
	1200 - 1300	Lunch	√	√
	1300 - 1630	Pamol Timur 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	√	√
Wednesday 28.11.2018 Unijaya Estate	0830 - 1200	Unijaya 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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Date	Time	Subjects	(EO)	(AB)
	1200 - 1300	Lunch	√	√
	1300 - 1630	Unijaya 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 29.11.2018 Pamol Barat Estate	0830 - 1200	Pamol Barat 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.	√	√
	1200 - 1300	Lunch	√	√
	1300 - 1630	Pamol Barat 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	Preparation of Closing Meeting and Closing Meeting	√	√

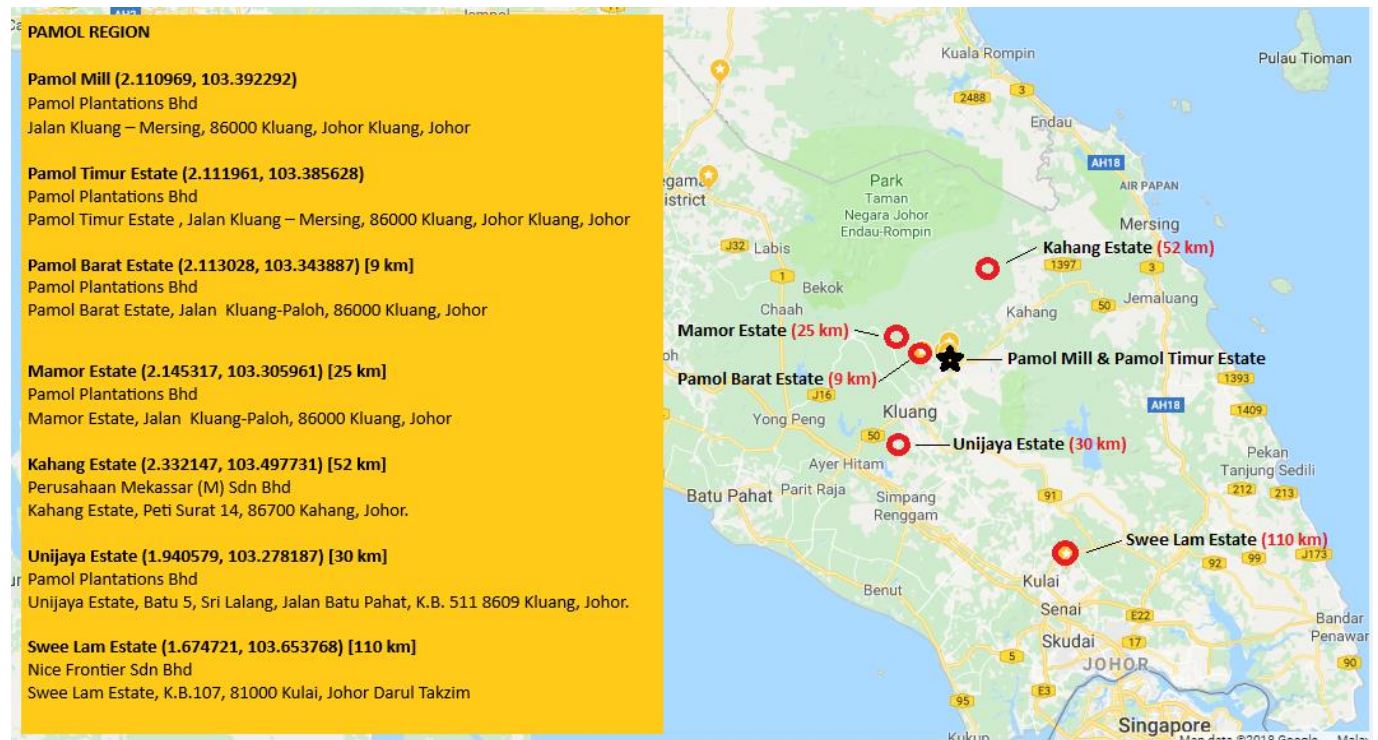
Appendix B: List of Stakeholders Contacted

<p>Government Bodies: SJKC Kampung Gajah Kluang Labour Department Officer (Puan Husna)</p>	<p>Internal Stakeholders: Workers Representatives (Foreign Worker) Gender Committee Representative</p>
<p>Communities: Villagers of Kampung Sri Tambak Neighbour smallholders</p>	<p>Contractors: EFB Contractor</p>

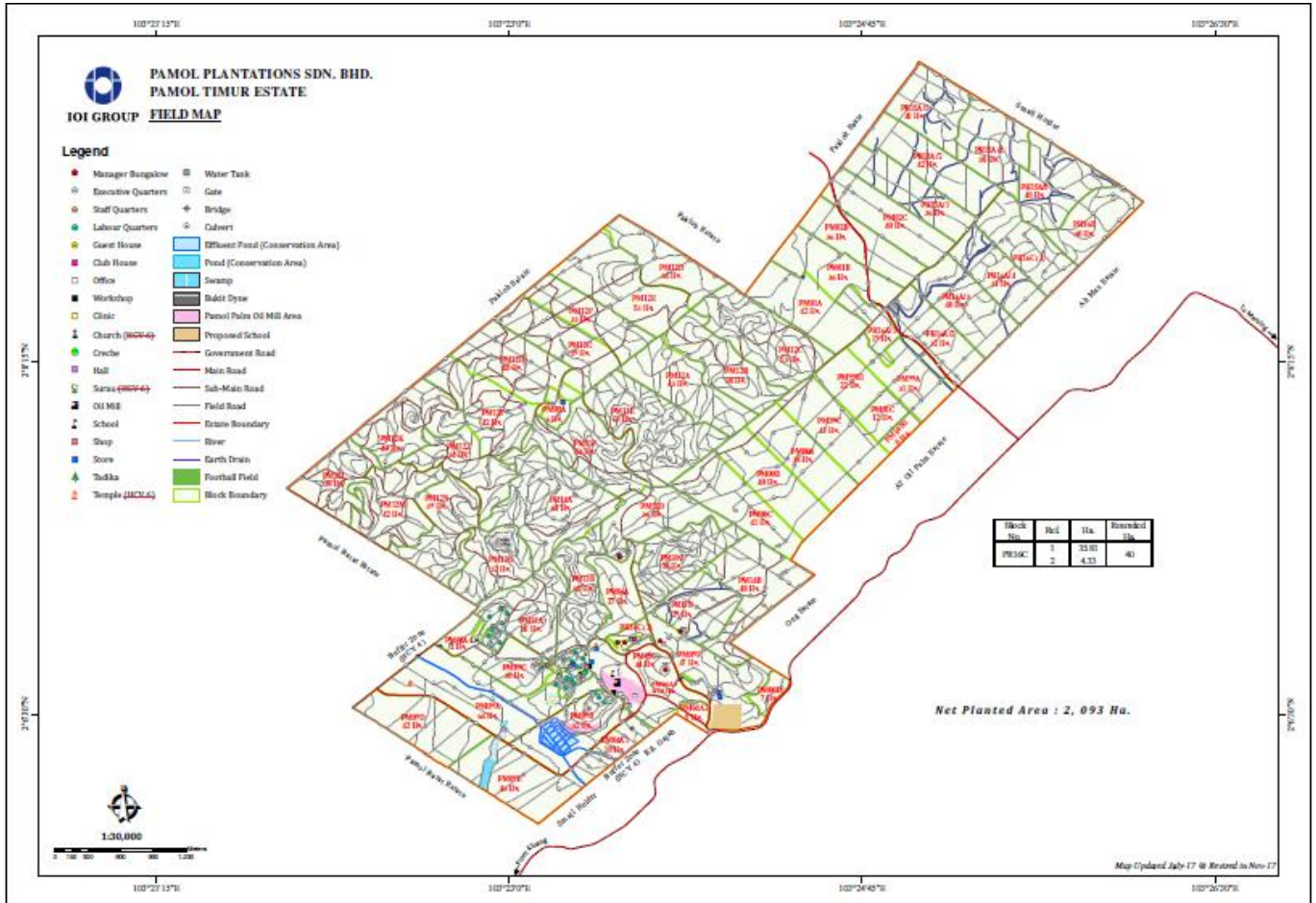
Appendix C: Smallholder Member Details

No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	Not applicable as no smallholder's scheme involved in the scope of certification.			
2				
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23				
TOTAL				

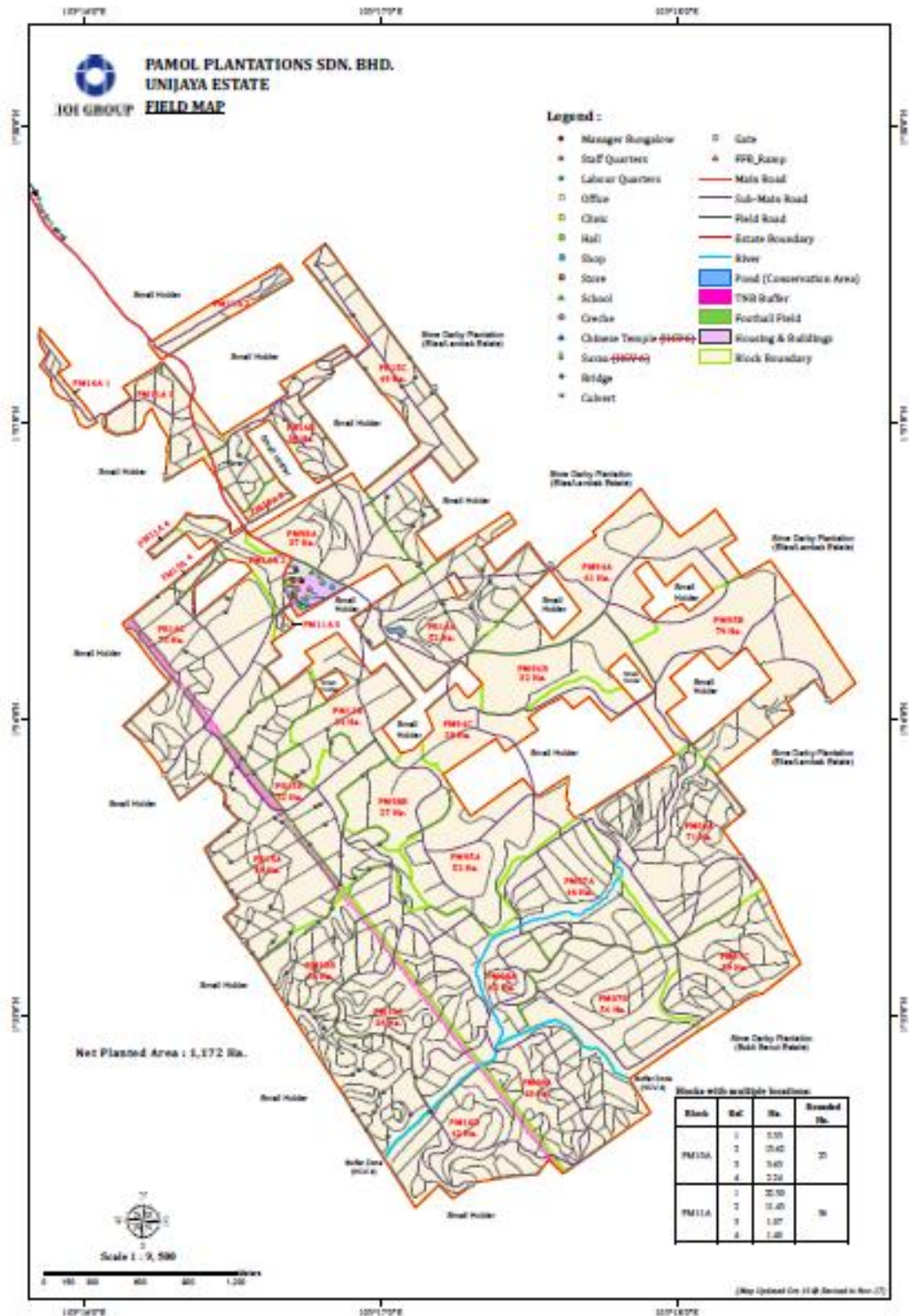
Appendix D: IOI Pamol Kluang Palm Oil Mill Location & Field Map



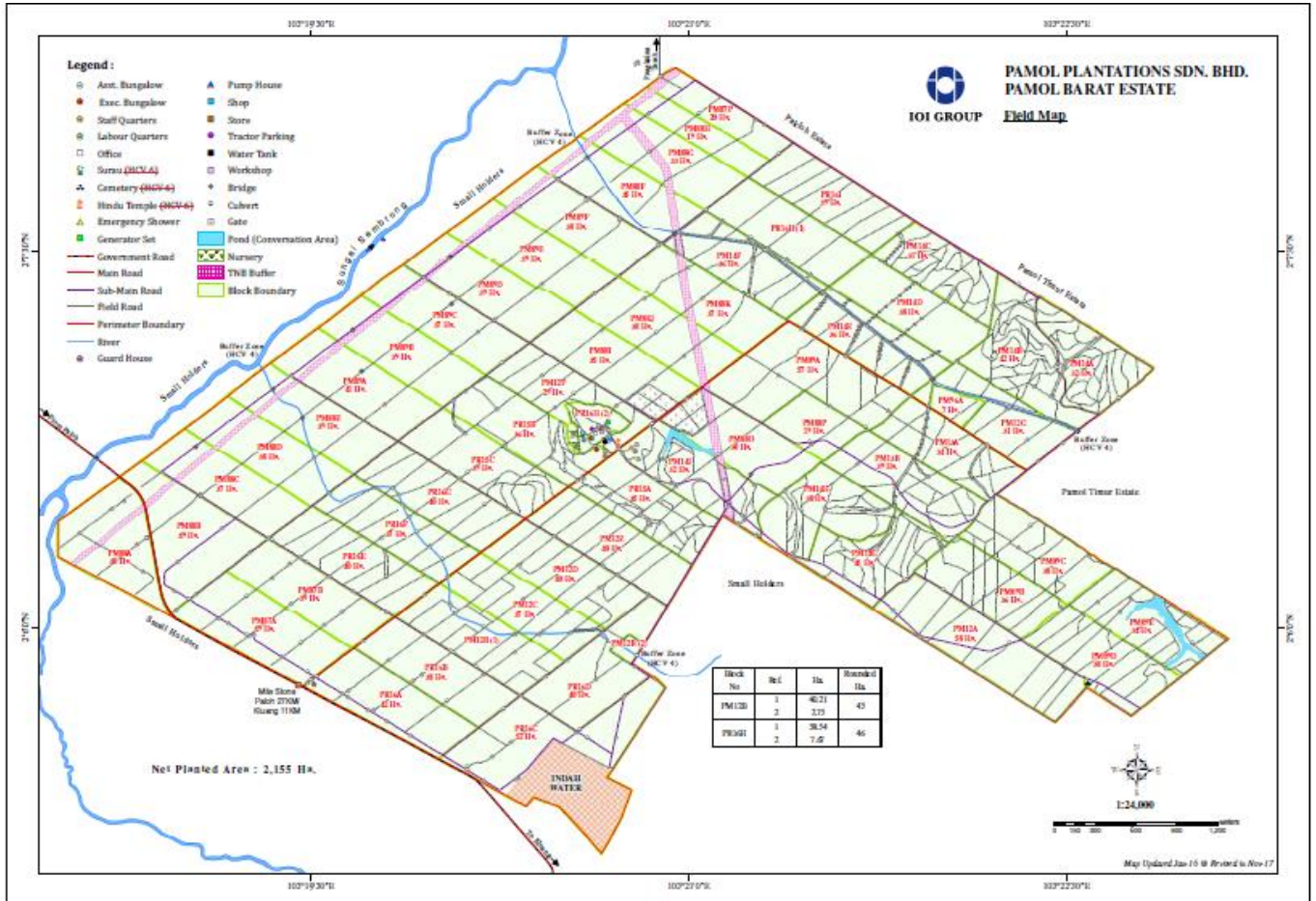
Appendix E: Pamol Timur Estate Field Map



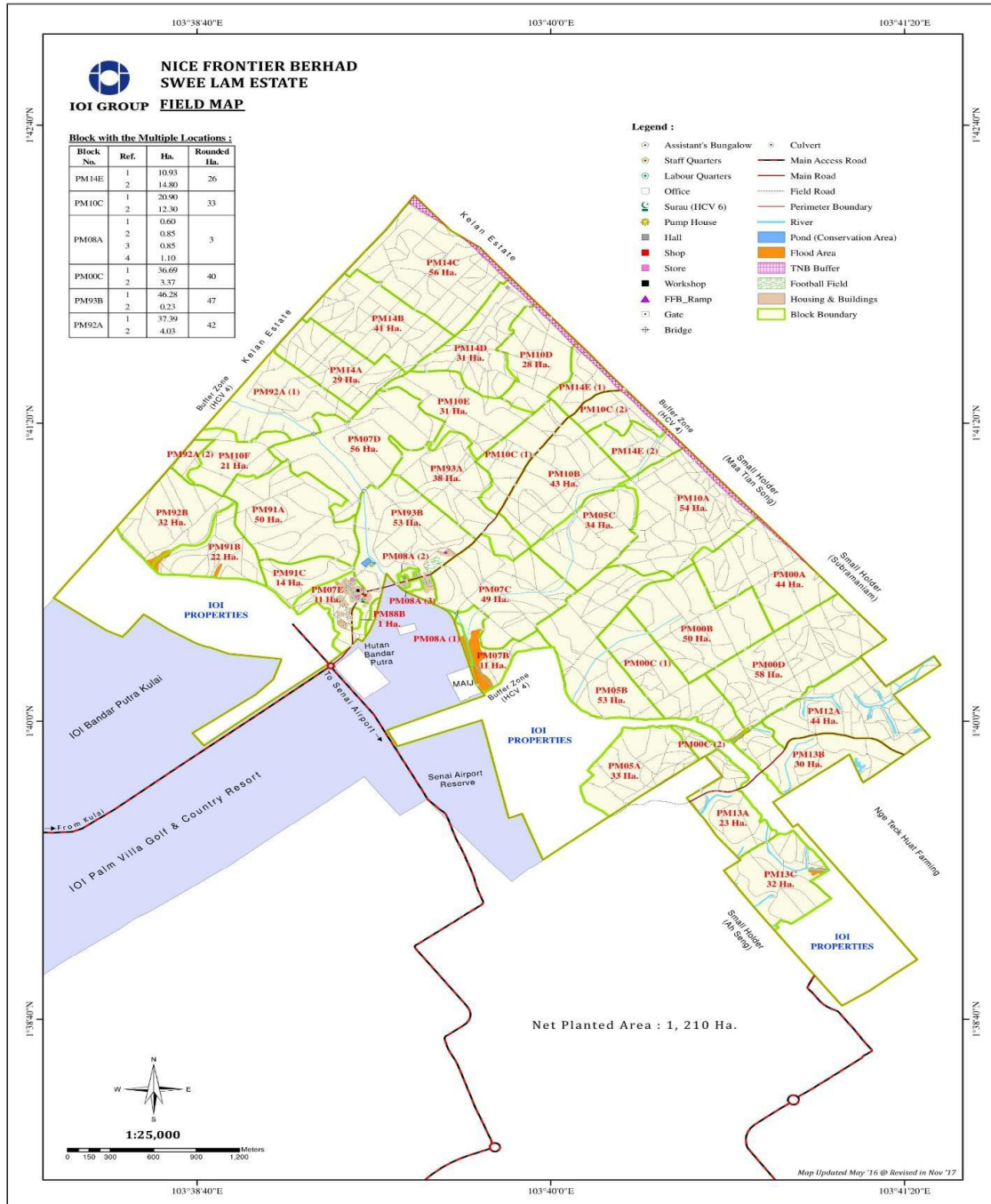
Appendix F: Unijaya Estate Field Map



Appendix G: Pamol Barat Estate Field Map



Appendix H: Swee Lam Estate Field Map



Appendix I: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm 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
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
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
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure