

**RSPO PRINCIPLE AND CRITERIA –
RECERTIFICATION ASSESSMENT (RC2)
Public Summary Report**

Client Company name (Parent Company): IOI Corporation Berhad
IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia
Certification Unit: Pamol Kluang Palm Oil Mill and Supply Base Location of Certification Unit: Pamol Kluang Oil Mill, 8 1/2 Miles, Jalan Mersing Road , 86007 Kluang, Johor Darul Takzim, Malaysia

TABLE of CONTENTS	Page No
Section 1: Scope of the Certification Assessment.....	4
1. Company Details	4
2. Certification Information	4
3. Other Certifications	4
4. Location(s) of Mill & Supply Bases	5
5. Description of Supply Base	5
6. Plantings & Cycle	6
7. Certified Tonnage of FFB (Own Certified Scope)	6
8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *	6
9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable	7
10. Certified Tonnage	7
11. Actual Sold Volume (CPO)	7
12. Actual Sold Volume (PK)	7
13. Actual Group certification Claims	7
Section 2: Assessment Process	8
2.1 Assessment Methodology, Programme, Site Visits	8
2.2 BSI Assessment Team:	10
2.3 Assessment Plan	11
Section 3: Assessment Findings	13
3.1 Normative requirement applied for this assessment:	13
3.2 Time Bound Plan progress for multiple management units	13
3.3 Progress of scheme smallholders and/or outgrowers	15
3.4 Details of findings	15
3.4.1 Status of Nonconformities Previously Identified and Observations	18
3.4.2 Summary of the Nonconformities and Status	24
3.5 Stakeholders and previous land owner / user consultation	25
3.6 Impartiality and conflict of interest	28
Formal Signing-off of Assessment Conclusion and Recommendation	28
Appendix A: Summary of Findings	30
Appendix B: Approved Time Bound Plan	125
Appendix C: GHG Reporting Executive Summary	130
Appendix D: Supply Chain Declaration	132

Appendix E: Location Map of Certification Unit and Supply bases.....136
Appendix F: Estate Field Map137
Appendix G: List of Smallholder Sampled.....139
Appendix H: List of Abbreviations140

Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	2-0002-04-000-00	Membership Approval Date	17/05/2004
Parent Company Name	IOI Corporation Berhad		
Address	IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia		
Subsidiary (Certification Unit Name)	Pamol Plantations Sdn Bhd		
Address	Pamol Kluang Oil Mill, 8 1/2 Miles, Jalan Mersing Road , 86007 Kluang, Johor Darul Takzim, Malaysia		
Contact Name	Mohd Saidani bin Dandan Satia		
Website	www.ioigroup.com	E-mail	pmm@ioigroup.com
Telephone	+603-89478888 (HQ) +607-787 5100 (Mill)	Facsimile	+607-7875179

2. Certification Information			
Certificate Number	RSPO 547027	Date of First Certification	16/03/2010
		Certificate Start Date	16/03/2020
		Certificate Expiry Date	15/03/2025
Scope of Certification	Production of Crude Palm Oil and Palm Kernel		
Applicable Standards	RSPO Principal & Criterial Malaysian National Interpretation 2019 with Identity Preserved Supply Chain Module.		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 700802	MS 2530-3:2013 (MSPO Part 3) – General principles for oil palm plantations and organised smallholders	BSI Services Malaysia Sdn Bhd	31/12/2023
MSPO 700801	MS 2530-4:2013 (MSPO Part 4) – General principles for palm oil mills		31/12/2023
MSPO 720913	MSPO Supply Chain Certification Standard 2018		24/12/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Pamol Kluang Palm Oil Mill	Pamol Kluang Oil Mill, 8 1/2 Miles, Jalan Mersing Road , 86007 Kluang, Johor Darul Takzim, Malaysia.	2° 06' 39.49" N	103° 23' 32.25" E
Pamol Timur Estate	Pamol Timur Estate , Jalan Kluang – Mersing, 86000 Kluang, Johor Kluang, Johor	2° 06' 43.10" N	103° 23' 08.30" E
Pamol Barat Estate	Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	2° 06' 46.90" N	103° 20' 38.00" E
Mamor Estate	Mamor Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	2° 08' 43.10" N	103° 18' 21.50" E
Unijaya Estate	Unijaya Estate, Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 8609 Kluang, Johor.	1° 56' 26.10" N	103° 16' 41.50" E
Kahang Estate	Kahang Estate, Peti Surat 14, 86700 Kahang, Johor.	2° 19' 55.73" N	103° 29' 51.83" E
Swee Lam Estate	Swee Lam Estate, K.B.107, 81000 Kulai, Johor Darul Takzim	1° 40' 29.00" N	103° 39' 13.60" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pamol Timur Estate	2,093.00	5.31	197.80	2,296.11	91.15
Pamol Barat Estate	2,155.00	2.33	152.99	2,310.32	93.28
Mamor Estate	2,074.00	46.04	105.44	2,225.48	93.19
Unijaya Estate	1,166.00	1.82	92.68	1,260.50	92.50
Kahang Estate	2,278.00	3.79	138.11	2,419.90	94.14
Swee Lam Estate	1,098.00	2.16	60.80	1,160.96	94.58
Total	10,864.00	61.45	747.82	11,673.27	

* *Changes of hectareage from previous year were due to resurvey of area and replanting program in all estates within Pamol Kluang complex. Some boundaries between estates were re-demarcated to enhance the HCV area.

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pamol Timur Estate	192.00	1,459.00	442.00	-	-	1,901.00	192.00
Pamol Barat Estate	689.00	1,466.00	-	-	-	1,466.00	689.00
Mamor Estate	-	95.00	1,439.00	540.00	-	2,074.00	-
Unijaya Estate	95.00	581.00	269.00	221.00	-	1,071.00	95.00
Kahang Estate	-	364.00	1,914.00	-	-	2,278.00	-
Swee Lam Estate	-	497.00	432.00	-	169.00	1,098.00	-
Total (ha)	976.00	4,462.00	4,496.00	761.00	169.00	9,888.00	976.00

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (March 2019-Feb 2020)	Actual (Nov 2018-Oct 2019)	Forecast (March 2020-Feb 2021)
Pamol Timur Estate	35,137.00	43,765.07	45,393.00
Pamol Barat Estate	27,722.00	28,796.76	27,309.70
Mamor Estate	61,974.00	59,351.59	61,964.00
Unijaya Estate	30,760.00	25,472.91	25,742.00
Kahang Estate	73,090.00	69,185.30	63,637.00
Swee Lam Estate	26,380.00	29,136.45	27,950.00
Total	255,063.00	255,708.08	251,995.70

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (March 2019-Feb 2020)	Actual (Nov 2018-Oct 2019)	Forecast (March 2020-Feb 2021)
Nil	N/A	N/A	N/A
Total	N/A	N/A	N/A

RSPO Public Summary Report
Revision 9 (Nov 2019)

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (March 2019-Feb 2020)	Actual (Nov 2018-Oct 2019)	Forecast (March 2020-Feb 2021)
Nil	N/A	N/A	N/A
Total	N/A	N/A	N/A

10. Certified Tonnage			
Mill Capacity: 60 MT/hr	Estimated (March 2019-Feb 2020)	Actual (Nov 2018-Oct 2019)	Forecast (March 2020-Feb 2021)
	FFB	FFB	FFB
	320,063.00	255,708.08	251,995.70
SCC Model: IP	CPO (OER: 24.35 %)	CPO (OER: 24.17 %)	CPO (OER: 23.50 %)
	77,939.81	61,806.99	59,219.00
	PK (KER: 4.77 %)	PK (KER: 4.70 %)	PK (KER: 4.75 %)
	15,253.15	12,026.72	11,969.80

* Estimated volume (MT) extension dated 3/12/2019: FFB = 255,063.00 + 65,000.00; CPO = 59,939.81 + 18,000.00; PK = 12,753.15 + 2,500

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	60,518.09	-	-	-	60,518.09

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	12,439.01	-	-	-	12,439.01

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	N/A	N/A
IS-CSPKO	N/A	N/A

IS-CSPKE	N/A	N/A
----------	-----	-----

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site recertification assessment was conducted from 26-29 Nov 2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out through verification of CAP was conducted on off-site 28 Feb 2020. The verification was conducted off-site since the evidence was able to be submitted electronically to confirm the effectiveness of the CAP taken.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria Malaysia National Interpretation 2019 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment

RSPO Public Summary Report
Revision 9 (Nov 2019)

- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. Prior to on-site assessment, a global stakeholder consultation has been conducted through notification dated on 14 October 2019 via website as following: [https://rspo.org/uploads/default/pnc/Public_Notification_for_Recertification_Assessment_Pamol_Palm_Oil_Mill_\(English\).pdf](https://rspo.org/uploads/default/pnc/Public_Notification_for_Recertification_Assessment_Pamol_Palm_Oil_Mill_(English).pdf). Emails also sent to selected stakeholders among NGOs, local authorities and interested parties. No feedbacks or comments received from the global stakeholder consultation and email consultation except for on-site consultation as reported under section 3.5 of this report.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_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 16, 2020 - November 20, 2020

Total No. of Mandays: 10 mandays including 1 day for SC audit

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hafriazhar Mohd Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the Economic management plan, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements. He is fluent in Bahasa Malaysia and English languages.
Mahzan Munap	Team Member	He holds a MBA from Ohio University and B Sc. in Petroleum Engineering from University of Missouri, USA. Collected over 370 days of auditing experience in OHSAS 18001 and MS 1722 OHSMS (72 days for palm oil milling and 8 days for oil palm plantation). CIMAH competent person with Malaysia Department of Occupational Safety and Health (DOSH) since 1997. An Occupational Safety and Health Trainer at INSTEP PETRONAS. Successfully completed RSPO Lead Assessor Course in 2008 and IRCA accredited Lead Assessor training for ISO 9001 and RABQSA/IRCA EMS Lead Assessor Course for ISO 14001 in 2008. During this assessment, he covered Occupational Health Safety requirement, HIRARC, mill best practices, training, OSH management plan, Legal issue and RSPO supply chain requirements. He is fluent in Bahasa Malaysia and English languages.
Rahayu Zulkifli	Team Member	During this assessment, she covered Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land. She is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:

No.	Name	Role
------------	-------------	-------------

1	Farah Hanan Roslan	BSI Malaysia Observer (no assessment coverage)
---	--------------------	--

2.3 Assessment Plan

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

Date	Time	Subjects	HMM	MM	RZ	FH
Monday, 25/11/2019	PM	Travel to Kluang & Check-in @ Anika Hotel	✓	✓	✓	✓
Tuesday, 26/11/2019 Pamol Barat Estate	0830 – 0900	Opening Meeting at Pamol Barat Estate: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation) • Verification on previous audit findings 	✓	✓	✓	✓
	0900 - 1230	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.	✓	✓	✓	✓
	1000 – 1200	Pamol Barat Estate: Stakeholder consultation	-	-	✓	✓
	1230 – 1330	Lunch break	✓	✓	✓	✓
	1330 - 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	Interim briefing	✓	✓	✓	✓
Wednesday 27/11/2019 Swee Lam Estate	0830 - 1230	Swee Lam 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.	✓	✓	✓	✓
	1230 – 1330	Lunch break	✓	✓	✓	✓

RSPO Public Summary Report
Revision 9 (Nov 2019)

Date	Time	Subjects	HMM	MM	RZ	FH
	1330 - 1630	Swee Lam 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 briefing	✓	✓	✓	✓
Thursday, 28/11/2019 Pamol Kluang Palm Oil Mill	0900 – 1230	Pamol Kluang Palm Oil Mill: Inspection of 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.	✓	✓	✓	✓
	1230 – 1330	Lunch break	✓	✓	✓	✓
	1330 – 1630	Pamol Kluang Palm Oil Mill: Lab, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓	✓
	1630 – 1700	Interim briefing	✓	✓	✓	✓
Friday, 29/11/2019 Pamol Kluang Palm Oil Mill	0830 – 1630	Supply chain audit for Pamol Kluang Palm Oil Mill <ul style="list-style-type: none"> • General COC for supply chain • RSPO rules communication and claim Module D: Identity Preserved 	✓	-	-	✓
	1630 – 1700	Closing meeting	✓	-	-	✓

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- IOI Corporation Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2018 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C Malaysia National Interpretation 2019

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. Please refer to IOI Time Bound Plan updated as of 30 September 2019.	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Referring to the Time Bound Plan updated on 30 September the management units in Indonesia is awaiting for HGU. As per the RSPO Statement on HGU, Initial certification is not permitted if there is no HGU. As for the management unit in Malaysia, it is awaiting for complaints resolution. Despite not all the management units are certified within 5 years, but it is justified and the RSPO member had demonstrated effort for certification. Furthermore, as per RSPO this requirement is valid as of June 2017. Hence it is expected that all management unit to be certified by 2022.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition by IOI.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, new rounds of (ASA) have been completed in the other certification units. Please refer to IOI Time Bound Plan updated as of 30 September 2019 and IOI ACOP 2018 (page 5) which was submitted to RSPO as per web link available as following: https://www.rspo.org/view-acop-pdf/palm-oil-processors-andor-traders/IOI_Corporation_Berhad-ACOP2018.pdf	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No. Please refer to IOI Time Bound Plan updated as of 30 September 2019 and IOI ACOP 2018 (page 5) which was submitted to RSPO	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No. Please refer to IOI Time Bound Plan updated as of 30 September 2019 and IOI ACOP 2018 (page 5) which was submitted to RSPO as per web link available as following: https://www.rspo.org/view-acop-pdf/palm-oil-processors-andor-traders/IOI_Corporation_Berhad-ACOP2018.pdf</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>Complaint was raised against PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS), PT Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad). However the complaint has been resolved.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>IOI concession in Indonesia PT. BSS and PT. KPAM had underwent the NPP process prior to any new planting. Please refer to IOI latest Time Bound Plan updated as of 30 September 2019.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>Settlement on the dispute over land ownership in Tinjar Long Lapok is still in progress through the engagement programme headed by the IOI stakeholder team. Please refer to IOI latest Time Bound Plan updated as of 30 September 2019.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No complaints received</p>	<p>Complied</p>
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Legal-compliance framework is available to manage any non-compliance. The framework is managed centrally.</p>	<p>Complied</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes. As per verified Internal Audit Checklist and the Stage 1 Audit Plan for SNA Group which was conducted on 9 – 12 September 2019.</p>	<p>Complied</p>

RSPO Public Summary Report
Revision 9 (Nov 2019)

Have there been any stakeholder (including NGO) consultation conducted?	NO. Implementation on Sustainability progress in 2018 including Certification progress have been verified by independent third party. The report is publicly available in IOI website as per web link as following: https://www.ioigroup.com/Content/S/PDF/Proforest_IOI_Stage1_public_report_final.pdf	Complied
---	--	----------

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable	N/A

3.4 Details of findings

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

During the Certification Assessment there was one (1) Major nonconformity raised. The Pamol Kluang Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	1852239-201911-M1	Clause & Category (Major / Minor)	RSPO P&C MYNI 2019 Indicator 2.1.1 (Major)
Date Issued	29/11/2019	Due Date	27/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	A female worker at the Pamol Kluang Palm Oil Mill who works the night shift has not received: a. Shift allowance; and b. 11 hours continuous rest before she re-commenced her work.		

RSPO Public Summary Report
Revision 9 (Nov 2019)

<p>Requirement Reference:</p>	<p>The unit of certification complies with applicable legal requirements.</p>
<p>Objective Evidence:</p>	<p>The Department of Labour has granted the Pamol Kluang Palm Oil Mill an exemption under Section 34 Employment Act 1955 allowing female employees to work between 10.00PM to 5.00AM. This exemption is subject to conditions stipulated in the Labour Department Peninsular Malaysia letter dated 15 March 2019, (Ref BHG PU/9/135 Jld 18(5)).</p> <p>The conditions states: - Paragraph 2 (iii): Receive 11 hours continuous rest before she re-commences work; and - Paragraph 2 (vi): Paid shift allowance in accordance with the collective agreement.</p> <p>Objective evidence shows that on the above dates, the working hours of Worker No. 2609 at Pamol Kluang Palm Oil Mill were as follows:</p> <p>Date OT working hours and time start work the next day Rest hours 16 May 2019 4.00PM to 12.00AM 7.00AM 7 hours 17 May 2019 4.00PM to 11.00PM 7.00AM 8 hours 18 May 2019 4.00PM to 12.00AM 7.00AM 7 hours 10 June 2019 4.00PM to 11.00PM 7.00AM 8 hours</p> <p>Worker 2609: 1. Re-commenced work without having 11 hours continuous rest. This is not in compliance with the terms and conditions imposed by the Labour Department Peninsular Malaysia via paragraph 2 (iii) of the letter Ref BHG PU/9/135 Jld 18(5) dated 15 March 2019. 2. Was not paid shift allowance. This is not in compliance with the terms and conditions imposed by the Labour Department Peninsular Malaysia via letter Ref BHG PU/9/135 Jld 18(5) dated 15 March 2019 (paragraph 2 (vi)) and Article 41 (a) of the IOI Group of Companies/AMESU Agreement 2018 of the MAPA Agreement states that an employee working the second shift is entitled to RM4.70</p>
<p>Corrections:</p>	<p>i) Not receiving 11 hours continuous rest The mill management has immediately arranged for K. Sunthara Devi to only work on day shift (7.00am to 4.00pm). Another staff who was previously working as weighbridge operator is kept on standby to take over the duties in case the afternoon shift operator suddenly takes leave on short notice. This is to ensure that K. Sunthara Devi has at least 11 hours continuous rest.</p> <p>ii) Not receiving shift allowance The shift allowance which was unpaid for a total of 11days (RM51.70) was paid to K. Sunthara Devi on 24th December 2019 via Petty Cash voucher No. PMM 7940 (see Appendix 1). This amount will be shown in K. Sunthara Devi's January 2020 payslip.</p>
<p>Root Cause Analysis:</p>	<p>i) Not receiving 11 hours continuous rest The normal working hours for K. Sunthara Devi are from 7.00am to 4.00pm. However, she worked without 11 hours of continuous rest on the days mentioned above when the male weighbridge operator who is supposed to work from 2.00pm to end of shift suddenly takes emergency leave/medical leave. As there are no</p>

RSPO Public Summary Report
Revision 9 (Nov 2019)

	<p>other persons to replace him, K. Sunthara Devi has to work until the end of the shift sometimes until 11.00pm (end of shift). As she reports for work at 7.00am on the next day, she only has about 8 hours continuous rest.</p> <p>ii) Not receiving shift allowance The employee in question was not given shift allowance because she was replacing the other weighbridge operator and the extra hours worked were calculated and paid as Overtime Work</p>
Corrective Actions:	<p>i) Not receiving 11 hours continuous rest Mill management is actively looking to recruit an additional employee for the weighbridge operations. With 3 employees, mill management will rotate them on shift basis to ensure that all employees get adequate rest as per JTK requirement.</p> <p>ii) Not receiving shift allowance Mill management is paying shift allowance for all second shift/evening shift work effective immediately.</p>
Assessment Conclusion:	<p>Major NC close out verification done off-site and phone call to respective affected employee was conducted as cross-checking to confirm corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> - Agreement on Shift Allowance Payment of K. Sunthara Devi's dated 30/11/2019 - Agreement on Shift Work Arrangement of K. Sunthara Devi's dated 17/2/2020 - Payment voucher of unpaid allowance for K. Sunthara Devi's dated 24/12/2019 - Allocation of allowance for K. Sunthara Devi's as per January 2020 Payslip - Offer Letter of Newly Recruited Weighbridge Operator dated 2/1/2020 <p>Off-site evidence verification and cross-checking confirmed the CAP was found to be effective thus the major NC was closed on 27/2/2020. Continuous implementation will be further verified in the next audit.</p>

Opportunity for Improvements	
OFI #	Description
1852239-201911-I1	<p>Indicator 6.2.2:</p> <p>1. All foreign workers sign their employment contracts with Human Resource Manager, Plantation. The contracts are prepared in Bahasa Malaysia for the Indonesian workers. For workers from India, Bangladesh, etc, they sign on 2 different and separate documents; namely:</p> <p>a) contract in English, and b) contract in the language they understand (e.g. Hindi).</p> <p>The current practice sees both parties signing on a document they don't understand. For example, the Indian worker does not understand the English version of the agreement, and the Human Resource Manager does not understand the Hindi version of the contract. As an opportunity for improvement, both a) and b) can be combined into one document so that both parties sign on a document they both simultaneously understand.</p>

RSPO Public Summary Report
Revision 9 (Nov 2019)

	<p>2. In cases where the workers are illiterate, the operating units get a translator to explain the employment contracts to the foreign workers. As an opportunity for improvement, such translation be recorded and acknowledged.</p> <p>3. Foreign workers signed a New/Amended Terms and Conditions of Employment Contracts (January 2019) to incorporate changes in employment terms such as payment of minimum wages and mutual termination clauses, among others. For improvement, these documents should be dated so that its duration is clear.</p>
1852239-201911-I2	<p>Indicator 6.6.1:</p> <p>All foreign workers are given the option of either keeping their own passport at the linesite, or for safety purposes, keep their passports in locked pigeon boxes placed at the office. Most workers are given their own keys to the pigeon boxes. At Swee Lam Estate, because of insufficient number or pigeon boxes and keys, all workers in that house keep their passports together in one pigeon box, and the house leader keeps the key.</p> <p>As an opportunity for improvement, each worker in that house be given a key to the pigeon box. This is to ensure that each of them can have access to their own passports at any time, without relying on the house leader.</p>
1852239-201911-I3	<p>Indicator 4.1.1:</p> <p>The IOI Group Sustainable Palm Oil Policy states that it upholds the rights of all workers in accordance with, inter alia, the United Nations Guiding Principles on Business and Human Rights. Clause 26 of this Guiding Principles mentions that legitimate and peaceful activities of human right defenders are not obstructed.</p> <p>As an opportunity for improvement, a specific reference to prohibiting retaliation against Human Rights Defenders is specifically documented in the IOI Group Sustainable Palm Oil Policy so that this can be clearly communicated and made understood to all operating units.</p>

Positive Findings	
PF #	Description
PF 1	Stakeholder interview – mostly positive feedbacks
PF 2	Good continuous improvement program implementation generally for productivity and safety aspects
PF 3	Cleanliness and good maintenance at worker’s housing
PF 4	Good documents retrieval

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1713476-201811-M1	Clause & Category (Major / Minor)	RSPO SCCS - 5.3.2 (Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	18/1/2019

RSPO Public Summary Report
Revision 9 (Nov 2019)

Statement of Nonconformity:	The written procedure for internal audit was not included the conformance of the requirements of RSPO Market Communications and Claims Documents and the coverage of internal audit was not comprehensive.
Requirement Reference:	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization
Objective Evidence:	SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018) was developed to outline the process of internal audit and the internal audit needs to be carried out at least once a year which covered for RSPO SCCS requirements. However, the requirements of RSPO Market Communications and Claims has yet to be included into the procedure. Besides, Internal audit was carried out on 10/10/2018 for RSPO Supply Chain Certification. However, the audit was only covered the Module D: Identity Preserved. Requirements of Chain of Custody and RSPO Market Communications and Claims Documents have not been audited during the internal audit.
Correction/containment	The SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies will be revised further. Another internal audit report covering RSPO Supply Chain Certification Standard (including Requirements of Chain of Custody and Module D) and RSPO Rules on Market Communication and Claims was developed. Refer to Appendix 2 – Pamol Mill 2018 RSPO COC & SCCS Internal Audit Report.
Cause	In the SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 07 dated 28/11/2018), compliance to RSPO Rules on Market Communication and Claims was not specifically mentioned as it was already mentioned in item 4.1.10 which is about the uses of the RSPO trademark and claims. The internal audit was conducted based on RSPO Supply Chain Standards which covers items in Requirements of Chain of Custody and Module D and also based on RSPO Market Communications and Claims Document. However the RSPO Supply Chain Internal Audit Report was not comprehensive, whereby it just included Module D. This practice was deemed to be compliant as it was not disputed in the previous annual surveillance audits.
Corrective Actions:	The SOP for CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies (Doc. No. RSPO/SOP/COC/3, Issue No. 08 dated 03/12/2018), has been revised by including compliance towards requirements of RSPO Rules on Market Communications and Claims. Refer to Appendix 1 – RSPO SOP Mill Management System (Issue 8). A new internal audit report template covering RSPO Supply Chain Certification Standard (including Requirements of Chain of Custody and Module D) and RSPO Rules on Market Communication and Claims was developed. This format of audit report will be used for the upcoming internal audits and amendments will be made according to the updates on RSPO Supply Chain Certification Standard and RSPO

RSPO Public Summary Report
Revision 9 (Nov 2019)

	Rules on Market Communication and Claims. Refer to Appendix 3 - RSPO COC & SCCS Internal Audit Report Template.
Assessment Conclusion:	<p>RAV 2 verification:</p> <p>Procedure of internal audit has been included in Procedure Title: CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies; Doc. # RSPO/SOP/COC/3; Issue # 09; Date; 7/5/2019 under paragraph 5.1 Internal Audit. Also included 5.2 Handling Complaints and 5.3 Handling Non-Conformities.</p> <p>Latest internal audit was conducted on 26/9/2019 as per Pamol Palm Oil Mill 2019 Chain of Custody & Supply Chain Certification Internal Audit Report. A total of 8 nonconformities were raised by internal auditors were taken action and verified to be effective and closed by internal auditors on 21/11/2019.</p> <p>All findings were discussed during the management review meeting conducted on 20/11/2019.</p> <p>Based on verification above, corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. Revised procedures implementations were effectively evidence. Hence, Major NC remained closed.</p>

Non-conformity			
NCR Ref #	1713476-201811-M2	Clause & Category (Major / Minor)	RSPO SCCS - 5.4.1 (Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	18/1/2019
Statement of Nonconformity:	The information on the Despatch Note for purchase of FFB was not available or insufficient.		
Requirement Reference:	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 		

RSPO Public Summary Report
Revision 9 (Nov 2019)

<p>Objective Evidence:</p>	<p>Sampled of weighbridge tickets/ FFB consignment note/ Despatch note below found not following the minimum information:</p> <p>a. Kahang Estate and Mamor Estate did not included the Certified Sustainable FFB stamping and the RSPO Certificate Number was stated as SPO 547027 instead of RSPO 547027 in Despatch Number. (Despatch No.: 17071 and Despatch No.: 50103)</p> <p>b. Unijaya Estate did not included the RSPO Certificate Number and only mentioned the product as FFB in Despatch Number. (Despatch No.: 51269)</p> <p>c. RSPO Certificate Number stated in Despatch Note of Swee Lam Estate was SPO 547027 instead of RSPO 547027. (Despatch No.: 58035)</p>
<p>Correction/containment</p>	<p>All the Supply Chain Officers in the supply base estates are instructed to amend the information in their respective weighbridge tickets to include the following information:</p> <ol style="list-style-type: none"> 1. RSPO SCC number (RSPO 547027) 2. Product description with supply chain model (CSFFB/IP)
<p>Cause</p>	<p>The weighbridge tickets issued in the estates, contain the following information:</p> <ul style="list-style-type: none"> • The name and address of the seller. • The loading/delivery date. • The date on which the documents were issued. • The quantity of the products delivered. • Supply Chain certificate number of the seller (SPO 547027) • A unique identification number (weighbridge ticket no.) <p>In addition to that a rubber stamp that are used to stamp at the back of the ticket contains the following information:</p> <ul style="list-style-type: none"> • The name and address of the buyer. • The name and address of the seller. • Description of the product (Sustainable Product : Fresh Fruit Bunch, FFB) • RSPO Supply Chain Certificate Number (SPO 547027) <p>The Supply Chain Certificate Number (SPO 547027) in both the ticket and stamp was not updated since 2015, thus it was following the old certificate number found in the certificate issued in 2015. The person in charge, Supply Chain Officers in the supply bases (estates) failed to amend this info in both the weighbridge ticket and rubber stamp, as they were not aware of the changes and also they were not highlighted during their training.</p> <p>Since Pamol Kluang mill and its supply bases held more than one sustainable production certifications (RSPO and ISCC) previously, thus to generally claim that the Fresh Fruit Bunches (FFB) from the estates are certified for both the certification standards and cater the requirements of both the certification standards, the information in rubber stamp just indicated, 'Sustainable Product : Fresh Fruit Bunch'.</p>
<p>Corrective Actions:</p>	<p>The information in the weighbridge ticket has been amended to include the following additional information:</p>

RSPO Public Summary Report
Revision 9 (Nov 2019)

	<p>1. RSPO cert. number (RSPO 547027)</p> <p>2. Product description with supply chain model (CSFFB/IP)</p> <p>Refer :</p> <p>Appendix 1 - Swee Lam Estate weighbridge ticket</p> <p>Appendix 2 - Mamor Estate weighbridge ticket</p> <p>Appendix 3 - Unijaya Estate weighbridge ticket</p> <p>Appendix 4 - Kahang Estate weighbridge ticket</p> <p>A training has been conducted for all the Supply Chain Officers on "RSPO Supply Chain Certification Standards" and "RSPO Rules on Market Communication and Claims".</p> <p>Refer :</p> <p>Appendix 5 – Training Records (RSPO SCCS)</p>
<p>Assessment Conclusion:</p>	<p>RAV 2 verification:</p> <p>As per sample FFB received tickets as following:</p> <ul style="list-style-type: none"> - Supplier: Pamol Timur Estate; Weighbridge ticket # FB19004074; Date: 27/11/2019; Net weight: 5,650kg; Block: PM11B; Vehicle # WXE538 - Supplier: Pamol Barat Estate; Weighbridge ticket # FB19004072; Date: 27/11/2019; Net weight: 4,450kg; Block: PM16E; Vehicle # VAR7334 - Supplier: Kahang Estate; Weighbridge ticket # FB19004077; Date: 27/11/2019; Net weight: 43,010kg; Block: 01AB, 02E, 03AB; Vehicle # PGQ2757 <p>Based on verification above, corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. Revised procedures implementations were effectively evidence. Hence, Major NC remained closed.</p>

Non-conformity			
NCR Ref #	1713476-201811-N1	Clause & Category (Major / Minor)	2.2.2 (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	26/11/2019
Statement of Nonconformity:	The clauses of the below requirements were not adequately addressed.		
Requirement Reference:	Legal boundaries shall be clearly demarcated and visibly maintained.		
Objective Evidence:	<p>Field visits at Unijaya Estate found the following:</p> <p>a) No boundary demarcation was sighted at Block 16A and a grassy patch/oil palm smallholder.</p> <p>b) Legal boundary demarcation was poorly visibly maintained at Block 16A and Vegetable farmer and at Block 94A and the same vegetable farmer.</p>		
Correction/containment	a) After discussing with the smallholder, we came to a mutual verbal agreement to place back the boundary marking after the boundary trench.		

RSPO Public Summary Report
Revision 9 (Nov 2019)

	b) The frond and trenches are cleared by using JCB for better visibility of boundary marking and boundary upkeep programme is implemented for improvement.
Cause	a) The marking was sighted at the boundary previously at the boundary with the smallholder (right after the boundary trench). After investigating with the smallholder, the smallholder removed the marking because it was placed at his land. b) The smallholder placed the frond at the boundary trench which causes the boundary marking to be poorly visible.
Corrective Actions:	a) To follow the boundary marking programme in order to maintain a good visible boundary marking. b) A programme to upkeep all the boundary marking is done for maintaining a good visibility on the estate boundary.
Assessment Conclusion:	RAV 2 verification: As per SOP on Sustainability IOI Group Estate Boundary and Block Marking; SOP 4/2; Issue/rev. 1/1b; Date: 1/7/2019 – 2.0 Standard Procedure of Field/Block Boundary Marking – Compulsory Marking sighted at all visited estate within the vicinity of their field boundaries. Based on verification above, corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. Revised procedures implementations were effectively evidence. Hence, Minor NC was closed on 26/11/2019.

Non-conformity			
NCR Ref #	1713476-201811-N2	Clause & Category (Major / Minor)	5.2.4 (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	26/11/2019
Statement of Nonconformity:	The status of HCV monitoring was not reflective of actual sightings in the field and the sighting record (Monthly Monitoring Checklist – Buffer Zone) contradicts the age (brown colour fronds) of the fronds sighted.		
Requirement Reference:	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the management plan. 		
Objective Evidence:	The monthly monitoring activities carried out at Pamol Timur Estate could have been thorough in the months of October and November 2018 (see their checklist form Monthly Monitoring Checklist – Buffer Zone) as Auditor’s sighting in the field on 27.11.18 found the brown fronds in two spots of the Buffer Zone area at Block PM-04A. This clearly demonstrates non-conformance against the requirement of item no. 7, Buffer Zone Signage, erected 100m away. Further trailing of the above non-conformance records sighted in the above two Monthly Monitoring Checklist showed “No Frond Stacking in the Buffer Zone” recorded in column Field: 09B1 confirmed as YES by the signature indicated in the column PIC Monitored and Recorded and PIC Verifier and Signature when they were not.		

RSPO Public Summary Report
Revision 9 (Nov 2019)

Correction/containment	Immediate action was taken by removing the stacked fronds from buffer zone area.
Cause	Harvesters are generally aware that pruned fronds are not supposed to be stacked within the buffer area. However, upon investigating Mr. Slamet, the harvester who worked in Block PM-04A and stacked the frond, it was found that he is having lack of awareness of not to stack pruned fronds in buffer zone area.
Corrective Actions:	A reminder letter was issued to the relevant personnel such as Mr. Hairul Fadly bin Abdullah (Field Supervisor), Mr. Medianris (Field Mandore) and Mr. Slamet (Harvester) to ensure this issue does not repeat again. Retraining on Buffer Zone practices has been conducted to improve harvester’s understanding on buffer zone practices.
Assessment Conclusion:	RAV 2 verification: For existing plantations, HCV assessment has been reviewed on November 2019 by the executive from the sustainability team who has attended HCV training. IOI sustainability team has prepared a Management Plan for protection of the HCV area in Pamol Barat estates and at mill housing site complex that is based on habitat protection as well as enhancement of the area. HCV/Conservation area checklist sighted being monitored on monthly basis. Based on verification above, corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. Revised procedures implementations were effectively evidence. Hence, Minor NC was closed on 26/11/2019.

Opportunity for Improvement	
OFI#	Description
OFI 1	-Nil-

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1143838M1	Major	2.1.1	9/1/2015	Closed on 2/4/2015
1143838M2	Major	2.2.1	9/1/2015	Closed on 2/4/2015
1143838M3	Major	6.5.1	9/1/2015	Closed on 2/4/2015
1143838N1	Minor	5.3.3	9/1/2015	Closed on 17/12/2015
1279712M1	Major	2.1.1	15/12/2015	Closed on 31/12/2015
1279712N1	Minor	2.1.4	15/12/2015	Closed on 20/12/2016
1279712N2	Minor	4.1.3	15/12/2015	Closed on 20/12/2016
1420891M1	Major	6.5.2	23/12/2016	Closed on 7/2/2017

1420891M2	Major	SCCS Module D 4.2	23/12/2016	Closed on 7/2/2017
1420891M3	Major	4.6.11	23/12/2016	Closed on 7/2/2017
1420891M4	Major	2.1.1	23/12/2016	Closed on 7/2/2017
1420891N1	Minor	4.4.1	23/12/2016	Closed on 15/12/2017
1420891N2	Minor	5.3.3	23/12/2016	Closed on 15/12/2017
1559784-201712-M1	Major	4.1.1	15/12/2017	Closed on 30/01/2018
1559784-201712-N1	Minor	4.1.2	15/12/2017	Closed on 29/11/2018
1713476-201811-M1	Major	RSPO SCCS 5.3.2	29/11/2018	Closed on 18/1/2019
1713476-201811-M2	Major	RSPO SCCS 5.4.1	29/11/2018	Closed on 18/1/2019
1713476-201811-N1	Minor	2.2.2	29/11/2018	Closed on 26/11/2019
1713476-201811-N2	Minor	5.2.4	29/11/2018	Closed on 26/11/2019
1852239-201911-M1	Major	2.1.1	29/11/2019	Closed on 27/2/2020

3.5 Stakeholders and previous land owner / user consultation

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

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

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

List of Stakeholders contacted	
Internal Stakeholders General workers Mill operators Harvesters Sprayers Gender committee representative	Local communities/Union/Contractors Kampung Pengkalan Tereh representatives Mill vendors (contractors & suppliers) Estate vendors (contractors & suppliers) Estate sundry shop operators
Government Departments Sekolah Kebangsaan Pengkalan Tereh	NGO

RSPO Public Summary Report
Revision 9 (Nov 2019)

Wildlife Dept. Johor, JTK Johor, DOSH Johor, DOE Johor (via email)	Tenaganita, Wetlands, Sahabat Alam Malaysia, WWF, Amnesty (via email)
--	---

IS #	Stakeholders comment
1	<p>Feedbacks: Vendors (Contractors/Suppliers)</p> <ul style="list-style-type: none"> - Contractors informed that operating costs have increased over the past years, but contract price has not increased proportionately. This has led to reduced profit margins. - Positive feedback: payments are received within 15 days of date of invoice.
	<p>Management Responses:</p> <p>Negotiation on terms of contracts are handled by the headquarters and is beyond the control of estate management.</p>
	<p>Audit Team Findings:</p> <p>Negotiations where parties agree on the terms of the contract are held between the contractors and the IOI HQ. Once parties agree on the terms, the IOI HQ will prepare the contract. Essentially when the contracts are signed, parties are assumed to have agreed to the contents.</p>
2	<p>Feedbacks: Sundry shop operator</p> <p>Sundry shop operator at Pamol Barat Estate suggested a rental waiver. Currently the rental is RM150 per month since 2003. This excludes electricity and water bills.</p>
	<p>Management Responses:</p> <p>Management informed that canteen operator has signed a contract with Pamol Barat Estate where the amount of rental is clearly stipulated. The rent has not been increased since 2003. In addition, the Estate also attends to repair works, and the Estate gardener also comes to clean the surrounding area and dispose of rubbish free of charge. Any changes to the payment of rent can only be discussed after the expiry of the existing contract.</p>
	<p>Audit Team Findings:</p> <p>Verified the existence of a valid 2-year contract dated 1 Jan 2018 between Pamol Plantations Sdn Bhd and Lee Hock Yam and Juang Haufor for canteen operation at Pamol Barat Estate. This contract will expire on 31 Dec 2019. The contract also specifies the rental at RM150 per month. There is no provision on rental reduction in the contract.</p>
3	<p>Feedbacks: Sekolah Kebangsaan Pengkalan Tereh</p> <p>Sekolah Kebangsaan Pengkalan Tereh commends the positive cooperation given by Pamol Barat Estate. The Estate had, in previous years, been generous in extending financial assistance. However, this has reduced since 2019. For example, in early 2019, the school requested in writing for palm seedlings but has only received a verbal response that the Estate cannot supply as requested.</p>
	<p>Management Responses:</p> <p>Management of Pamol Barat Estate confirmed that it responded verbally to inform the school that it could not supply the seedlings. Future communications will be done in writing.</p>
	<p>Audit Team Findings:</p> <p>There is no written response to the school's request for palm seedlings. However school representative confirmed to received verbal response from estate management.</p>
4	<p>Feedbacks: Kg Pengkalan Tereh representative</p> <p>Representative from Kg Pengkalan Tereh informed that:</p>

RSPO Public Summary Report
Revision 9 (Nov 2019)

	<ul style="list-style-type: none"> - Pamol Barat Estate used to help to cut the grass at the common field in Kg Pengkalan Tereh. However, this has stopped. Request that the grass mowing re-commence. - The common access road used by villagers and school is in need of repair. An application to tar the road has been approved, but work has not started. Would like to know when this would be done. - The Pamol Barat Estate does not seem to enforce its own rules on mandatory use of motorcycle safety helmets via its "Notis Pemakaian Topi Keledar". Many of the estate workers can be seen riding their motorbikes without safety helmets. - Request for Pamol Barat Estate to cut grass near Ladang Pakloh.
	<p>Management Responses:</p> <ul style="list-style-type: none"> - Grass cutting: There is no fixed schedule for grass cutting. This is only carried out upon request. - Common road access: This is a government initiative. The Estate has no objection using the access road, but the commencement of road repairs is not within its purview. - Motorcycle helmet: Training has been given to workers on the rules to wear helmets when riding the motorbike. The Auxillary Police (AP) also conduct checks to enforce the rule. However, maybe the AP may have missed one or two motorcyclists. - The estate will send someone with a rotor slasher to clear the undergrowth near Ladang Pakloh.
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - There has been no request for grass cutting from the villagers of Kg Pengkalan Tereh. - Although the road is within the Pamol Kluang premises, the repair works are not within the Estate's purview. - Awareness briefing on the use of motorcycle helmet was done on 22 Feb 2019 by the Assistant Manager at muster ground. This was attended by local and foreign workers of Pamol Barat Estate. - The estate would arrange for a grass cutter to be sent to clear the undergrowth near Padang Pakloh.
<p>5</p>	<p>Feedbacks: Authorities & NGO (via email) No feedbacks received from emailed stakeholders</p> <p>Management Responses: Info noted</p> <p>Audit Team Findings: No further issue</p>



List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Pamol Plantations Sdn. Bhd. (Unilever Group) for Pamol Barat Estate	Until 1997	2,310.32	Yes	No	Yes, ownership changed due to estate bought over by IOI Corporation Berhad in 1997
Dunlop (M) Sdn. Bhd. for Swee Lam Estate	Until 1995	1,160.96	Yes	No	Yes, ownership changed due to estate bought over by IOI Corporation Berhad in 1995

Previous land owner / user comment

Nil	Feedbacks: N/A
	Management Responses: N/A
	Audit Team Findings: N/A

3.6 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team consist of Hafriazhar Mohd. Mokhtar as Audit Team Leader, Mahzan Munap and Rahayu Zulkifli as Audit Team Members as well as Farah Hanan Roslan as Observer.

Formal Signing-off of Assessment Conclusion and Recommendation	
The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Pamol Kluang Palm Oil Mill and Supply Base has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Pamol Kluang Palm Oil Mill and Supply Base is continued.	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: Ravi Tony
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: IOI Plantation Services Sdn. Bhd.
Title: Lead Auditor	Title: Sustainability, Safety and Health Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 23/3/2020	Date: 3/4/2020

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p>	<p>There is evidence that stakeholders were informed during stakeholder meeting dated 13 November 2019 of documents that are made available to the public. The stakeholder meeting was attended by stakeholders of Pamol Barat Estate, Swee Lam Estate and Pamol Kluang Mill. The documents that are available for public viewing include the following:</p> <ul style="list-style-type: none"> ➤ RSPO, MSPO and ISCC principles ➤ Grievance procedure on land matters ➤ Complaints book ➤ Replanting program ➤ Employment opportunities ➤ Sustainable Palm Oil Policy ➤ Zero Burning Policy ➤ Environmental Impact Assessment, Management Action Plan ➤ Social Impact Assessment, Management Action Plan ➤ Continuous Improvement Plan ➤ Negotiation procedure for land issues ➤ Whistleblowing policy ➤ Stakeholder complaint procedure ➤ Land use compensation procedure ➤ Stakeholder request procedure ➤ Details of complaints and grievances 	Complied

		<p>➤ Negotiation procedures</p> <p>Above are among the documents mentioned in the RSPO P&C which are relevant to the existing operations of the Pamol Kluang Mill and its supply base.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>The documents are provided in English and Bahasa Malaysia, and are available at the Estate and Mill offices, and are accessible to the stakeholders.</p> <p>Additional information provided to the stakeholders, for example, on RSPO, MSPO and ISCC principles were given verbally in Bahasa Malaysia.</p> <p>Information provided by the Swee Lam Estate to the Dept of Statistics Malaysia pertaining to Environmental Protection Expenditure Survey 2019 was provided in Bahasa Malaysia. Among the details given included certifications obtained, waste management and sewerage services, other environmental protection expenditure, etc. Additionally, information provided by Swee Seng Estate to the Labour Office were also in Bahasa Malaysia.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>There is evidence that records for request for information and responses are maintained. At Swee Lam Estate, a request sent by the Estate for permission to use private water source under Section 6(1) (a) of the Workers' Minimum Standard of Housing Act 190 was sighted. It contained details regarding location, hectarage, number of workers, breakdown of worker nationalities, number of houses at the linesite, number of occupants, etc.</p> <p>The response received from the Labour Office dated 30 Sept 2019 (Ref: (27) JKNJ(K) 30(3)34 Jld 3 was also maintained and sighted. The response from the Labour Office was to request the Kulai District Health Office to visit the estate premises and obtain water samples for analysis by the Department of Chemistry, Malaysia. The results of the water quality analysis would determine if the Estate would be granted permit under Section 6(1) (a) of the Act. A copy of the water quality analysis was also maintained and sighted.</p>	Complied

1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Consultation and communication procedure is available and documented under SOP 1.0 Appendix 4 Issue 1 Rev 0, Date 16 Jan 2018. This procedure is applicable to all employees, stakeholders, and the public. It is also outlined in 'Stakeholder Request Procedure', 'Grievances Reporting Flow Chart' and 'Grievance Procedure For Land Owner Issues'. These documents are documented, disclosed and made available as briefed by the Manager of Pamol Kluang Palm Oil Mill to the stakeholders during stakeholder meeting held on 13 November 2019.</p> <p>According to the procedure, any communication from the public will be responded to within 5 working days. The Procedures are communicated verbally to the stakeholders at the stakeholder meeting and displayed on notice boards at the work places and workers' housing quarters.</p> <p>Awareness briefings on the consultation and communication procedures were done to all levels of workforce during morning muster at Pamol Kluang Palm Oil Mill (on 22 November 2019) and Swee Lam Estate (on 7 August 2019). Interviews conducted with the workers also showed that they are aware of this communication and consultation procedures.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p>	<p>Each unit within Pamol Kluang Mill complex has its own list of contact and details of stakeholders. Their nominated representatives are also duly identified with full name and telephone numbers.</p> <p>The stakeholders comprise government agencies such as the Labour Department, Immigration Department, Department of Wildlife and National Parks, Department of Environment, Department of Safety and Health, Embassies/Consulates/High Commission of India, Indonesia, Republic of Philippines and Nepal. Also included are neighbouring estates and smallholders, neighbouring villages, schools, canteen/shop operators, suppliers, contractors, AMESU, NUPW, etc.</p>	Complied

		The stakeholder list is updated as and when there are any changes to the same.	
Criteria 1.2			
The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>A Policy entitled 'Code of Business Conduct & Ethics' dated 11 May 2015 is available and verified. Among others, this Policy calls for respect for fair conduct of business and prohibition against bribery. Awareness briefings on this Policy was also held for the contractors and suppliers. This was briefed to the external stakeholders during stakeholder meeting held on 13 November 2019. Interview held with Sasaran Perdana Sdn Bhd's representative (FFB transporter) confirmed his understanding of the Policy,</p> <p>This Policy was also briefed to all employees, in batches, during morning muster and are displayed on notice boards within the estate and mill premises. The training dates at Pamol Kluang Palm Oil Mill were held on 18 July 2019, 11 July 2019 and 12 September 2019. Interviews conducted with contractors, suppliers, mill and estate workers also confirmed their understanding of this Policy. A clause on commitment to IOI's ethical policies are incorporated in all service contracts with third party contractors and suppliers.</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>Among the system in place to monitor compliance and implementation of the policy are:</p> <ul style="list-style-type: none"> - Signing a pledge the Corruption Free Pledge, producing the Gifts and Hospitality Guidelines (IOIC Version 110019); - Whistleblowing policy dated October 2019; - Gifts and Hospitality Guidelines (IOIC Version 110919) - Anti-Corruption and Anti-Money Laundering Policy (IOIC Ver 060919) <p>Additionally, the Legal Department, supported by the IOI Compliance Officer would be responsible for implementing and enforcing the Policy. This includes:</p>	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<ul style="list-style-type: none"> - Ensuring that all relevant parties are informed about this policies and guidelines; - Define workflows, clear directives on financial approving authorities, and standard procedure instructions; - Processes to be reviewed on a regular basis to ensure they are adapted to the shifting business environment; - Diligent record-keeping and regular audits. 	
Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies with applicable legal requirements.	Pamol Kluang Palm Oil Mill: <ul style="list-style-type: none"> - MPOB license (FFB, PK, CPO & SPO) # 500040104000; Max (FFB) processing capacity: 288,000mt; Validity period: 1/4/2019-31/3/2020 - DOE License # 004723; Compliance Schedule Ref. # AS(B)J 31/1/152/000/048Jld.6(13); Processing capacity: 60mt/hr; POME final Discharge BOD: 20mg/l; Method: Water course & land application (furrow) Facultative pond BOD: 100mg/l; Validity period: 1/7/2019-30/6/2020 - Furrow bund maintenance report 6-monthly to DOE; ensured not to discharged directly to river - Application for extension of time to comply with final discharge BOD limit approval letter by DOE; Letter ref. # AS(B)J 31/152/000/048 Jilid6(23); Date: 4/9/2019; BOD limit: 100mg/l; Facultative pond # 3 BOD limit: 5000mg/l; Validity period: 1/7/2019-31/12/2019 - Application for license to contravene of EQ (Clean Air) Reg. 2014 stack emission limit; Letter ref. # (B) 31/152/000/048 Jilid6(21); Date: 2/9/2019; Compliance schedule ref. # 005349; Stack emission limit: 230.88mg/m³ (Chimney # 1); 155mg/m³ (Chimney # 2); Validity period: 5/6/2019-5/6/2020 	Major noncompliance

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<ul style="list-style-type: none"> - Jabatan Bomba dan Penyelamat Malaysia Negeri Johor certificate of registration as an Emergency Response Team (ERT); Cert. # 17/2019; Validity period: 20/1/2019 – 21/1/2022 - BAKAJ River Abstraction or Diversion License # 08/A/Klg/055; File # BAKAJ/334/300/05/07/08/18; Max volume: 1700m3/day; Expiry date: 31/12/2019 - Energy Commission Installation Acknowledgement; Serial # 007320/2019; Installation # ST(SJB)P/S/JHR/00128; Power aggregate: 3400kW; Validity period: 10/8/2019-9/8/2020 - SPAN Water Services Industry (Licensing) Regulations 2007; License Class # SPAN/JKSP/PT/800-4(1)/9/09; Validity period: 31/5/2018 – 30/5/2021 - Schedule Control Goods Permit Ref. # BPGK JH (KLU) 0273 SK; Serial # P:J/KLU000058; Items: Diesel; Quantity: 18,000 litres; Validity: 28/3/2019 - 27/3/2020 - Certificate of Attendance (Chua Seng Wei; Assistant Mill Manager) Course for Certified Environmental Professional in Scheduled Waste Management (CePSWaM) by IEMAS; Date: 25-29/6/2018## - Certificate of Competence (Ganesan a/l Murupumolia; Lab Supervisor) as Competent Person Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent (CePPOME); Serial # CePPOME/184183; Validity period: 31/5/2018-31/5/2019## - Authorised Gas Tester & Entrant Supervisor (Chua Seng Wei; Assistant Mill Manager) Registration # HQ/19/AGTES/01/03181; Validity period: 16/1/2019-12/1/2022 <p>Pamol Barat Estate – as per Evaluation of Licenses & Permits (SPO: 2.2; Appendix: 1.0; Rev. 1B; Effective date:1/1/2019); Operating Centre: Pamol Barat Estate; Updated license available as following:</p> <ul style="list-style-type: none"> - Air compressor CF # JH PMT 13793; Validity: 26/8/2019 – 25/11/2020 - MPOB license (SLGBIJI) # 540404011000; Validity period: 1/7/2019 – 30/6/2020 	
--	--	--	--

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<ul style="list-style-type: none"> - MPOB license (FFB) # 504177802000; Validity period: 1/6/2019 – 31/5/2020; Estate area: 2316 ha - Schedule Control Goods Permit Ref. # BPGK JH (KLU)013/18/SK2; Serial # J 038284; Items: Petrol (RON 95); Quantity: 200 litres; Validity: 16/9/2019 - 15/3/2020 - Schedule Control Goods Permit Ref. # BPGK JH (KLU) 2209 SK; Serial # J 000502; Items: Diesel; Quantity: 18,000 litres; Validity: 28/10/2019 - 27/10/2020 - Registration certificate # Q 1967; Date: 23/3/2009 <p>Permit & licenses samples for Swee Lam Estate:</p> <ul style="list-style-type: none"> - Schedule Control Goods Permit Ref. # KPDNKK.J-JB/26/5A/11/262 (P/D) (P11); Serial # J 001234; Items: Diesel; Quantity: 13,600 litres; Items: Petrol; Quantity: 100 litres; Validity: 28/6/2019 -27/6/2020 - MPOB license (FFB) # 617329002000; Validity period: 1/5/2019 – 30/4/2020; Estate area: 1,572.11 ha - Air compressor CF # JH PMT 13143; Validity: 29/10/2019 – 28/1/2021 - SPAN Water Services Industry (Licensing) Regulations 2007; Permit # SPAN/EKS/(PT)/800-2A(2)/01/17/(20); Validity period: 18/7/2018 – 17/8/2020 - BAKAJ River Abstraction or Diversion License # 07/A/JB/080; File # BAKAJ/334/300/05/01/07/02; Max volume: 60m3/day; Expiry date: 31/12/2019 <p>However, there was evidence that a female worker at the Pamol Kluang Palm Oil Mill who worked night shifts has not been receiving:</p> <ol style="list-style-type: none"> a. Shift allowance; and b. 11 hours continuous rest before she re-commenced her work. <p>The above are the conditions set by the Department of Labour when it granted the Pamol Kluang Palm Oil Mill an exemption via a letter dated 15 March 2019, (Ref BHG PU/9/135 Jld 18(5)). The conditions states:</p> <ul style="list-style-type: none"> - Paragraph 2 (iii): Receive 11 hours continuous rest before she re-commences work; and 	
--	--	---	--

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<p>- Paragraph 2 (vi): Paid shift allowance in accordance with the collective agreement.</p> <p>Objective evidence shows that on the above dates, the working hours of Worker No. 2609 at Pamol Kluang Palm Oil Mill were as follows:</p> <table border="1" data-bbox="952 555 1921 738"> <thead> <tr> <th>Date</th> <th>OT working hours</th> <th>Time start work the next day</th> <th>Rest hours</th> </tr> </thead> <tbody> <tr> <td>16 May 2019</td> <td>4.00PM to 12.00AM</td> <td>7.00AM</td> <td>7 hours</td> </tr> <tr> <td>17 May 2019</td> <td>4.00PM to 11.00PM</td> <td>7.00AM</td> <td>8 hours</td> </tr> <tr> <td>18 May 2019</td> <td>4.00PM to 12.00AM</td> <td>7.00AM</td> <td>7 hours</td> </tr> <tr> <td>10 June 2019</td> <td>4.00PM to 11.00PM</td> <td>7.00AM</td> <td>8 hours</td> </tr> </tbody> </table> <p>For sample worker with Employee ID # 2609:</p> <ol style="list-style-type: none"> 1. Re-commenced work without having 11 hours continuous rest. This is not in compliance with the terms and conditions imposed by the Labour Department Peninsular Malaysia via paragraph 2 (iii) of the letter Ref BHG PU/9/135 Jld 18(5) dated 15 March 2019. 2. Was not paid shift allowance. This is not in compliance with the terms and conditions imposed by the Labour Department Peninsular Malaysia via letter Ref BHG PU/9/135 Jld 18(5) dated 15 March 2019 (paragraph 2 (vi)) and Article 41 (a) of the IOI Group of Companies/AMESU Agreement 2018 of the MAPA Agreement states that an employee working the second shift is entitled to RM4.70 <p>Therefore, a Critical Non-Compliance was raised under Indicator 2.1.1.</p>	Date	OT working hours	Time start work the next day	Rest hours	16 May 2019	4.00PM to 12.00AM	7.00AM	7 hours	17 May 2019	4.00PM to 11.00PM	7.00AM	8 hours	18 May 2019	4.00PM to 12.00AM	7.00AM	7 hours	10 June 2019	4.00PM to 11.00PM	7.00AM	8 hours	
Date	OT working hours	Time start work the next day	Rest hours																				
16 May 2019	4.00PM to 12.00AM	7.00AM	7 hours																				
17 May 2019	4.00PM to 11.00PM	7.00AM	8 hours																				
18 May 2019	4.00PM to 12.00AM	7.00AM	7 hours																				
10 June 2019	4.00PM to 11.00PM	7.00AM	8 hours																				
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and regulations.	<p>Pamol Barat Estate – as per Mechanism For Tracking Changes In Law; rev. April 2019 as following:</p> <ul style="list-style-type: none"> - Subscribed to Lexis –Nexis Advance Malaysia - News release through printed and online newspaper - By book publisher (MDC Book Publications) and Federal Government Gazette 	Complied																				

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<ul style="list-style-type: none"> - Circulars from relevant associations e.g. MPOA, MPOB, MAPA, SOCSO, EPF, DOE, DOSH, HQ and etc. <p>Estate listed the Legal Requirement Register; latest Dated May 2019. Person in-charge i.e. Legal Compliance Officer was Mr. Mohamad Ali Bin Idrus; Assistant Manager of PBE as per letter of Appointment as Environmental Liaison Officer for Pamol Barat Estate; Date 1/9/2019. Also appointed was Mr. Zainal Abidin Bin Norhazam; Assistant Manager as per letter of Assignment as Legal Liaison Officer for Pamol Barat Estate; Date: 1/9/2019. Latest inclusion recorded in List of Revision as following:</p> <ul style="list-style-type: none"> - Minimum Wages Order 2018; replacing MWO 2016 - 2/3/2019 - Employees' Social Security Act 1969; SOCSO contribution for foreign workers – 2/3/2019 - OSHA 1994; OSH (Noise Exposure) Reg. 2019 – 2/5/2019 - FMA 1967; Revocation of FM (Noise Exposure) Reg. 1989 – 2/5/2019 <p>Swee Lam Estate person in-charge as per letter of Assignment as Liaison Officer; Ref. # SLE/MLA/011/10-18; Date: 24/10/2018 for Mr. Mohd. Zul Aizat bin Ramli, Assistant Manager.</p> <p>Pamol Kluang POM person in-charge as per letter of Assignment as Liaison Officer; Date: 10/5/2018 for Mr. Chua Seng Wei, Assistant Manager.</p>	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	As per SOP on Sustainability IOI Group Estate Boundary and Block Marking; SOP 4/2; Issue/rev. 1/1b; Date: 1/7/2019 – 2.0 Standard Procedure of Field/Block Boundary Marking – Compulsory Marking sighted at all visited estate within the vicinity of their field boundaries.	Complied
Criteria 2.2			
All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained.	As per sample in Pamol Barat Estate Stakeholder List – Contractors as following:	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<ul style="list-style-type: none"> - JCB (En. Suman a/l Gopal) - FFB Transporter (En. Mohd. Saien) - EFB Transporter (En. Ramachandran) 	
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p>	<p>Legal due diligence for contracted third parties including verification of contractors business license as per sample:</p> <ul style="list-style-type: none"> - SSM Borang E (Kaedah 13) Perakuan Pembaharuan Pendaftaran Akta Pendaftaran Perniagaan 1956 of Eng Earthworks Construction (Estate field work contractor); Reg. # JM0086103-D; Validity: 2/3/2018 – 1/3/2021 - SSM Borang E (Kaedah 13) Perakuan Pembaharuan Pendaftaran Akta Pendaftaran Perniagaan 1956 of Suman JCB Enterprise (Estate machine rental); Reg. # JM0913052-P; Validity: 19/8/2019 – 18/8/2020 - Evidence of authorised recruitment agency; Letter Ref. # 089/PPP/I/2019; Keputusan Menteri Ketenagakerjaan Republik Indonesia Nomor 58 Tahun 2019 Tentang Perubahan Surat Izin Pelaksana Penempatan Tenaga Kerja Indonesia Pada PT Primadaya Pratama Pandukarya; Date: 30/4/2019 for Recruitment Agency (PT Primadaya Pratama Pandukarya) 	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p>	<p>As per IOI Group Additional Requirements for Contractors and Service Providers; Reviewed date: 9/4/2019 which requires contractors are to be aware and comply with all applicable local, national and ratified international laws and regulations including sustainability requirements (e.g. RSPO, RSPO Next, MSPO, ISCC etc.). Contract addendum also specifying terms for young workers employed but no clauses on disallowing child, forced and trafficked labour</p>	Complied
<p>Criteria 2.3 All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder 	<p>Pamol Kluang POM processed own cops only and no FFB sourced from third party. All FFB sent to Pamol Kluang POM are from own supply base among Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam Estates.</p>	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

	<ul style="list-style-type: none"> • One or more supporting documents for claims • Valid MPOB license 		
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	This indicator is not applicable since FFB is strictly and only sourced from IOI owned estates.	Complied
PROCEDURAL NOTE:			
For Implementation Procedure for 2.3.2 refer to Annex 4.			
Principle 3: Optimise productivity, efficiency, positive impact and resilience			
Implement plans, procedures and systems for continuous improvement.			
Criteria 3.1			
There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	As per Pamol Barat & Swee Lam 5 Years Business Plan consists of the following: <ul style="list-style-type: none"> - Area Statement (Hectares); Budget for the year 2019/2020 - 2023/2024 - 5 Years Business Plan: Area Statement (Hectares) Actual, Estimate & Projection FY 2019/2020 – FY 2023/2024 - 5 Years Business Plan: Crop Statement BY Year of Planting Actual, Estimate & Projection FY 2019/2020 – FY 2023/2024 - 5 Years Business Plan: FFB Monthly Seasonal Breakdown Actual, Estimate & Projection FY 2019/2020 – FY 2023/2024 - 5 Years Business Plan: Executive/Staff and Labour Requirement FY 2019/2020 – FY 2023/2024 	Complied
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	- 5 Years Business Plan: 10 Year Replanting Programme Summary FY 2019/2020 – FY 2023/2024 (Hectares); Revised date: 18/1/2019	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<ul style="list-style-type: none"> - 5 Years Business Plan: Schedule of Estate Replanting Programme in Summary FY 2019/2020 – FY 2023/2024 (Hectares): Total replanting FY 2019/2020: 203 ha (Field # PM 88A – 88E) <p>No replanting program for up to FY 2028/2029 due to potential urban development plan for Swee Lam Estate. Existing earliest planted palms were PM88B, PM91A, PM91B, PM91C, PM92A, PM93A and PM93B.</p>	
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	<p>As per Pamol Barat Estate Management Review Meeting; Date: 18/10/2019 attended by Estate Manager, Assistant Managers and Sustainability Staff. Review included the results of Internal audit as per Internal Audit Report Pamol Barat Estate 25/9/2019 and Internal Audit Checklist – Sustainability Documentation (Estate); SOP: 1.7; Appendix 1.0; Rev. 1e; Effective date: 10/9/2019</p> <p>Swee Lam Estate Internal Audit Report; Date: 12/9/2019</p> <p>Pamol Kluang POM management review meeting was conducted on 20/11/2019.</p>	Complied
<p>Criteria 3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	<p>Pamol Barat Estate Continuous Improvement Plan for Year 2019:</p> <ul style="list-style-type: none"> - As per Social impact assessment, management action plans and continuous improvement plans 2015-2020; date prepared 17/11/2015; date of 4th reviewed: 17/11/2019 To conduct activities such as futsal, volleyball badminton with workers: to strengthen relationship between employee and employer - AP Quarters – to build 2 unit of AQ Quarters - As per environmental management reviewed October 2019, environmental future continuous improvement plan for pesticide reduction, waste reduction, water management and fossil fuel efficiency 	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	As per ACOP Monitoring Record –Water Consumption; SOP 5.4; Appendix: 6.0; Rev. 2A; Effective date: 1/10/2018	Complied
<p>PROCEDURAL NOTE for 3.2.2: THE RSPO metrics template is awaiting decision/ agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p>			
<p>Criteria 3.3 Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	As per IOI Group Standard Operating Procedures (StOPs) for Estate Operations; Dated September 2007 covering all operation in estates and Standard Operating Procedure on Sustainability; Dated May 2108 currently under development available for Correspondences Regional Meeting, Management Review, Internal Audit, Land Title, Traceability, Annual Sustainability Program and etc. expected to complete on year 2020.	Complied
3.3.2	A mechanism to check consistent implementation of procedures is in place.	Through evaluation of compliance via internal audit by sustainability department, plantation controller periodical visit, mill controller periodical visit and company director visit.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	Records available as per sample: <ul style="list-style-type: none"> - Visit by Plantation Director NB Sudhakaran; Date: 17/5/2019; Visit by Plantation Controller A. Prakash; Date: 10/7/2019. - Visit by Mill Controller Mohamad bin Hashim; Date: 6/11/2019 	Complied
<p>Criteria 3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>	<p>Based on interviews conducted, documents reviewed and observations made during field visits, there is no evidence of any new plantings being carried out within the Pamol Kluang certification unit.</p> <p>Each operating unit has its own Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA) reports which are duly documented. The assessments were carried out internally by the IOI Sustainability Team.</p> <p>All the SIAs and EIAs were done in a participatory manner as evidenced by records of meetings and consultations held. The assessments covered social and environmental impacts of all major activities of its operating units on the stakeholders. The stakeholders include workers, local communities, neighbouring plantations suppliers and contractors.</p> <p>There is no smallholder/outgrower scheme within the certification unit. However, issues of concern raised by the stakeholders were recorded in the Social Impact Assessment & Time Bound Plan Action Plan, and tabulated.</p>	<p>Complied</p>
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p>	<p>Each operating unit has its own EIA and SIA reports, respectively. Any issues of concern that have been identified during participatory stakeholder meetings/consultations are recorded in the Social Impact Assessment & Time Bound Plan Action Plan.</p> <p>Sampled during the audit was Swee Lam Estate’s Social Impact Assessment Management Action Plans and Continuous Improvement Plans 2015 – 2020. This document was prepared on 20 Nov 2015, and the action plans are being reviewed annually. The last review was done on 16 to 19th November 2019. The Management Action Plans and Continuous Improvement Plan were prepared by the Sustainability Team and reviewed on 16th to 19th November 2019. The Action Plan comprise issues discussed and raised in the following stakeholder meetings: Joint Consultative Committee meeting on 25 Feb 2019 and 22 April 2019, and Gender Committee Meeting on 26 March 2019 and 25 June 2016. Stakeholder participation of the Action Plan was evidenced by meeting attendance lists of internal stakeholder</p>	<p>Complied</p>

		<p>meetings held on 8 Nov 2019, and external stakeholder meeting held on 11 Nov 2019.</p> <p>The Environmental Management and Monitoring Plans for Swee Lam Estate was also prepared by the internal Sustainability Team. The plan identified main mill and estate operations, waste and pollutants, HCVs, and affected stakeholders. Mitigation measures were identified and tabulated to include main activities, types of impacts, management control/management plan, person-in-charge and time line for implementation.</p> <p>Both management and monitoring plans for social and environment are being updated on an annual basis, and the last update was in November 2019.</p>	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Based on records available, there is evidence that the Social and Environmental Management and Monitoring Plans are being updated annually. The updates were done in November 2016, November 2017, November 2018 and November 2019.	Complied
Criteria 3.5			
A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and made available to the workers and their representatives where applicable.	<p>Employment procedures are available and documented. For foreign workers, the certification unit is bound by the IOI Plantation’s Foreign Workers Recruitment Guidelines & Procedure in Malaysia dated October 2017, signed by the Plantation Director and revised in July 2018. It covers topics such as no payment of recruitment fee, orientation and health screening, provisions of basic items, renewal of work permits and termination. This is further reiterated by the IOI Group’s Sustainability Palm Oil Policy under Human Rights and Workplace which states that the responsible recruitment practices include not charging recruitment fees at any stage in the recruitment process.</p> <p>For local workers, the relevant SOP is the Employment Procedures for Local Workers (Recruitment, Selection and Hiring) which stipulates procedures for job application, documents to be submitted, necessary skills, aged 18 years above, interview session, selection, pass medical examination and issuance of offer letter.</p>	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

3.5.2	Employment procedures are implemented and records are maintained.	<p>There is evidence that the employment procedures for local and foreign workers enumerated under 3.5.1 are being implemented, and employment records are maintained. At Pamol Barat Estate, sampled were records of employment for an Auxillary Police which contains the local employee’s application form, details of qualifications, medical certificate, and letter of offer.</p> <p>An internal memo dated 26 March 2018 states that in compliance with the company’s policy on No Recruitment Fee, Bangladeshi workers who arrived from June 2017 onwards, and who had paid recruitment fee to recruitment agents, would be reimbursed the official recruitment cost of RM1,550. Evidence of its implementation is available from sampled payslips for 6 Bangladeshi workers for October and November 2019 which showed RM1,550 was paid.</p>	Complied
<p>Criteria 3.6 An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p>C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>HIRARC (Hazard Identification, Risk Assessment and Risk Control) Register had been established, documented and implemented at all Operating Units (OU) as means to identify hazards, analyse and assess its associated risk and then apply the suitable control measures. DOSH HIRARC Guideline 2008 was used by the IOI Safety & Health Department, Peninsular Malaysia with consultation input from respective OU Assistant Manager (Estate and Mill) to guide them in developing the Register.</p> <ul style="list-style-type: none"> Collectively all estates guided by the Sustainability Team, Peninsular Malaysia jointly assessed and documented risks for 47 work activities for estate operations from land preparation, planting FFB all the way to transporting FFB to mill. It also included supporting activities like workshop, electrical works, office works, gardening, etc. The HIRARC Register just developed was then discussed and reviewed during each Operating Unit (OU) OSH Committee meeting for relevancy and/or to update the register following occurrence of any accident. The generic Register common for all estates was last reviewed at 	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<p>Pamol Barat Estate on 27.02.201 and at Swee Lam Estate on 5.10.2019 following an accident (hit an axe at buffalo cart) that happened on 2.10.2019.</p> <ul style="list-style-type: none"> Likewise, all mills in Peninsular Malaysia, again led by the same Sustainability Team had on 1.3.2019 assessed and documented risks at 25 Process workstation covering from FFB reception to product dispatch. For each activity assessed there was control measure(s) recommended. At Pamol Kluang POM it was last reviewed on 5.9.2019 following an accident that happened on 2.5.2019. <p>In addition to HIRARC, Chemical Health Risk Assessment (CHRA) was completed as shown in table below:</p> <table border="1" data-bbox="958 767 1794 963"> <thead> <tr> <th>CHRA</th> <th>Pamol Kluang POM</th> <th>Pamol Barat Estate</th> <th>Swee Lam Estate</th> </tr> </thead> <tbody> <tr> <td>Date conducted</td> <td>19.04.2019</td> <td>22.03.2019</td> <td>20.3.2019</td> </tr> <tr> <td>Assessor DOSH Registration No.</td> <td>HQ/04/ASS/00/193</td> <td>HQ/04/ASS/00/193</td> <td>HQ/04/ASS/00/193</td> </tr> </tbody> </table> <p>Note: For Pamol Barat Estate, CHRA Assessor recommended that Rat Baiter undergo Medical Surveillance. PBE has plan to send 6 Rat Baiter before the start of Rat Baiting Program planned for early December 2019.</p> <p>Besides HIRARC and CHRA associated mitigation plans such as use of PTW, valid Certificated Equipment and Machineries, employment of Competent Person and for those entering confined space health clearance certificate from DOSH-Registered OHD were undertaken by the Operating Unit assessed.</p>	CHRA	Pamol Kluang POM	Pamol Barat Estate	Swee Lam Estate	Date conducted	19.04.2019	22.03.2019	20.3.2019	Assessor DOSH Registration No.	HQ/04/ASS/00/193	HQ/04/ASS/00/193	HQ/04/ASS/00/193	
CHRA	Pamol Kluang POM	Pamol Barat Estate	Swee Lam Estate												
Date conducted	19.04.2019	22.03.2019	20.3.2019												
Assessor DOSH Registration No.	HQ/04/ASS/00/193	HQ/04/ASS/00/193	HQ/04/ASS/00/193												
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	At all OU their performance measurement on the effectiveness of H&S plan that address risk to people were monitored as follows:	Complied												

RSPO Public Summary Report
Revision 9 (Nov 2019)

		Item	Pamol Kluang POM	Pamol Barat Estate	Swee Lam Estate		
		Date of internal Audit by Sustainability Team	26.9.2019 (audit) 22.11.2019 (followup verification for closure of NCR)	25.9.2019 (audit) 23.10.2019 (followup verification for closure of NCR)	12.9.2019 (audit) 15.10.2019 (followup verification for closure of NCR)		
		HSE Department Visit	2x /year 12.9.2019 21.10.2019	2x /year 11.9.2019 4.11.2019	2x/year 30.9.2019 6.11.2019		
		OSH Committee Workplace Inspection	4x/year 11.10.2018 10.1.2019 16.4.2019 04.7.2019	4x/year 28.1.2.2018 22.3.2019 28.6.2019 26.9.2019	4x/year 18.12.2018 25.3.2019 20.6.2019 19.9.2019		
		Mill / Plantation Controller Visit	3x/year 15.1.2019 25.2.2019 6.11.2019	5x/year 9.1.2019 12.2.2019 9.7.2019 12.9.2019 6.11.2019	5x/year 5.3.2019 13.4.2019 17.5.2019 12.7.2019 7.11.2019		
		Medical Surveillance	1x/year	1x/year at various dates	1x/year		

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		OSH Plan accomplishment review	21.10.2019	4.11.2019POM	6.11.2019		
		<p>Audiometric Test only applicable to Pamol Kluang POM</p> <ul style="list-style-type: none"> • Test date, 4.12.2018 for 106 employees • Results: 92 employees were examined with no hearing abnormality, 14 has Standard Threshold Shift and their Repeat test were conducted in January 2019 except for 1 who went on 11 Feb 2019. From the repeat test 9 were reported with Hearing Impairment 					
		<p>Reports produced from each visit by the assigned party were verified available and comments for correction or corrective action and improvement were noted actioned accordingly by the OU.</p>					
<p>Criteria 3.7</p>							
<p>All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>							
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p>	<p>Formal training program for the year 2019 was prepared in December 2018 for the new financial year. They were sighted available at Pamol Kluang POM, Pamol Barat Estate and Swee Lam Estate.</p> <p>The training program covers all aspects of RSPO P&C including supply chain and traceability.</p> <p>Program for the 2019 have been implemented. Regular assessment of on-the-job training conducted to ensure understanding among the employees.</p>				Complied	
3.7.2	<p>Records of training are maintained.</p>	<p>All employees and contractors were provided training related to their job skills and RSPO P&C requirements including supply chain and traceability. They training program include productivity and best management practice subjects on estates operating procedures as well as procedural matters caring for Occupational Health</p>				Complied	

& Safety and Environmental, from felling of oil palm trees, nursery, replanting, harvesting and upkeep of fields to evacuation of FFB to mill.

Likewise, at the mill it covers from FFB receipt, grading, processing to Crude Palm Oil, storage and dispatch of CPO, nut kernel and the management of by-products, wastes and waste streams.

The training program specified the target group of employees to be trained for the identified subjects. In addition to the Good Mill /Agricultural Practice training, that is, Process stations / field SOP related to trade/job skills, the following topics, among others, were included in the 2019/20 annual training program.

Pamol Kluang POM		
Training subjects	Date	No. of Attendees
Emergency Response / Fire Drill	26.07.2019	64
First Aid for all workers	08.11.2019	35
Schedule waste disposal	26.03.2019 & 23.9.2019	6 5
RSPO & ISCC for Managers/Executives	24.01.2019	3
Personal Protective Equipment	11.11.2019	39
SOP – Chemical Handling	19.07.2019	9SOP
SOP - Electrical	17.09.2019	5
SOP – Reception / Grading	18.11.2019	6
SOP – Sterilizer/Threshing & Press/ Oil Room / Nut & Kernel	22 & 27 .03.2019	12

RSPO Public Summary Report
Revision 9 (Nov 2019)

SOP – Boiler / Engine driver	14.02.2019	7
SOP – Lab, Effluent, WTP, Biogas	19.10.2019	9
SOP – Office, Weighbridge	19.09.2019	6
Confine Space	07.08.2019	9
Working at Height	09.09.2019	3

Training Subject	Pamol Barat		Swee Lam	
	Date in 2019	Atten dees	Date in 2019	Atten dees
RSPO & ISCC for Managers /Executives	24.01	3	31.05	4
Personal Protective Equipment	11.11	16	18.10	13
SOP – Chemical Handling Store / Premixing	29.08	3	04.03	3
SOP – Tractor Driving & Transport	20.06 07.09 15.11	17 18 5	10.01 03.07	8 10
SOP - Workshop Operations	27.03	2	04.09	2
SOP – Chemical Sprayers	24.01 31.05 18.11	12 20 29	28.03 14.05	12 16
SOP - Manuring	26.01 10.09	10 9	12.03 17.10	7 7
SOP - Harvesting	16.02 22.03	6 11 14 24	24.01 15.02	8 10 16 25

RSPO Public Summary Report
Revision 9 (Nov 2019)

			27.06 18.09		26.06 10.10		
		SOP – Buffalo harvesting	26.02 28.06 18.09	22 14 24	24.04 05.11	15 15	
		SOP - Loading	15.11	5	07.05	6	
		SOP - Nursery	15.07	14	-	-	
		SOP – Planting Palm Tree	12.01 18.10	22 24	-	-	
		Emergency /Fire Drill	03.11	All	05.07	All	
		First Aid	27.08	8	13.06	10	
		IPM –Rat Census and Baiting	21.08	6	27.07	13	
		IPM – Barn Owl Management	28.03	6	27.07	13	
		IPM – Beneficial Plant	22.05	6	07.08	15	
		Buffer zone	24.01	8	10.04	7	
		HCV and Wildlife	25.05	6	27.03	98	
		Schedule Waste Management	26.03	10	04.03	2	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Records viewed showed Supply Chain training (Critical Control Point) was given to the assessed Operating Unit as below:					Complied
		Operating Unit	Date	No. of Attendees			
		Pamol Barat Estate	04.09.2019	14			
		Swee Lam Estate	14.11.2019	10			

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		Pamol Kluang POM	19.09.2019	16	
Employees trained include Assistant Manager, staff and clerk.					
Criterion 3.8					
Supply chain requirement for mills (note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)					
3.8.1	<p>Definition Identity Preserved Mill D.1:</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>FFB were obtained from all IOI's certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.</p>			Complied
3.8.2	<p>Definition Mass Balance Mill E.1</p> <p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill</p>	<p>Not applicable as Pamol Kluang POM applied Identity Preserve (IP) supply chain module.</p>			Not applicable

	can claim only the volume of oil palm products produced from processing of the certified FFB as MB		
3.8.3	<p>Explanation (Volume and product integrity) – D.2, E.2</p> <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p> <p>RSPO Membership of Pamol Kluang Palm Oil Mill is under IOI Corporation Berhad with RSPO Membership No. 2-0002-04-000-00 since 17/5/2004.</p> <p>RSPO Palmtrace Member ID: RSPO_PO1000000109 (Pamol Plantations Sdn Bhd – Pamol Kluang Palm Oil Mill) which license expires on 15/3/2020.</p>	Complied
3.8.4	<p>Documented procedures – 5.3.1, D.3, E.3</p> <p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>Complete and up-to-date procedures covering the implementation of all the elements of the supply chain model requirements.</p>	<p>Pamol Kluang POM implemented the supply chain of Standard Operation Procedure Title: CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies; Doc. # RSPO/SOP/COC/3; Issue # 09; Date/; 7/5/2019</p>	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

	<p>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p>	<p>Complete up to date records and reports available as part of daily implementation of supply chain as following:</p> <ul style="list-style-type: none"> - Pamol Kluang Palm Oil Mill Month End Production Report - IP Mass balance spreadsheet - CSFFB Quality Report - Pamol Plantations Sdn. Bhd. Palm Oil Mill Daily Production Report; A2. Mill Daily Production Report sample date of report: 1/11/2019 for production data of October 2019 as following: <ul style="list-style-type: none"> o October 2019 Month to date (MTD) FFB Received: 23,036.15mt o October 2019 MTD CPO production: 5,486.844mt (OER: 23.82%) o October 2019 MTD PK production: 1,062.445mt (KER: 4.61%) 	
	<p>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</p>	<p>Identified overall person in-charge as per letter of Appointment as RSPO & MSPO Supply Chain Officer for Pamol Kluang Palm Oil Mill; Date: 10/11/2017 of Mr. Chua Seng Wei, Assistant Mill Manager. Other person involved in the implementation of supply chain including Lab Supervisor, Lab Operators, FFB Graders, Auxiliary Police, Weighbridge Operators and Office Clerks. Latest training was conducted for all personnel involved on 19/9/2019 by the overall person in-charge together with mill manager and assistant mill managers. Training program as per Sustainability Program For The Year 2019 (Pamol Kluang Palm Oil Mill) including Critical Control Point (CCP) for executive and related personnel on 19/9/2019.</p>	
	<p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>The mill received only certified crops from own supply base. However the Procedure Title: CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies; Doc. # RSPO/SOP/COC/3; Issue # 09; Date; 7/5/2019 has been included with procedures for receiving and processing certified and non-certified FFBs under paragraph 5.4 Handling RSPO Products and 5.5 Downgrading and Mass Balance Traceability.</p>	
<p>3.8.5</p>	<p>Internal Audit – 5.3.2</p>	<p>Procedure of internal audit has been included in Procedure Title: CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies; Doc. # RSPO/SOP/COC/3; Issue # 09; Date; 7/5/2019 under paragraph 5.1</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <p>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Internal Audit. Also included 5.2 Handling Complaints and 5.3 Handling Non-Conformities.</p>	
	<p>Effectively implements and maintains the standard requirements within its organisation.</p>	<p>Latest internal audit was conducted on 26/9/2019 as per Pamol Palm Oil Mill 2019 Chain of Custody & Supply Chain Certification Internal Audit Report. A total of 8 nonconformities were raised by internal auditors were taken action and verified to be effective and closed by internal auditors on 21/11/2019.</p>	
	<p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>	<p>All findings were discussed during the management review meeting conducted on 20/11/2019.</p>	
3.8.6	<p>Purchasing Goods In – 5.4, D.4.1/ D.4.2, E.4.1/E.4.2</p> <p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p>	<p>As per sample FFB received tickets as following:</p> <ul style="list-style-type: none"> - Supplier: Pamol Timur Estate; Weighbridge ticket # FB19004074; Date: 27/11/2019; Net weight: 5,650kg; Block: PM11B; Vehicle # WXE538 - Supplier: Pamol Barat Estate; Weighbridge ticket # FB19004072; Date: 27/11/2019; Net weight: 4,450kg; Block: PM16E; Vehicle # VAR7334 - Supplier: Kahang Estate; Weighbridge ticket # FB19004077; Date: 27/11/2019; Net weight: 43,010kg; Block: 01AB, 02E, 03AB; Vehicle # PGQ2757 	Complied
	<p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>The site has informed and requested for volume extension for the projected overproduction.</p>	
	<p>The site shall have a mechanism in place for handling non- conforming oil palm products and/or documents.</p>	<p>Mechanism available as per procedure above.</p>	

<p>3.8.7</p>	<p>Outsourcing Activities – 5.5 In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing. This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	<p>No process outsourcing except for transportation only as per sample agreement sighted as following:</p> <ul style="list-style-type: none"> - Agreement for Transport of Crude Palm Oil between Makmur Transport Sdn. Bhd. and Pamol Plantations Sdn. Bhd.; Date: 25/9/2019; Agreement Period: 1/9/2019 – 31/8/2021 - Agreement for Transport of Crude Palm Oil between Yewtan Enterprise Sdn. Bhd. and Pamol Plantations Sdn. Bhd.; Date: 25/9/2019; Agreement Period: 1/9/2019 – 31/8/2021 - Agreement for Transport of Crude Palm Oil between Sasaran Perentas Sdn. Bhd. and Pamol Plantations Sdn. Bhd.; Date: 25/9/2019; Agreement Period: 1/9/2019 – 31/8/2021 	<p>Complied</p>
	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ol style="list-style-type: none"> a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. 	<p>Transporters has no legal ownership of products as specified in agreements sighted above. No process outsourcing except for transportation only as above.</p>	

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

	<p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>		
	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>No process outsourcing except for transportation only as above.</p>	
	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>No process outsourcing except for transportation only as above.</p>	
<p>3.8.8</p>	<p>Record keeping – 5.9</p> <p>The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.</p>	<p>Complete up to date records and reports available as part of daily implementation of supply chain as following:</p> <ul style="list-style-type: none"> - Pamol Kluang Palm Oil Mill Month End Production Report - IP Mass balance spreadsheet - CSFFB Quality Report - Pamol Plantations Sdn. Bhd. Palm Oil Mill Daily Production Report; A2. Mill Daily Production Report sample date of report: 1/11/2019 for production data of October 2019 as following: <ul style="list-style-type: none"> o October 2019 Month to date (MTD) FFB Received: 23,036.15mt o October 2019 MTD CPO production: 5,486.844mt (OER: 23.82%) o October 2019 MTD PK production: 1,062.445mt (KER: 4.61%) 	<p>Complied</p>
	<p>Retention times for all records and reports shall be a minimum of two(2) years and shall comply with legal</p>	<p>SOP Title: CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses and Trading Companies; Doc. # RSPO/SOP/COC/3; Issue # 09; Date;/ 7/5/2019</p>	

	<p>and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>	<p>was developed has defined the retention time for all the records and documents is minimum period of 2 years.</p>	
	<p>The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.</p>	<p>Estimated volume available for period for Nov 2019 – Oct 2020 as following:</p> <ul style="list-style-type: none"> - CSFFB: 246,509.00 mt - CSPO: 59,219.00 mt - CSPK: 11, 969.80 mt 	
	<p>D.5.1 – The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. Or E.5.1 –</p> <ul style="list-style-type: none"> a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/or three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. <p>The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)</p>	<p>All the inventory records are maintained and updated on daily basis and monthly. Daily records are prepared at the entry point at the weighbridge.</p>	

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

3.8.9	<p>Conversion Factors – 5.10 Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org)</p> <p>Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Average OER and KER for period of Nov 2018 – Oct 2019 were 24.17% (OER) & 4.70% (KER).</p> <p>Conversion factor calculated on daily basis and updated for weekly, monthly and annually basis figures.</p>	Complied
3.8.10	<p>Processing – D.6 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.</p>	No non-certified product since Pamol Kluang POM applied IP module.	Complied
3.8.11	<p>Sales and goods out – 5.6 The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity 	<p>Information available as per samples sighted as following: CSPO sales contract:</p> <ul style="list-style-type: none"> - Sales Contract Ref. # C17148/1910; Buyer: IOI Global Services Trading Sdn. Bhd.; Commodity: Crude Unbleached Palm Oil In Bulk; Commodity Brand: ISCC-EU/RSPO-IP; Quantity: 250.00mt <p>Despatches samples:</p> <ul style="list-style-type: none"> - Weighbridge ticket # CP19000308; Date: 31/10/2019; Product: 100000001 CPO-Certified Sustainable Palm Oil; Net weight: 32,590kg; Vehicle # NAJ1011/TN2768 	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

	<p>Preserved, Segregated or Mass Balance or the approved abbreviations);</p> <ul style="list-style-type: none"> • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). <p>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments.</p>	<p>- Weighbridge ticket # CP19000307; Date: 31/10/2019; Product: 100000001 CPO-Certified Sustainable Palm Oil; Net weight: 33,470kg; Vehicle # JTN6278/TNA2809</p> <p>CSPK sales contract:</p> <p>- Sales Contract Ref. # C16112/1901; Buyer: Premium Vegetable Sdn. Bhd.; Commodity: Palm Kernels; Commodity Brand: RSPO/IP; Quantity: 100.00mt</p> <p>Despatches samples:</p> <p>- Weighbridge ticket # 23424; Date: 8/1/2019; Product: PK Certified Sustainable Palm Kernel; Net weight: 41,990kg; Vehicle # JKF4452/TJ8882</p> <p>- Weighbridge ticket # CP19000307; Date: 31/10/2019; Product: 100000001 CPO-Certified Sustainable Palm Oil; Net weight: 33,470kg; Vehicle # JTN6278/TNA2809</p>	
3.8.12	<p>Registration of Transactions – 5.7</p> <p>Supply chain actors who:</p> <ul style="list-style-type: none"> • Are mills, traders, crushers and refineries; and <p>Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</p> <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p>	<p>The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit’s Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p> <p>Based on the announcement (transaction) summary, all the registrations were found to be in order.</p>	Complied

	<p>Shipping Announcement/Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure2 and 3, refer Annex 1) shall be registered as a Shipping Announcement/Announcement in the RSPO IT Platform. time to do Shipping Announcement/Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements/Announcements.</p>		
3.8.13	<p>Claims – 5.11</p> <p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has obtained Trademark License from RSPO and seen the trademark license# 2-0002-04-100-03 which valid from 19/12/2017 to 18/12/2019.</p>	Complied
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1</p>			

The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>The Pamol Kluang certification unit subscribes to IOI Group’s Sustainable Palm Oil Policy dated March 2018. This Policy states that the Company respects and uphold the rights of all workers, including contract, temporary and migrant workers in accordance with the following:</p> <ul style="list-style-type: none"> a. Universal Declaration of Human Rights b. International Labour Organization’s core conventions c. United Nations Guiding Principles on Business and Human Rights d. Principles of Free and Fair Labour in Palm Oil Production. <p>Part of the United Nations Guiding Principles on Business and Human Rights which the IOI Group’s Sustainable Palm Oil Policy refers to affirms that the legitimate and peaceful activities of Human Rights Defenders are not obstructed.</p> <p>The Policy is being displayed at the notice boards within the certification unit. Evidence is available that the awareness briefings have also been given to all levels of workforce during morning muster at Swee Lam Estate (3 September 2019) and Pamol Barat Mill (18 July 2019, 11 July 2019, 12 September 2019).</p> <p>The IOI Group Sustainable Palm Oil Policy states that it upholds the rights of all workers in accordance with, inter alia, the United Nations Guiding Principles on Business and Human Rights. Clause 26 of this Guiding Principles mentions that legitimate and peaceful activities of human right defenders are not obstructed.</p> <p>As an opportunity for improvement, a specific reference to prohibiting retaliation against Human Rights Defenders is specifically documented in the IOI Group Sustainable Palm Oil Policy so that this can be clearly communicated and made understood to all operating units. hence, an OFI has been raised on the matter.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p>	<p>There is no evidence of any use of violence or the instigation of violence within the Pamol Kluang certification unit. This was further verified during interviews held with external stakeholders as well as local communities from Kg Pengkalan Tereh.</p>	Complied

Criteria 4.2			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>The Pamol Kluang Complex is bound by the Company's Standard Operating Procedure known as "Grievance Procedure (Section 7.0)".</p> <p>The procedure includes the mechanism of receiving, recording and addressing any complaints/grievances from affected parties. The Kluang Pamol certification unit keeps a Grievance/Complaints Book, known as the Green Book which is accessible to and can be filled in by workers, staff and external stakeholders. The aggrieved parties could either:</p> <ul style="list-style-type: none"> a. Fill in the complaint form in the Green Book; b. Submit the complaint verbally to anyone in the main office, or to the responsible official on social issues; c. Submit complaint of the workers' representatives or gender representatives who would then fill in the complaint form on their behalf. <p>The IOI Group's Whistle Blowing Policy which was revised in November 2017 ensures anonymity of complainants or whistle-blowers.</p> <p>IOI Group also adopts the United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labour in Palm Oil Production. Part of this document affirms that the legitimate and peaceful activities of Human Rights Defenders are not obstructed.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>Briefings on the procedures are given to ensure that the system is understood by affected parties. Translators from among the workers (such as experienced mandores) are sought to translate documents including procedures for dealing with complaints and grievances to those who are not conversant in the language, and to those who are illiterate.</p>	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

		Records were sighted of briefings given at Swee Lam Estate (3 September 2019) and at Pamol Barat Estate (22 November 2019). An evaluation form is used to gauge their level of understanding. If it was found that the workers have not understood what was briefed, a repeat of the same briefing would be done. It was verified during interviews with workers that they understood the procedures for dealing with complaints and grievances.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	Apart from complaints about house repairs, there has been no other grievances recorded at any of the Pamol Kluang certification unit. Any complaints brought to the attention of respective unit is attended to promptly, often on the same day, or the next. Evidence is available at Lam Swee Estate that the workers were informed that their request raised at the Joint Consultative Committee meeting held on 9 October 2019 for a new clothes line is being attended to and that the materials have been ordered.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	The IOI Group's Negotiation Procedure SOP 2.0 & 6.0 Appendix 2 Issue 1 Rev 0 dated 17 Jan 2017, stipulates the option of identifying parties' self-chosen representative who can provide independent legal & technical advice. Additionally, parties are able to appoint a mediator in cases of social conflicts between management and workers. Sighted during the audit was a letter appointing a social mediator signed by workers' representative of Pamol Barat Estate dated 11 November 2019.	Complied
Criteria 4.3			
The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	It has been demonstrated that the Pamol Kluang certification unit contributes to community development based on results of consultations with the affected communities. The Pamol Barat Estate maintains Hindu and Buddhist temples located within the estate premises. These temples were used many years ago by previous workers,	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<p>and are now continually being used by their descendants even if they are no longer working and living in the Pamol Barat Estate. Sighted during the audit were:</p> <ul style="list-style-type: none"> a. Letter from Datuk Tay Loke Khoon Temple dated 14 October 2019 addressed to the Manager of Pamol Barat Estate seeking permission to allow the devotees to enter the estate premises on 9 and 10th November; b. Letter dated 14 May 2019 sent by the Chairman of Sri Subramaniam Temple to the Manager, Pamol Estate seeking permission to celebrate a religious event on 1st and 2nd June 2019 at the temple. The letter also requested that street lights within the estate to be turned on, to open the main gate on 1st and 2nd June 2019, and a request for the Pamol Barat Estate auxiliary police to assist with patrolling during the 2-day event. These applications were approved and granted by the estate management. c. Letter dated 23 October 2019 from SJK (Tamil) Ladang Pamol seeking permission to have an educational visit to the Mill on 6 Nov 2019 for 11 teachers and 53 pupils. Approval for this visit was given by the Mill management and verified during the audit; <p>Letter from the Headmaster of SK Ladang Pamol dated 19 Aug 2019 seeking assistance from the Pamol Barat Estate to repair the school water pipe. Repair work commenced on 20 August 2019 and was completed on 21 August 2019.</p>	
<p>Criteria 4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>Documents showing legal ownership available as per sample sighted as following: Pamol Barat Estate Areas Statement as at 31/10/2019: Total mature: 1,156 ha (56.64%) Total immature: 999 ha (46.36%) Total gross area: 2,310.09 ha Total title area: 2,310.32 ha</p>	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<p>A total of 6 titles shared with Pamol Timur Estate as following samples:</p> <ul style="list-style-type: none"> - Title # 88885; Mukim Kluang; Area: 808.1572 ha; Reg. date: 30/11/2002 - Title # 94673; Mukim Kluang; Area: 859.957 ha; Reg. date: 15/2/2006 - Title # 56272; Mukim Kluang; Area: 2050.1393 ha; Reg. date: 31/3/1997 <p>Latest quit rent payment sample receipt # B 0672446; Date: 22/5/2019</p> <p>Swee Lam Estate Areas Statement as at 29/10/2019: Total mature: 1,098 ha (100.00%) Total immature: 0 ha (0.00%) Total other area: 522.05 ha Total gross area: 1,620.05 ha Minus (Property development) area: 459.09 ha Total title area: 1,160.96 ha</p> <p>A total of 7 titles as following samples:</p> <ul style="list-style-type: none"> - Title # HSD 406893; Mukim Senai-Kulai; Area: 86.7954 ha; Reg. date: 28/2/2006 - Title # HSD 406899; Mukim Senai-Kulai; Area: 416.6189 ha; Reg. date: 28/2/2006 - Title # HSD 406895; Mukim Senai-Kulai; Area: 207.1838 ha; Reg. date: 28/2/2006 <p>Latest quit rent payment sample receipt # B 0925066; Date: 27/5/2019</p>	
--	--	--	--

<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Pamol Kluang Certification Unit. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.</p>	<p>Complied</p>
<p>b) Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Pamol Kluang Certification Unit. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.</p>		
<p>c) Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Pamol Kluang Certification Unit. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.</p>		
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land within Pamol Kluang Certification Unit. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's</p>	<p>Complied</p>

RSPO Public Summary Report
Revision 9 (Nov 2019)

		companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Evidence of documentations and stakeholder consultation shown that no customary land within Pamol Kluang Certification Unit. The lands are country leased land and provisional lease to IOI Corporation Bhd. Sighted the land titles for both sampled estates. The surrounding areas owned by smallholders and other plantation's companies. There's no evidence of land encroachment within Pamol Kluang Certification Unit for both mill and estates.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Based on documentation review and interviews with local community from Kg Pengkalan Tereh and nearby plantations, there is no evidence of any land conflicts, or claims for legal or customary rights against the Pamol Kluang certification unit. Therefore, this Indicator is not applicable.	N/A
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Based on documentation review and interviews with local community from Kg Pengkalan Tereh and nearby plantations, there is no evidence of any land conflicts, or claims for legal or customary rights against the Pamol Kluang certification unit. Therefore, this Indicator is not applicable.	N/A
Criteria 4.5			
No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.8	(C) Newlands are not acquired in areas inhabited by communities in voluntary isolation.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
Criteria 4.6			
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	IOI Corporation Berhad has developed IOI Peninsular Malaysia Negotiation Procedure to identify the legal, customary or user rights of land. The flowchart has detailed all the process of the negotiation process. Additionally, Grievance Procedure for Land Owner Issue has also been established. The procedure is applicable for the grievances from landowners to IOI and vice versa. IOI Peninsular Malaysia Land Use Compensation Procedures Flow Chart was developed to describe the complaint cases and compensation process if required.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and	IOI Corporation Berhad has developed IOI Peninsular Malaysia Negotiation Procedure to identify the legal, customary or user rights of land. The flowchart has	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

	implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	<p>detailed all the process of the negotiation process. Additionally, Grievance Procedure for Land Owner Issue has also been established. The procedure is applicable for the grievances from landowners to IOI and vice versa. IOI Peninsular Malaysia Land Use Compensation Procedures Flow Chart was developed to describe the complaint cases and compensation process if required.</p> <p>However, since there is no claim for legal, customary or user rights, and no compensation is payable, no corrective actions have been taken.</p>	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	Pamol Kluang Palm Oil Mill is an IP Mill and only obtains FFB from its own supply base. It does not engage with any engage with any smallholders and therefore this Indicator is not applicable.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	It has been verified during documentation review, interviews held with management, local communities, and field observations that there is no evidence of any claims or disputes pertaining to legal, customary or user rights. Therefore, there is no documentation on any negotiated agreements, compensation and payments made.	Complied
Criteria 4.7			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	A mutually agreed procedure for identifying people entitled to compensation is in place. IOI Peninsular Malaysia Negotiation Procedure has been developed to identify the legal, customary or user rights of land. The flowchart details out the negotiation processes involved.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or	A mutually agreed procedure for calculating and distributing fair compensation identifying people entitled to compensation is documented in the IOI Peninsular	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

	otherwise) is in place and documented and made available to affected parties.	Malaysia Negotiation Procedure which has been developed to detail out the procedure for calculating and distributing fair compensation.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	It has been verified during documentation review, interviews held with management, local communities, and field observations that there is no evidence of any claims or disputes pertaining to legal, customary or user rights. Therefore, there is no evidence of any community that have lost access and rights to land for plantation expansion of the Pamol certification unit.	Complied
Criteria 4.8			
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	It has been verified during documentation review, interviews held with management, local communities, and field observations that there is no evidence of any existing or previous disputes involving the the Pamol Kluang certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any customary land rights. Land titles and ownerships of the lands were available.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	It has been verified during documentation review, interviews held with management, local communities, and field observations that there is no evidence of any existing or previous land conflict involving Pamol Kluang Palm certification unit. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any customary land rights. Land titles and ownerships of the lands were available.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using	It has been verified during documentation review, interviews held with management, local communities, and field observations that there is no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. The estate lands are legally owned by	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

	the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)	IOI Corporation Berhad. The existing estates are not encumbered by any customary land rights. Land titles and ownerships of the lands were available.	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	It has been verified during documentation review, interviews held with management, local communities, and field observations that there is no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. The estate lands are legally owned by IOI Corporation Berhad. The existing estates are not encumbered by any customary land rights. Land titles and ownerships of the lands were available.	Complied
Principle 5: Support smallholder inclusion			
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1			
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Not applicable
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders (at least once a year or upon request).	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Not applicable
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Not applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Not applicable

	reductions for replanting and or other support mechanisms where applicable.		
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>The Estates and Mill have entered into various contracts with third parties (excluding smallholders) and each contract has an agreed time frame. Pamol Barat Estate, Swee Lam Estate and Kluang Pamol Palm Oil Mill entered into contracts with transporters to transport FFB from the estates to the Mill; EFB from the Mill to estates; and CPO from the Mill to refineries. Sighted during the audit was the contract signed between IOI Plantations Services Sdn Bhd and Sasaran Perentas Sdn Bhd. The contract has a fixed duration of three years, from 1 September 2019 to 31 August 2022.</p> <p>Another contract sighted was a contract dated 1 January 2018 between Pamol Kluang Estate and Lee Hock Yam and Juang Haufor as a canteen operator for a period of 2-years. The contracts will expire on 31 Dec 2019.</p> <p>A review of the terms and conditions of the contract show that the contracts are fair, legal and transparent. Each contract details out the rights and obligations of each party, reasons for termination, and a clear contract sum and price calculation mechanism. This was also confirmed by the contractors (Sasaran Perentas Sdn Bhd, Mr Ramachandran, and Mr Mohd Saïen) and canteen operator during audit interview.</p>	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Based on interviews held with contractors, payments are made within two weeks to one month of issuance of invoice. Transporters are also issued a receipt which shows gross weight, tare weight, deductions if any, and the net weight of the FFB/EFB/CPO.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Evidence is available that weighing equipment at the Pamol Kluang Palm Oil Mill is being verified annually by an independant third party. Sighted during the audit were Forms D (Weights and Measures) dated 29 July 2019 (Serial No. 1449102) and 29 July 2018 (Serial No. 1449103) issued by the Metrology Corporation Malaysia Sdn Bhd.	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Complied
Criteria 5.2			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Complied
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder or RSIS).	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Complied

5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	The Pamol Kluang Palm Oil Mill is an IP Mill and only receives FFB from its own supply base estates. Therefore, the Pamol Kluang certification unit is not involved with any smallholders in any of its operations.	Complied
<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1 Any form of discrimination is prohibited.</p>			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	<p>A Policy entitled Equal Opportunity Employment and Freedom of Association Policies is available and displayed at the main notice boards and at the workers' housing. The Policy states that there will be no discrimination based on race, national origin, religion, gender, union membership and age.</p> <p>Interviews held with local workers (male, female) and foreign workers (male) within the Pamol Kluang certification unit, confirmed that there is no discrimination and that they are given equal opportunities to enjoy the medical, housing and other benefits such as use of amenities accorded by the Company.</p>	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.	Based on interviews with workers within the Pamol Kluang certification unit, documents sighted and observations made, there is no evidence that there has been any form of discrimination against any employee, or group of employees. All workers interviewed (local, foreign, male and female), payment of wages/salaries, provision of housing and access to benefits and amenities is fair and available to all.	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

		Review of pay checks and employment also confirm that all workers irrespective of nationalities, gender, religion, etc, are accorded the same living standards and accommodations.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Interviews with the estates and mill management, as well as documentation review of interview assessment and medical report, the Pamol Kluang certification unit has demonstrated that the recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. As practiced within the certification unit, candidates submit their application forms followed by interview assessment and medical check-up. Annual appraisal forms are used to determine the employee's skills and capabilities. An employment process was sighted as well as the employee's Total Performance Management System dated 15 Sept 2017.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	There is no evidence that pregnancy tests are being conducted as a discriminatory measure. Pregnancy test is required to determine for Foreign Workers' Medical Examination (FOMEMA). During this audit period, there is no record of any pregnant female workers.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	A Gender Committee (GC) is in place at each Estate and Mill at the Pamol Kluang Pamol certification unit. The GC comprise female employees and spouses of male workers. Based on the minutes of meetings and interviews held with the GC committee members at Swee Lam Estate and Pamol Kluang Palm Oil Mill, the GC is set up to create awareness and disseminate information to its members on matters pertaining to sexual harassment, reproductive rights, complaints channel in sexual and abuse cases. Meeting minutes dated 12 June 2019 was sighted at Pamol Barat Estate.	Complied

6.1.6	There is evidence of equal pay for the same work scope.	Interview held with three General Workers at Swee Lam Estate, followed by a review of their payslips for the months of Feb, April and August 2019 demonstrate that each general worker doing the same work scope receive equal pay.	Complied
<p>Criteria 6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p>	<p>Details of payments and conditions of employment are stated and documented in the Letters of Employment given to all workers and staff at the Pamol Kluang certification unit. The documents are prepared in dual-language, i.e. English and another language that the worker is conversant in (either Hindi, Bengali, or Bahasa). The contract stipulates terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave and public holidays, mutual termination of contract, facilities, etc. The documents are signed by the Human Resources Manager and the worker, and dated.</p> <p>The following employment contracts were sampled and verified to be valid and current, duly signed and witnessed:</p> <p>Pamol Kluang Palm Oil Mill:</p> <ul style="list-style-type: none"> ➤ Worker No. PMM 0219 employment contract dated 26 October 2018 (English & Hindi) for 3 years; ➤ Worker No. PMM0073 employment contract dated 1 April 2017 (Bahasa Malaysia) for 3 years; ➤ Worker No. PMM 0178 employment contract dated 8 November 2019 (English) for 3 years <p>Pamol Barat Estate:</p>	Complied

		<ul style="list-style-type: none"> ➤ Worker No. 2792 employment contract dated 18 Jan 2014 (English & Hindi) for 3 years and extended annually accordance to the work permit; ➤ Worker No. 2070 employment contract dated 18 October 2016 (English & Hindi) for 3 years and extended annually accordance to the work permit; ➤ Worker No. 2072 employment contract dated 1 July 2016 (English & Hindi) for 3 years and extended annually accordance to the work permit. <p>Interviews conducted with the workers confirmed that they understand the employment contracts and that it was explained to them.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p>	<p>All the employment contracts sampled detail out payments of wages (minimum RM42.31 per day, or RM1,100 per month). The document also states that regular working hours is 8 hours per day, payment and calculation of overtime work, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. The terms of these conditions comply with the provisions of the Employment Act 1955.</p> <p>Also sighted were payslips for the following workers for the months of February, April and August 2019.</p> <p>Pamol Kluang Palm Oil Mill:</p> <ul style="list-style-type: none"> ➤ Worker No. PMM 0219; ➤ Worker No. PMM 0073; ➤ Worker No. PMM 0178 <p>Pamol Barat Estate:</p> <ul style="list-style-type: none"> ➤ Worker No. 2792; ➤ Worker No. 2070; ➤ Worker No. 2072 	OFI

		<p>Swee Lam Estate:</p> <ul style="list-style-type: none"> ➤ Worker Passport No. L2066189; ➤ Worker Passport No. N7235760; ➤ Worker Passport No. AU 154122. <p>The payslips specify clearly the type of work done, month of pay, worker identity, Social Security Number, income, sundry job wages, paid public holiday, advance received, deductions (water and electricity supplies), net pay, offered number of days, days of absent, medical leave, etc.</p> <p>There is no evidence that the workers’ family members assist in their work.</p> <p>However and opportunity for improvement (OFI) has been raised on the following:</p> <p>1. All foreign workers sign their employment contracts with Human Resource Manager, Plantation. The contracts are prepared in Bahasa Malaysia for the Indonesian workers. For workers from India, Bangladesh, etc, they sign on 2 different and separate documents; namely:</p> <ul style="list-style-type: none"> a) contract in English, and b) contract in the language they understand (e.g. Hindi). <p>The current practice sees both parties signing on a document they don’t understand. For example, the Indian worker does not understand the English version of the agreement, and the Human Resource Manager does not understand the Hindi version of the contract. As an opportunity for improvement, both a) and b) can be combined into one document so that both parties sign on a document they both simultaneously understand.</p> <p>2. In cases where the workers are illiterate, the operating units get a translator to explain the employment contracts to the foreign workers. As an opportunity for improvement, such translation be recorded and acknowledged.</p>	
--	--	--	--

		<p>3. Foreign workers signed a New/Amended Terms and Conditions of Employment Contracts (January 2019) to incorporate changes in employment terms such as payment of minimum wages and mutual termination clauses, among others. For improvement, these documents should be dated so that its duration is clear.</p>	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	<p>The certification unit has demonstrated its compliance with legal requirements on the following issues:</p> <ul style="list-style-type: none"> a. Regular working hours: Workers interviewed confirmed that they work 6 days in a week, and their normal working hours is 8 hours per day. This is further stipulated in their employment contracts signed between the workers and the Company. Employment contracts were sampled for the following workers: <u>Pamol Kluang Palm Oil Mill:</u> <ul style="list-style-type: none"> ➤ Worker No. PMM 0219; ➤ Worker No. PMM 0073; ➤ Worker No. PMM 0178 <u>Pamol Barat Estate:</u> <ul style="list-style-type: none"> ➤ Worker No. 2792; ➤ Worker No. 2070; ➤ Worker No. 2072 <u>Swee Lam Estate:</u> <ul style="list-style-type: none"> ➤ Worker Passport No. L2066189; ➤ Worker Passport No. N7235760; ➤ Worker Passport No. AU 154122. b. Overtime: The Labour Office has issued the Pamol Kluang Palm Oil Mill with a permit (Ref BHG.PU/9/134 Jld 19(9) dated 26 Feb 2019 for overtime exceeding 104 hours per month. Another permit is the exemption of women 	<p>Complied</p>

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<p>to work from 10.00PM to 5.00AM under S34 Employment Act 1955 (Ref No. BHG.PU 9/135 Jld 18 (5) dated 15 March 2019.</p> <p>c. Deductions: Compliance with the legal requirements was evidenced when salary deductions are made with permits from the Labour Office as follows: <u>Advance:</u> Permit letter to Plantation Division, IOI Corporation Berhad dated 6 Jan 2004 (Ref:15 dlm BSM7/2/35/30 Jld.2) <u>Electricity:</u> Permit letter to the Pamol Kluang Palm Oil Mill dated 7 Jan 2019 (Ref No. TK(NJ)U-23. Permit letter to the Pamol Barat Estate dated 15 Jan 2019 (Ref No. TK(NJ)U-23. <u>Water:</u> Permit letter to the Pamol Kluang Palm Oil Mill dated 17 February 2019 (Ref No. TK(NJ)U-23). Permit letter to the Pamol Barat Estate dated 16 June 2016 (Ref No. TK(NJ)U-23). <u>Mosque fund:</u> Permit letter to the Pamol Kluang Palm Oil Mill dated 11 Dec 2008 (Serial No. PP3/29/(041/2008).</p> <p>Request form the workers to deduct their salaries for the above payments were also sighted for workers 3138, 3008, 2340, 3099,2375, 2380,2278, 3002, 3001 who signed letters dated 5 October 2018 agreeing to have their salaries deducted.</p> <p>d. Overtime: Overtime is carried out with the consent of the workers, and payment rates for overtime is clearly stipulated in the employment contracts. Sighted during the audit was a consent letter signed by a weighbridge operator at the Pamol Kluang Palm Oil Mill dated 26 December 2017 where she agreed to work overtime.</p>	
--	--	--	--

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<p>e. Sickness, holiday entitlement, maternity leave: These entitlements are also stipulated in the workers' employment contract. Interview with the workers also confirmed that they are entitled to a paid medical leave certified by the HA/doctor, and that they are able to take holidays and maternity leave.</p> <p>f. Mutual termination of contract is also provided for in the employment contracts, where each party can give the other 14 days' notice in writing to terminate the employment.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years)is allowed to upgrade the infrastructure.</p>	<p>The Pamol Kluang certification unit has demonstrated that adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities are being provided to the workers. This is in accordance with the Workers' Minimum Standard of Housing and Amenities Act 1990. Interviews, field visit and documentation review show that workers are given clean and comfortable houses. The houses at the linesite have 2 rooms, supplied with either water from Syarikat Air Johor, or treated water from its own source. Some houses at Swee Lam Estate are in need of a new coat of painting. Evidence was sighted that under Budget 2019/2020 a sum of RM5,700 has been approved for painting of 20 units of houses. Linesite inspections are carried out once a week by the MA, sometimes together with the Visiting Medical Officer (VMO).</p> <p>Workers are also accorded free medical facilities either at the estate/mill, or clinics and government hospitals. The VMO, Dr Senthil Kumar from Klinik Githa, visits the clinics once a fortnight.</p> <p>Other amenities available include recreational facilities, football field, badminton court, sundry shops and canteen, temples and mosques.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>It has been demonstrated that all the units under Pamol Kluang Palm Oil Mill supply base that efforts are made to ensure workers' access to adequate, sufficient and affordable food. This was evident by the presence of canteens or sundry shops near</p>	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<p>the workers' housing area. These shops sell sufficient supply of daily requirements such as rice, flour, eggs, sugar, milk, cooking oil, frozen food, beverages, toiletries, etc. The price of each item is clearly marked, and they differ slightly between cash and credit purchases. Workers interviewed confirmed that the items sold in the shops are reasonably priced. On-site observations reveal the food items sold are adequate and within their expiry dates. Price list of items sold are provided to the Bukit Leelau Estate regularly for purposes of monitoring.</p> <p>At Swee Lam Estate, there is also evidence that meeting with the sundry shop was held on 28 June 2019, and prices are being regularly monitored and compared with prices at other shops in town.</p>	
6.2.6	<p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p>	<p>As of the date of this audit, the payment of wages is still based on the minimum wages stipulated under the Minimum Wages (Amendment) Order 2018, which is 42.31 per day, or RM1,100 per month or more. Payslips for Feb, April and August 2019 sighted for workers No. PMM 0219, PMM 0073, PMM 0178 and PMM 0729 confirmed the payment of the minimum wages. As stipulated under the Minimum Wages and Leave Pay Policies in Malaysia, IOI Group will conduct a fair and decent wage assessment of its workers based on a credible methodology with the goal of providing workers a fair and decent wage.</p> <p>The calculation of prevailing wages comprising average monthly wages and benefits in kind is also ongoing as of the date of this audit.</p>	Complied

PROCEDURAL NOTE:

RSPO STANDARD STANDING COMMITTEE
 14th of October 2019

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

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist¹

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

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks¹. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.

For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage¹.

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

- Updated assessment on prevailing wages and in-kind benefits
- There is annual progress on the implementation of living wages
- Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment
- The UoC may choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.

¹ As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam. These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate.

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

² Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country.

³ RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country.

6.2.7	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Based on documentation review, interviews and field observations, there is no evidence that the units within the Pamol Kluang Palm Oil Mill and its supply base employ any casual, temporary and day labour. All employees are employed on either permanent or contractual full-time basis.	Complied
-------	---	---	----------

Criteria 6.3
The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	The published statement recognising freedom of association is available in the Company's Equal Opportunity and Freedom of Association Policy dated October 2017 signed by the Plantation Director. The Policy states that the Company respects freedom of association and collective bargaining and would not refuse any genuine opportunity to collectively bargain with workers who want to do so. This Policy is displayed on all main notice boards and awareness briefings were held at Swee Lam Estate on 3 September 2019. Implementation of the Policy is demonstrated when workers are able to bring issues to the management's attention at the Joint Consultative Committee meetings via their own elected representatives This JCC meeting is held once every two months. At the Pamol Kluang Palm Oil Mill, the JCC meetings were held on 16 November 2019, 12 September 2019, 5 July 2019.	Complied
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages	There is no trade union at Pamol Kluang Palm Oil Mill and its supply base. However, all the Estates and Mill allow workers to choose their own representatives to attend meetings with the management. These meetings are known as the Joint Consultative Committee (JCC) Meetings. The JCC is chaired by the Manager. The	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

	(English and/or Bahasa Malaysia) and made available upon request.	JCC comprise representatives from management and workers. The workers' representatives were nominated through an election process by the workers themselves. The JCC meets once every two months. Migrant workers are able to choose representatives from their own country to sit in the Joint Consultative Committee (JCC) meetings with management representatives. Minutes of JCC meetings dated 12 July 2019 and October 2019 are documented in Bahasa Malaysia and were sighted at Pamol Kluang Palm Oil Mill.	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Workers are free to elect their own representatives to sit in the JCC. Interview conducted with the Indian worker representative at Swee Lam Estate confirmed that management does not interfere with the formation and operations of the Employee Communication Committee (ECC).	Complied
Criteria 6.4:			
Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	The IOI Group has a No Child Labour Policy signed on 5 November 2009 by the IOI Group Plantation Director. Prohibition of child labour is also included in contracts with third parties where the latter is required to sign Additional Requirements for Contractors and Suppliers. Sighted during the audit was the Additional Requirements for Contractors and Suppliers signed by Sasaran Perentas Sdn Bhd, a contractor for the Pamol Kluang Palm Oil Mill, Swee Lam Estate and Pamol Kluang Estate. Clause 1(d) of this document states that contractors and suppliers are to ensure that all employees are at least 18 years of age when employed. Where young workers (16-18 years old) are employed, their contracts for employment includes a clause for their protection (e.g. restrictions on their hours of work, working at dangerous heights, heavy machinery, etc.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company	There was no evidence that the Estates and the Mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' passport and IC and dates of birth are available.	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

	policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.	
6.4.3	(C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.	Based on documents sighted, interviews and observations, there was no evidence that the Estates and the Mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	Evidence is available that the IOI Group Labour Policy was communicated to all levels of workforce during morning muster briefings at Swee Lam Estate (3 September 2019), Pamol Kluang Palm Oil Mill (18 July 2019, 11 July 2019, 12 September 2019) and external stakeholder meeting (13 November 2019).	Complied
Criteria 6.5:			
There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	<p>The company has implemented Policy on Harassment at Workplace dated June 2018. The Policy sets out the Company's commitment to promote a safe and healthy working environment, and zero tolerance for any form of harassment at workplace. The Policy serves as a guidance on handling matters related to harassment, and is being displayed at all the main notice boards.</p> <p>The Policy is also being briefed to all levels of workforce during morning muster at Swee Lam Estate (27 March 2019 and 3 September 2019) and at Pamol Kluang Palm Oil Mill (22 November 2019, 18 July 2019, 11 July 2019, 12 September 2019).</p>	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		Evidence that this Policy is being implemented is available from interviews conducted with female employees at the Mill and Estates who confirmed that there has been no sexual or other forms of harassment.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	IOI Group has a Policy on Protection of Reproductive Rights Policy dated 2 July 2015. This Policy commits the company to provide protection of reproductive rights to all employees. Reproductive rights mean the right to marriage, family formation and determination of the number, timing and spacing of children. The Policy is being displayed at all main the notice boards within the Estates and Mill. Interviews with workers confirmed that this Policy is being implemented in that there is no prohibition from management on the number of children to have, and the spacing. Awareness briefings were held during morning muster to all levels of workforce at Swee Lam Estate (27 March 2019 and 3 September 2019) and at Pamol Kluang Palm Oil Mill (22 November 2019, 18 July 2019, 11 July 2019, 12 September 2019).	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	There are no new mothers at any of the Estates and Mill within Pamol Kluang Palm Oil Mill supply base, therefore, this Indicator is not applicable.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	The IOI Group has developed the Sexual Harassment Reporting Flowchart which is being implemented by to elaborate how the process of sexual harassment complaint can be made. Besides, the company also implemented Policy on Harassment at Workplace where the company will keep all the grievances related to sexual harassment as confidential and the victim can remain anonymous. Gender Committee has been established in the mill and meeting was carried out accordingly.	Complied
Criteria 6.6:			
No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited:	Based on documentation review, interviews held with workers at the estate and mill, (gardeners, harvesters, mandores, lab workers, ramp operator, boiler man,	OFI

	<ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	<p>drivers, etc) and observations, there is no evidence that workers are in a forced employment.</p> <p>Retention of documents: All foreign workers are given the option of whether to keep their own passports, or to keep them inside lockers placed at the office for security purposes. Those who chose to place their passports in the lockers are given a key to the locker. They have also signed a document each to confirm their request to place the passports in the locker. Sighted were letters dated 8 November 2019 from Kluang Pamol Mill Workers No. PMM0219, PMM0073, PMM0178, and PMM0193. Workers from Pakistan and India who interviewed at the Swee Lam Estate linesite also confirmed their preference to keep their passports at the office for security reasons.</p> <p>Charging for recruitment fee: Workers do not pay any recruitment fee. However, those who paid recruitment fee to their agents have been reimbursed by the Company a sum of RM1,550 each. Sighted at Swee Lam Estate were confirmation on refund of recruitment fees of RM1550 to Bangladeshi workers via October salaries: Worker BP0454521, BP0208929, BF0713510, BH0325730, BM0139029, BF0123875.</p> <p>Involuntary overtime: Based on interviews conducted, there is no evidence of involuntary overtime at either the Estates or Mill. Sighted at the Pamol Kluang Mill, was a letter dated 26 December 2017 signed by the weighbridge operator agreeing to work overtime.</p> <p>Lack of freedom of workers to resign: There is no evidence observed of workers being prohibited from resigning. Clause 3(d) of the New/Amended Terms and Conditions of Employment Contracts signed by all workers contains a provision for early termination of the contract where workers can give 14-days termination notice.</p>	
--	--	---	--

		<p>Penalty to workers for termination of employment: Paragraph 3(f) of the New/Amended Terms and Conditions of Employment Contracts signed by all workers states that no penalty will be imposed for premature termination of the employment contract.</p> <p>Debt bondage: Based on interviews with workers, there is no evidence of any form of debt bondage.</p> <p>Withholding of wages: Based on review of the employment contracts and workers' pay slips for February 2019, April 2019 and August 2019, as well as interviews held with the workers, there is no evidence of any wages being withheld from the workers.</p> <p>All foreign workers are given the option of either keeping their own passport at the linesite, or for safety purposes, keep their passports in locked pigeon boxes placed at the office. Most workers are given their own keys to the pigeon boxes. At Swee Lam Estate, because of insufficient number of pigeon boxes and keys, all workers in that house keep their passports together in one pigeon box, and the house leader keeps the key.</p> <p>As an opportunity for improvement, each worker in that house be given a key to the pigeon box. This is to ensure that each of them can have access to their own passports at any time, without relying on the house leader. Hence an OFI has been raised on the matter.</p>	
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.	All the units within Pamol Kluang Palm Oil Mill and its supply base employ foreign workers from Indonesia, Bangladesh, Myanmar, Nepal, Pakistan, India and the Philippines. Therefore, the IOI Group has developed Special Labour Policy and Procedures which emphasise on Equal Opportunity Employment and Freedom of Association, Non-discriminatory practices, and ensuring that there is no contract substitution. The Policy also refers to training to be conducted for all foreign workers upon arrival in Malaysia by using orientation program materials which focuses on	Complied

		<p>language, cultural practices, safety and Malaysia laws. Additionally, the Policy also refers to provision of decent living conditions as per the Worker’s Minimum Standard Housing and Amenities Act 1990 as a guide.</p> <p>There is evidence that this Policy is being implemented as records of induction trainings were sighted at the Kluang Pamol Palm Oil Mill during the audit. This training was held for eight newly-recruited foreign workers with the help of a translator. Evaluation forms were also filled up to gauge the level of understanding. Records of further induction trainings were also sighted at Swee Lam Estate on 14 June 2019, 10 July 2019, 30 August 2019, and 1 October 2019. Further evidence of implementation include the provision of living quarters that comply with the requirements of the Workers’ Minimum Standard of Housing and Amenities Act 1990.</p>																
<p>Criteria 6.7:</p>																		
<p>The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>																		
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>An Assistant Manager at Estate and Mill had been appointed as the site person responsible for Safety and Health. Their appointment letter was verified.</p> <p>In addition to H&S reminders during morning muster at estate or morning meeting at mill, and field/mill rounds interaction with staff and workers, quarterly Occupational Safety and Health Committee meeting were held as follows:</p> <table border="1" data-bbox="958 1134 1585 1399"> <thead> <tr> <th>Pamol Kluang POM</th> <th>Pamol Barat Estate</th> <th>Swee Lam Estate</th> </tr> </thead> <tbody> <tr> <td>11.01.2019</td> <td>28.12.2018</td> <td>18.12.2018</td> </tr> <tr> <td>17.04.2019</td> <td>22.3.2019</td> <td>26.3.2019</td> </tr> <tr> <td>05.07.2019</td> <td>28.6.2019</td> <td>25.6.2019</td> </tr> <tr> <td>10.10.2019</td> <td>26.9.2019</td> <td>24.9.2019</td> </tr> </tbody> </table>	Pamol Kluang POM	Pamol Barat Estate	Swee Lam Estate	11.01.2019	28.12.2018	18.12.2018	17.04.2019	22.3.2019	26.3.2019	05.07.2019	28.6.2019	25.6.2019	10.10.2019	26.9.2019	24.9.2019	<p>Complied</p>
Pamol Kluang POM	Pamol Barat Estate	Swee Lam Estate																
11.01.2019	28.12.2018	18.12.2018																
17.04.2019	22.3.2019	26.3.2019																
05.07.2019	28.6.2019	25.6.2019																
10.10.2019	26.9.2019	24.9.2019																

		<p>Concerns of all parties about health, safety and welfare were discussed at these meetings, and any issues raised were recorded. The meeting minutes were verified. A standard Meeting Agenda was used at all Operating Units that consist of the following:</p> <ol style="list-style-type: none"> 1. Chairman Opening speech 2. Confirmation of Previous Minutes 3. Pending Issues 4. Workplace Inspections 5. Accident Record 6. Training and Program Record 7. Safety Department /DOSH/Other agency findings <p>Any Other Business</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>The procedure for accident and emergency has been established. It is known as Notification and Investigation (Incidents/Accidents & Dangerous Occurrences) summarized in Flowchart Form, updated on 17.05.2017, available in English and Bahasa Malaysia. The flowchart has been explained to the work force and found understood as demonstrated during emergency evacuation and fire drill.</p> <p>There are 8 Emergency Response Plan in Flowchart form. They are:</p> <ol style="list-style-type: none"> 1. 1 Physical Injury updated on 16.10.2018 2. Chemical Spillage at Store updated on 16.10.2018 3. Chemical Spillage at field updated on 16.10.2018 4. Vehicle Accident updated on 16.10.2018 5. Building Fire updated on 16.10.2018 6. Major Spillage – Diesel and Lubricant updated on 16.10.2018 	<p>Complied</p>

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<p>7. Fire in Field updated on 16.10.2018 8. Chemical Poisoning at Store and Field updated on 16.10.2018</p> <p>An Emergency Response team has been formed at each Operating Unit visited. The team were trained as company first responders to isolate, contain and neutralize the incident if it is safe for them to do so. Otherwise, summon the local area emergency service providers whose emergency contact telephone number were posted at office noticeboards and at the guard house.</p> <p>Assigned operatives trained in first aid were present in both field and other operations, and first aid equipment was available at worksites. They were trained by EHA/MA. Inspection of the First aid boxes showed contents and their respective item were up-to-date as required by FMA (Safety, Health & Welfare) Regulation 1990.</p> <p>Records of accident including investigation report, DOSH forms JKPP 6 and JKPP 8 were sighted kept and periodically reviewed.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>Appropriate PPE were given to workers based on HIRARC recommendations suitable for the job position or hazardous operation undertaken. This was verified in the PPE issuance records viewed.</p> <p>Checked and noted during site visit that PPE given were worn correctly by the operators and the condition of each PPE item and their validity lifespan use were found good. Interview of workers showed they know when to change to a new set, either by expiry date or when they are damaged or rendered ineffective to use.</p> <p>The operators had been given training on the use of PPE and SOP for the job they were assigned to work. Please cross refer to indicator 3.7.2</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from</p>	<p>The CU continued to ensure all workers working in their premises (both mill and estates) are covered by insurance. All local and foreign workers were covered by SOCSO as required under the Employee's Social Security Act 1969.</p>	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

	<p>work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p>	<p>The Kluang POM and estates audited no longer subscribed to Foreign Workers Compensation Scheme (FWCS) since 30.9.2019 except at Swee Lam estate whose FWCS had remaining residual validity period. Upon expiry of the insurance coverage period it will automatically be converted to SOCSO Act 1969 (Act 4).</p> <p>In addition to the SOCSO Act 1969, the recently implemented Employment Insurance System Act 2017 (Act 800) had been complied with by the Pamol Kluang Certification Unit. This Act 800 is only applicable to Malaysian employees. Sighted payment had been paid to SCOSO for the month of October dated on 13 and 14 October 2019 for both coverage under Act 4 and Act 800.</p> <p>Shown below are details of payment made:</p> <table border="1" data-bbox="958 783 1814 1292"> <thead> <tr> <th></th> <th>Pamol Kluang POM</th> <th>Pamol Barat Estate</th> <th>Swee Lam Estate</th> </tr> </thead> <tbody> <tr> <td colspan="4">EIS contribution - local employees only</td> </tr> <tr> <td>Employer Code</td> <td>E1200004817B</td> <td>E1200004814W</td> <td>E1100001539P</td> </tr> <tr> <td>Date Paid</td> <td>14.11.2019 for the month of October</td> <td>14.11.2019 for month of October</td> <td>13.11.2019 for month of October</td> </tr> <tr> <td>Receipt No.</td> <td>2019E0004478770</td> <td>2019E0003932199</td> <td>2019E0003903625</td> </tr> <tr> <td>No. of Employees</td> <td>133</td> <td>17</td> <td>13</td> </tr> <tr> <td colspan="4">SOCSO contribution - for both local and foreign workers</td> </tr> </tbody> </table>		Pamol Kluang POM	Pamol Barat Estate	Swee Lam Estate	EIS contribution - local employees only				Employer Code	E1200004817B	E1200004814W	E1100001539P	Date Paid	14.11.2019 for the month of October	14.11.2019 for month of October	13.11.2019 for month of October	Receipt No.	2019E0004478770	2019E0003932199	2019E0003903625	No. of Employees	133	17	13	SOCSO contribution - for both local and foreign workers				
	Pamol Kluang POM	Pamol Barat Estate	Swee Lam Estate																												
EIS contribution - local employees only																															
Employer Code	E1200004817B	E1200004814W	E1100001539P																												
Date Paid	14.11.2019 for the month of October	14.11.2019 for month of October	13.11.2019 for month of October																												
Receipt No.	2019E0004478770	2019E0003932199	2019E0003903625																												
No. of Employees	133	17	13																												
SOCSO contribution - for both local and foreign workers																															

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<table border="1"> <tr> <td>Date Paid</td> <td>14.11.2019 for the month of October</td> <td>14.11.2019 for month of October</td> <td>14.11.2019 for month of October</td> </tr> <tr> <td>Receipt No.</td> <td>20190004478770</td> <td>20190004487251</td> <td>20190004457505</td> </tr> <tr> <td>No. of Employees</td> <td>66</td> <td>206</td> <td>125</td> </tr> </table>	Date Paid	14.11.2019 for the month of October	14.11.2019 for month of October	14.11.2019 for month of October	Receipt No.	20190004478770	20190004487251	20190004457505	No. of Employees	66	206	125										
Date Paid	14.11.2019 for the month of October	14.11.2019 for month of October	14.11.2019 for month of October																					
Receipt No.	20190004478770	20190004487251	20190004457505																					
No. of Employees	66	206	125																					
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>The injuries recorded by the Operating Units assessed were as tabulated below:</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Pamol Barat estate</td> <td>35 cases (22 days LTI)</td> <td>29 cases (38 days LTI)</td> </tr> <tr> <td>Swee Lam estate</td> <td>72 cases (95 days LTI)</td> <td>90 cases (76 days LTI)</td> </tr> <tr> <td>Pamol Kluang POM</td> <td>2 cases (19 days LTI)</td> <td>4 cases (101 days LTI)</td> </tr> </tbody> </table> <p>For accident that occurred in 2019, report sent to DOSH were promptly as per NADOOPOD Regulations 2004 as sighted in the below the sample form JKPP 6 after investigation had been made.</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Accident date</th> <th>Date report sent to DOSH</th> </tr> </thead> <tbody> <tr> <td>Palm Barat Estate</td> <td>10/02/2019</td> <td>12/02/2019</td> </tr> <tr> <td>Swee Lam Estate</td> <td>10/08/2019</td> <td>19/08/2019</td> </tr> </tbody> </table>	Operating Unit	2018	2019	Pamol Barat estate	35 cases (22 days LTI)	29 cases (38 days LTI)	Swee Lam estate	72 cases (95 days LTI)	90 cases (76 days LTI)	Pamol Kluang POM	2 cases (19 days LTI)	4 cases (101 days LTI)	Operating Unit	Accident date	Date report sent to DOSH	Palm Barat Estate	10/02/2019	12/02/2019	Swee Lam Estate	10/08/2019	19/08/2019	Complied
Operating Unit	2018	2019																						
Pamol Barat estate	35 cases (22 days LTI)	29 cases (38 days LTI)																						
Swee Lam estate	72 cases (95 days LTI)	90 cases (76 days LTI)																						
Pamol Kluang POM	2 cases (19 days LTI)	4 cases (101 days LTI)																						
Operating Unit	Accident date	Date report sent to DOSH																						
Palm Barat Estate	10/02/2019	12/02/2019																						
Swee Lam Estate	10/08/2019	19/08/2019																						

RSPO Public Summary Report
Revision 9 (Nov 2019)

			02/10/2019	03/10/2019	
		Pamol Kluang POM	02/02/2019	07/02/20	
			02/05/2019	07/05/2019	
			19/07/2019	22/07/2019	
			30/10/2019	31/10/2019	
<p>At Pamol Kluang POM, those employees exposed to high noise work were sent for audiometric examination. DOSH had been identified accordingly via form JKPP 7 for those found with adverse effect (Permanent Standard Threshold Shift and Noise Induced Hearing Loss)</p>					
<p>Principle 7: Protect, conserve and enhance ecosystem and the environment.</p>					
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>					
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>IPM plans for implementation is guided by IOI Group Standard Operating Procedure (StOP) For Planting of Beneficial Plants Index No. 17.1 dated December 2016 and Group Standard Operating Procedure (StOP) For Integrated Management of Rat Control Index No. 10.1 dated September 2007. Beneficial plants such as Cassia cobanensis, Antigonon leptopus and Tunera subulata were grown in the estates at recommended planting ratio 60:20:20 (CAT) at 20m/ha (i.e 12 m Cassia, 4m Antigonon and 4m Tunera).</p> <p>Records of planting of new areas and maintenance of existing areas of beneficial plants and location maps were available (predator host plant map). A distance of 2500m and 320m along roadside at Pamol Barat Estate and Swee Lam Estate respectively have been planted with beneficial plants.</p>	Complied		

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<p>For Pest & Disease (P&D), census was carried out for rat damage on annual basis. Recent rat census at all estates assessed results showed attack were below threshold limit of 5%. The use of dog hunting (for rats) besides barn owl boxes were also practiced.</p> <p>The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the SOP operation.</p> <p>Training records for staff and workers on IPM implementation were demonstrated. Verified training record at visited estates:</p> <table border="1" data-bbox="958 683 1774 1078"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Topic</th> <th>Attendees</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>Sakilan</td> <td>8.8.2019</td> <td>Pekerja Penanaman Bunga</td> <td>4</td> <td>Field Supervisor</td> </tr> <tr> <td>Linbar 1</td> <td>13.11.2019</td> <td>Beneficial Plant Training</td> <td>4</td> <td>Field Supervisor</td> </tr> <tr> <td>Linbar 2</td> <td>10.5.2019</td> <td>Beneficial Plant Training</td> <td>4</td> <td>Field Supervisor</td> </tr> </tbody> </table>	Estate	Date	Topic	Attendees	Trainer	Sakilan	8.8.2019	Pekerja Penanaman Bunga	4	Field Supervisor	Linbar 1	13.11.2019	Beneficial Plant Training	4	Field Supervisor	Linbar 2	10.5.2019	Beneficial Plant Training	4	Field Supervisor	
Estate	Date	Topic	Attendees	Trainer																			
Sakilan	8.8.2019	Pekerja Penanaman Bunga	4	Field Supervisor																			
Linbar 1	13.11.2019	Beneficial Plant Training	4	Field Supervisor																			
Linbar 2	10.5.2019	Beneficial Plant Training	4	Field Supervisor																			
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Field visits did not find any species referenced in the Global Invasive Species Database and CABI.org. Species found present in managed areas were Clidemia hirta, Melastoma and Hedyotis dominion.	Complied																				
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	The use of fire for pest control is not practised.	Complied																				

Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.						
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	Justification of all pesticides used in the weeding and pest and disease were documented in Agriculture Policies dated July 2005 under section 6.0 Weeding: Weed Control and 9.0 Pest and Diseases. Stated under table 6.2: General Guidelines of Herbicide Mixture for Circle and Path under Shade. They include Glyphosate, Metsulfuron methyl, Triclopyr, , Glufosinate ammonium, Cypermethrin and Diuron			Complied	
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	The records of pesticides used as required by this indicator were available at estates visited, example at Swee Lam:			Complied	
		Chemicals	Glyphosate	Triclopyr	Amine	Fluoxypyr 1 –methyl
		(a.i/ha) 2018	0.22	0.08	0.07	0.03
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Group Standard Operating Procedures (StOPs) for Planting of Beneficial Plan in Estate Index 17.1 dated December 2016 and StoP For Integrated Management of Rat Control Index 10.1 dated Sep 2007 were available to guide the estates to reduce use of herbicides and pesticides. Cassia cobanensis were planted at Swee Lam estate to reduce bagworm infestation in the field. Other initiatives sighted include establishment of <i>nephrolepis</i> and Leguminous Cover Crop, tunera subulata, antigonon and barn owl system			Complied	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	No prophylactic use of pesticides noted during the field visit and records verification. The estates have established the Chemical and Fertiliser reduction plan and reviewed on annually basis.			Complied	
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when	IOI Group has adopted no use of paraquat and pesticides categorized by WHO as class 1A or 1B via a memo/letter signed by Group Plantation Director, dated 23/9/2010 effective by 31/12/2011. Paraquat is totally banned in IOI estate and this was confirmed through interviews with workers as all estates visited had eliminated the use of Paraquat. In its place,			Complied	

	<p>authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. 	<p>alternatives agrochemicals such as Metsulfuron Methyl and Glyphosate Isopropyl Amine were used to control weeds.</p>	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>	<p>Pesticides operators have been provided with proper PPE. Observed during the site visit the PPE usage by the operators such as google, half face respirator, nitrile hand glove, rubber boot and apron were obediently followed.</p> <p>Records showed that pesticides were handled, used and applied by trained persons and as per the Safety Data Sheet (SDS) of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained (cross reference indicator 3.7.2 above) and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that the SDS were available at all sites chemical pre-mixing area and chemical store during the audit.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p>	<p>The operating units comply with Occupational Safety and Health (CLASS) Regulation 2013 and Regulation 9 of the Pesticides Act 1974. It requires a current valid SDS for the chemical being used with all information about the chemical made known to</p>	Complied

		<p>handlers and newly purchased ND balance of remaining solution to be kept under lock and key.</p> <p>During visit it was noted that:</p> <ul style="list-style-type: none"> a. Record of the purchase, storage and use had been properly maintained. b. All stores were secured under lock and key with restricted access. c. Only authorized personnel was allowed to handle the chemicals. d. All the chemicals were stored and segregated accordingly by class. e. Store keeper was trained in the handling all pesticides. f. Provision of ventilation fan and lighting. g. Secondary containment tray placed underneath containers to contain leaks, if any. h. All precautionary measures such as the need to use required PPE, Chemical Safety Hazard pictograms and SOP to enter the store were posted at entrance to store. i. Chemical SDS in English language and Bahasa Malaysia and environmental spill kit were kept handy inside the store. j. Concrete cemented floor, bund wall and provision of sump pond. 	
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Empty pesticides containers had been triple rinsed, holes punched in them and stored separately as recycle waste. They were collected by authorized vendor, that is, OLST Petro Chemical Sdn Bhd, a Kualiti Alam registered contractor with DOE	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	No Aerial spraying was carried out at both Pamol Barat and Swee Lam estates.	Complied

7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>Medical surveillance 3 September 2019 by Total attend by 32 workers and all fit to work with chemical.</p> <p>Medical Surveillance resulting from CHRA was carried out once a year by engaging an OHD DOSH- Registration No. (HQ/08/DOC/00/597) from Klinik Renggam, Kluang.</p> <p>Following category of workers from the assessed Operating Units were examined by the OHD. Various dates of OHD examination in batches (new Sprayers added) took place:</p> <table border="1" data-bbox="974 746 1765 1367"> <thead> <tr> <th>Date</th> <th>Job Title</th> <th>No. workers examined</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td colspan="4">Pamol Barat Estate</td> </tr> <tr> <td rowspan="4">16.4.2019</td> <td>Premixer cum Store keeper</td> <td>1 }</td> <td rowspan="4">All Fit To Work</td> </tr> <tr> <td>Sprayer</td> <td>1 }</td> </tr> <tr> <td>Workshop Attendant</td> <td>6 }</td> </tr> <tr> <td></td> <td>2 }</td> </tr> <tr> <td>17.7.2019</td> <td>Sprayer</td> <td>5</td> <td>All Fit To Work</td> </tr> <tr> <td>18.9.2019</td> <td>Sprayer</td> <td>11</td> <td>All Fit To Work</td> </tr> <tr> <td colspan="2">TOTAL</td> <td>35</td> <td></td> </tr> <tr> <td colspan="4">Swee Lam Estate</td> </tr> <tr> <td>11.7.2019</td> <td>Sprayer</td> <td>6 }</td> <td>All Fit To Work</td> </tr> </tbody> </table>	Date	Job Title	No. workers examined	Remarks	Pamol Barat Estate				16.4.2019	Premixer cum Store keeper	1 }	All Fit To Work	Sprayer	1 }	Workshop Attendant	6 }		2 }	17.7.2019	Sprayer	5	All Fit To Work	18.9.2019	Sprayer	11	All Fit To Work	TOTAL		35		Swee Lam Estate				11.7.2019	Sprayer	6 }	All Fit To Work	Complied
Date	Job Title	No. workers examined	Remarks																																						
Pamol Barat Estate																																									
16.4.2019	Premixer cum Store keeper	1 }	All Fit To Work																																						
	Sprayer	1 }																																							
	Workshop Attendant	6 }																																							
		2 }																																							
17.7.2019	Sprayer	5	All Fit To Work																																						
18.9.2019	Sprayer	11	All Fit To Work																																						
TOTAL		35																																							
Swee Lam Estate																																									
11.7.2019	Sprayer	6 }	All Fit To Work																																						

			<table border="1"> <tr> <td>Store Keeper</td> <td>1</td> <td>}</td> </tr> <tr> <td>Workshop Attendant</td> <td>2</td> <td>}</td> </tr> <tr> <td>Tractor Driver</td> <td>1</td> <td>}</td> </tr> <tr> <td colspan="2" style="text-align: center;">TOTAL</td> <td>23</td> </tr> </table>	Store Keeper	1	}	Workshop Attendant	2	}	Tractor Driver	1	}	TOTAL		23		
Store Keeper	1	}															
Workshop Attendant	2	}															
Tractor Driver	1	}															
TOTAL		23															
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	All chemical handlers at Pamol Barat and Swee Lam Estate are male workers. The list of sprayers was sighted and were maintained by both estates.			Complied												
Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.																	
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	<p>Each Operating Unit assessed continued to review and update its established Waste Management Plan. With the guidance from Sustainability Team, each Operating Unit last updated the Plan jointly during October 2019.</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> <ul style="list-style-type: none"> Collection/disposal minimum 2x/week. Establish collection SOP, schedule & PIC Create awareness on hygiene Monitoring of line site </td> </tr> <tr> <td>2</td> <td>Industrial waste</td> <td>Fertiliser bags</td> <td> <ul style="list-style-type: none"> Inventory of bags, reuse for Loose Fruit collection Sell to appointed contractor </td> </tr> </tbody> </table>			No	Type of waste	Description	Action to be taken	1	Domestic waste	Rubbish	<ul style="list-style-type: none"> Collection/disposal minimum 2x/week. Establish collection SOP, schedule & PIC Create awareness on hygiene Monitoring of line site 	2	Industrial waste	Fertiliser bags	<ul style="list-style-type: none"> Inventory of bags, reuse for Loose Fruit collection Sell to appointed contractor 	Complied
No	Type of waste	Description	Action to be taken														
1	Domestic waste	Rubbish	<ul style="list-style-type: none"> Collection/disposal minimum 2x/week. Establish collection SOP, schedule & PIC Create awareness on hygiene Monitoring of line site 														
2	Industrial waste	Fertiliser bags	<ul style="list-style-type: none"> Inventory of bags, reuse for Loose Fruit collection Sell to appointed contractor 														

RSPO Public Summary Report
Revision 9 (Nov 2019)

				Empty Chemical Containers,	<ul style="list-style-type: none"> • Recycle 20-litre chemical containers for pre-mixing and diluting herbicides. • Unused empty chemical containers to be triple rinsed, punctured and store separately for disposal through licensed agents. 		
				Scrap metal	<ul style="list-style-type: none"> • Inventory maintained, tender at zone level for sale to licensed contractor for recycle. • Recycle where appropriate for workshop maintenance 		
				POME	<ul style="list-style-type: none"> • Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas. • Treated in effluent plant. The final discharge from the treatment plant is used for water discharge. • Effluent quality monitoring on monthly basis. • Monitor and report effluent discharge to DOE on monthly and quarterly basis. <p>This practice is accordance with the requirements in the written approval issued by DOE.</p> <ul style="list-style-type: none"> • Review of the results revealed that the quality of the effluent discharge is in within the regulatory limit. 		
				Boiler ash	<ul style="list-style-type: none"> • Disposed to designated dumping site near holding pond. 		

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

				<ul style="list-style-type: none"> Daily leveling using machine. 			
			Empty Fruit Bunch	<ul style="list-style-type: none"> Send them to estates for mulching. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage 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. 			
		3	Sewage waste	Sewage	<ul style="list-style-type: none"> To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management. 		
		4	Scheduled Waste	All Schedule Waste generated to be managed in accordance to EQ (Scheduled Waste) Regulations 2005			
			SW 404 Clinical waste		<ul style="list-style-type: none"> Clean and tidy storage area. Inventory maintained. Storage in sharp bin in clinic. Separation of type SW using labels 10cm x 10cm Disposal to Kualiti Alam Waste Management (licensed contractor) /VMO clinic. 		
			SW rags, plastics, filters		<ul style="list-style-type: none"> Clean and tidy storage area. Inventory maintained. Storage in scheduled waste store. 		

				<p>SW Used battery Spent lubricant & hydraulic oil</p> <p>Disposed containers, bags, equipment contaminat ed with chemicals, pesticides, Safety Helmet</p>	<ul style="list-style-type: none"> • All containers are labelled. • Separation of type SW using labels 10cm x 10cm • Store separately lubricant and spent oil in bunded storage • Collection by licensed vendor. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE • Ensure inventory not exceeding 180 days / 20 mt • Follow approved consignment note and update in ESWIS • Provide training to the SW handlers 		
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Disposal of identified waste material were derived from the pollution impact recognized during the Environmental Aspect/ impact Assessment at POM and estates. To ensure proper and safe handling, storage and disposal of waste material and comply with applicable guidelines, regulations or Act the following SOP has been established.</p> <p><u>Scheduled waste including Clinical waste SW404</u></p> <ul style="list-style-type: none"> • Applicable legal requirement: EQ (Scheduled Waste) Regulations 2005 • SOP used: Estate – Group SOP Ref. no. IOI-OSH 3.2.2 dated 12/03/2018. Mill - Group SOP Bab 17 issue no. 2 dated 01/08/2018. See also Action to be taken in indicator 7.3.1 above. Therein the SOP describe details relating to: <ul style="list-style-type: none"> ✓ Labeling ✓ Legal requirement 			Complied		

		<ul style="list-style-type: none"> ✓ Waste generator ✓ Training required ✓ DOE license <p>a. <u>Triple rinsed Empty pesticides container</u></p> <ul style="list-style-type: none"> • Applicable legal requirement: Rinsing: Department of Agriculture Guidelines. Disposal: Non-Scheduled Waste as • SOP used: The Department of Agriculture Guideline ref: 91/120/038/014 dated 07/11/2002. <p>b. <u>Scheduled waste Disposed containers, bags, equipment contaminated with chemicals, pesticides, Safety Helmet</u></p> <ul style="list-style-type: none"> • Applicable legal requirement: EQ (Scheduled Waste) Regulations 2005 • SOP used: Estate – Group SOP Ref. no. IOI-OSH 3.2.2 dated 12/03/2018 <p>For Pamol Kluang Palm Oil Mill consignment note for scheduled waste was available for SW109, SW305, SW409, SW410 and SW429. The latest disposal was on 25 September 2019 via Kualiti Alam Sdn Bhd (DOE License no: 004992) validity period 01/05/2019 – 30/04/2020.</p> <p>Likewise, the disposal by estate example, Swee Lam sighted consignment note for scheduled waste SW305, SW409 and SW410 was on 21 November 2019 via Kualiti Alam Sdn Bhd (License no: 004992) validity period 01/05/2019 – 30/04/2020.</p> <p>Recycled wastes were separated and sold to recyclers while domestic wastes were accumulated in a bin for further collection by M/s Mido Enterprise. They were collected minimum two to three times per week.</p>	
--	--	---	--

RSPO Public Summary Report
Revision 9 (Nov 2019)

7.3.3	The unit of certification does not use open fire for waste disposal.	The Certification Unit does not use fire for waste disposal. Sighted no evidence on use of fire at line site. There was no replanting at Pamol Barat and Swee Lam estates visited.	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	<p>Good agriculture practices from the Group Standard Operating Procedures (StOPs), Section 4.0 Soil Conservation and Terracing, Section 5.0 Establishment and Maintenance of Legume Covers, Section 8.0: Manuring and Section 15.0 Foliar sampling were followed to manage soil fertility to ensure optimal and sustained yield and to minimize environmental impacts.</p> <p>Fertiliser application were made through recommendation by the Agronomist. Soil fertility was maintained as per the SOPs through the management been managed by recycling of biomass like frond stacking, water management in low lying areas, maintenance of soft weeds, leguminous cover crops, and <i>nephrolepis biserrata</i> in the interline and terrace areas. Beside the use of inorganic fertilizer as per annual fertilizer application program, organic fertilizer too in the form of POME and EFB is applied as per recommendation by Agronomist from IOI Research Centre.</p> <p>These practices were consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.</p>	Complied
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Soil sampling was done in May 2019 by Param Agricultural Soil Surveys (M) Sdn Bhd at Pamol Barat Estate and foliar sampling was done in September 2018 at Swee Lam Estate by IOI Research Centre, Gemencheh, Negri Sembilan.	Complied
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	Both estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose.	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<p>There was no POME applied at Swee Lam Estate due to the distance from the Pamol Kluang POM. Pamol Barat Estate, being nearby to Pamol Kluang POM received the treated POME for its land application.</p> <p>Sighted records of EFB in metric tons sent to audited estates as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2018 (EFB, mt)</th> <th>YTD Oct2019 (EFB, mt)</th> </tr> </thead> <tbody> <tr> <td>Pamol Barat</td> <td>9844.39</td> <td>8754.58</td> </tr> <tr> <td>Swee Lam</td> <td>20.91</td> <td>35.32</td> </tr> </tbody> </table>	Estate	2018 (EFB, mt)	YTD Oct2019 (EFB, mt)	Pamol Barat	9844.39	8754.58	Swee Lam	20.91	35.32																																
Estate	2018 (EFB, mt)	YTD Oct2019 (EFB, mt)																																									
Pamol Barat	9844.39	8754.58																																									
Swee Lam	20.91	35.32																																									
7.4.4	Records of fertiliser inputs are maintained.	<p>Records of programs and applications of fertilisers were maintained and adopted for operation monitoring at both estates. Fertilizer application program was based on the recommendation by Agronomist and documented in Fertilizer Program. The type and rate of fertilisers applied in the estates in 2018 and YTD October 2019 are as follows;</p> <table border="1"> <thead> <tr> <th>PBE</th> <th>RP</th> <th>Compound B</th> <th>NK Compak</th> <th>NK Mix</th> <th>Borate</th> <th>Kisrite</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>233.66</td> <td>1007.65</td> <td>437.09</td> <td>359.11</td> <td>8.31</td> <td>103.88</td> </tr> <tr> <td>2019</td> <th>RP</th> <th>NK Mix</th> <th>K-neutralizer</th> <th>Kisrite</th> <th>Bio-Compos e</th> <th>K-neutralizer</th> </tr> <tr> <td>2019</td> <td>347.36</td> <td>1415.99</td> <td>19.18</td> <td>151.17</td> <td>57.46</td> <td>10.22</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>SLE</th> <th>NK Compak</th> <th>RP</th> <th>Kisrite</th> <th>Borate</th> <th>Compound</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	PBE	RP	Compound B	NK Compak	NK Mix	Borate	Kisrite	2018	233.66	1007.65	437.09	359.11	8.31	103.88	2019	RP	NK Mix	K-neutralizer	Kisrite	Bio-Compos e	K-neutralizer	2019	347.36	1415.99	19.18	151.17	57.46	10.22	SLE	NK Compak	RP	Kisrite	Borate	Compound							Complied
PBE	RP	Compound B	NK Compak	NK Mix	Borate	Kisrite																																					
2018	233.66	1007.65	437.09	359.11	8.31	103.88																																					
2019	RP	NK Mix	K-neutralizer	Kisrite	Bio-Compos e	K-neutralizer																																					
2019	347.36	1415.99	19.18	151.17	57.46	10.22																																					
SLE	NK Compak	RP	Kisrite	Borate	Compound																																						

		2018	848.02	185.22	203.46	16.72	283.95		
		2019 YTD	770.16	158.84	125.89	9.94	297.59		

Criteria 7.5:

Practices minimise and control erosion and degradation of soils.

7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.	<p>Baseline soil surveys and topographic information, including the identification of steep terrain, marginal and fragile soils was available at Palmol Barat and Swee Lam Estate. Sighted the soil series available in soil maps at both Estates as shown below.</p> <p>There was no other soil categorised as problematic or fragile soil.</p> <table border="1" data-bbox="952 778 1809 1177"> <thead> <tr> <th colspan="2">Palmol Barat Estate</th> </tr> </thead> <tbody> <tr> <td>Renggam</td> <td>Harimau</td> </tr> <tr> <td>Segamat</td> <td>Tebok</td> </tr> <tr> <td>Serdang</td> <td>Terap</td> </tr> <tr> <td>Gali</td> <td>Guan</td> </tr> <tr> <td>Durian</td> <td>Beserah</td> </tr> <tr> <td>Bungor</td> <td>Chat</td> </tr> <tr> <td>Tai Tak</td> <td>Kuala Brang</td> </tr> </tbody> </table> <table border="1" data-bbox="952 1230 1809 1329"> <thead> <tr> <th colspan="2">Swee Lam Estate</th> </tr> </thead> <tbody> <tr> <td>Jerangau</td> <td>Renggam</td> </tr> </tbody> </table>	Palmol Barat Estate		Renggam	Harimau	Segamat	Tebok	Serdang	Terap	Gali	Guan	Durian	Beserah	Bungor	Chat	Tai Tak	Kuala Brang	Swee Lam Estate		Jerangau	Renggam	Complied
Palmol Barat Estate																							
Renggam	Harimau																						
Segamat	Tebok																						
Serdang	Terap																						
Gali	Guan																						
Durian	Beserah																						
Bungor	Chat																						
Tai Tak	Kuala Brang																						
Swee Lam Estate																							
Jerangau	Renggam																						

RSPO Public Summary Report
Revision 9 (Nov 2019)

7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.	Slope of more than 25 degrees are avoided in the planting areas due to the Policy of the Company forecasting several issues during the crop recovery on maturity. No replanting has taken place on steep slopes sighted.	Complied
7.5.3	There is no new planting of oil palm on steep terrain.	There was no new planting at the Certification Unit.	Complied
Criteria 7.6:			
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	IOI Plantation Management has established Group Standard Operating Procedures (StOPs) for estate, under Operations Master List dated September 2007 to ensure long term suitability of land for Palm oil cultivation. This manual included planting density, land clearing and preparation, Leguminous cover plant, Manuring, weeding, Pest and disease, no planting on steep terrain and others. Soil map was available for all estates, refer indicator 7.5.1. The common soil series found at Palmol Barat and Swee Lam Estate were Bungor and Renggam series. Viewing of map did not find any planting in marginal and fragile soils.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	There was no fragile soil in estates audited.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Soil map (photocopy) at Palmol Barat and See Lam Estates updated digitally by IOI Research Centre, Gemencheh was available and used to address the planning of infrastructure in the field. <u>Palmol Barat Estate</u>	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<p>The map was prepared by Dr Param from Param Agriculture Soil Survey (M) Sdn Bhd (June 1991-Updated January 2005) and was digitally remapped by Mr Tan Tech Hock of IOI Research Centre, Gemencheh on 10/3/2009.</p> <p><u>Swee Lam Estate</u></p> <p>The map was prepared by staff of Soil Survey Division, Soils and Analytical Services Branch, Division Of Agriculture, Ministry of Agriculture and Fisheries, Malaysia, under the supervision of W.M. Law (1968). It was then digitally remapped by Mr Tan Teck Hock of IOI Research Centre, Gemencheh on 10/3/2009.</p>	
<p>Criteria 7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	There was no peat soil sighted at all estate visited	N/A
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	There was no peat soil sighted at all estate visited	N/A
<p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance.</p>			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	There was no peat soil sighted at all estate visited	N/A
7.7.4	(C) A documented water and ground cover management programme is in place.	There was no peat soil sighted at all estate visited	N/A
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO	There was no peat soil sighted at all estate visited	N/A

	<p>Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	There was no peat soil sighted at all estate visited	N/A
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p>	There was no peat soil sighted at all estate visited	N/A

Criteria 7.8 Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	The Water Management Plan 2019 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; i) Efficiency of usage- metered usage by mill and line site, no pipe leaks, regular inspection to avoid overflow of septic tank or seepage and training. ii) Renewability of sources iii) Impact of water used – minimize use and do not pollute iv) Surface and ground water availability v) Outgoing water analysis – meet DOE and MOH set standards vi) Monitoring of rainfall – sighted data records at mill and estates for last 7 years for mill and estate use for operational planning vii) Water drainage - no clogged drain viii) Plantation activities - avoid fertilizing at edge of stream to reduce runoff and contamination of water course. Also, no spraying at buffer zones and at edge of man-made stream. ix) No Construction of bund/weir across rivers x) Harvesting of rainwater	Complied
	b) Workers have adequate access to clean water.	Clean treated water is supplied via pipe free of charge to workers by the Palmol Kluang POM to its workers and workers of Palmol Barat Estate at line site while Swee Lam provide free treated water from its water treatment plant.	
7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. IOI group has established riparian buffer zone distance as per Department of Irrigation and Drainage department and documented in HCV Assessment Report as follows:	Complied

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

		<table border="1"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>As per the requirements to obtain the license from SPAN and permit from JTK, domestic water quality analysis for chemical and biological contamination is conducted every 6 months. It was found that the quality of domestic water supply in these estates is within the limits as per Malaysian Food Act 1983 Regulation 2012.</p> <p>To ensure water courses are protected and water quality are safe for use Pamol Kluang POM conduct intake river water monitoring on monthly basis. Analysis was conducted by Environmental Consultancy and Monitoring Services.</p> <p>Similarly, for estates river water monitoring was conducted on annual basis. Stream Water Quality Index (WQI) test was conducted once a year by IOI Research Centre and overall the results were satisfactory.</p>	River width	Buffer zone	> 40 meters	50 meters	40 meters	40 meters	10 - 20 meters	20 meters	5 - 10 meters	10 meters	< 5 meters	5 meters	
River width	Buffer zone														
> 40 meters	50 meters														
40 meters	40 meters														
10 - 20 meters	20 meters														
5 - 10 meters	10 meters														
< 5 meters	5 meters														
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	<p>The treated mill effluent discharge was regularly monitored as prescribed in the "Jadual Pematuhan" license issued by DOE to the mill. At the time of audit, the mill used 100% furrow system to discharge POME.</p> <p>Regular monitoring of effluent final discharge analysis was monitored on monthly basis by accredited 3rd party laboratory, Nalco Industrial Services Malaysia Sdn. Bhd. Sighted the effluent results below and all parameters complied to the DOE requirement. (Units in mg/l except for pH)</p> <table border="1"> <thead> <tr> <th>Parameters</th> <th>Standard</th> <th>09/07/2019</th> <th>16/08/2019</th> <th>12/09/2019</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Parameters	Standard	09/07/2019	16/08/2019	12/09/2019						Complied		
Parameters	Standard	09/07/2019	16/08/2019	12/09/2019											

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

			pH	5-9	7.70	7.90	7.30			
			BOD	<5000	3040.00	176.00	3500.00			
			Suspended solids		30400.00	1263.00	42300.00			
			Oil & grease	50	116.00	32.00	148.00			
			Ammoniacal N	150	66.00	28.00	34.00			
			Total N	200	77.00	38.00	42.00			
			<p>Daily site checks on the effluent ponds were also carried out by the supervisory personnel and effluent attendants. For quarterly reports the effluent parameters were submitted using "<i>Borang Penyata Suku Tahun</i>" to DOE for compliance timely as enumerated below:</p> <p>1st quarter@1 January – 31 March 2019 dated 18/04/2019. 2nd quarter@1 April – 31 June 2019 dated 30/07/2019. 3rd quarter@1 July – 30 September 2019 dated 24/10/2019.</p> <p>As part of Continual Improvement Program the mill had identified new methods to achieve the BOD level <100 mg/l for the water discharge, vis-a-vis:</p> <ul style="list-style-type: none"> 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 <p>Monitoring conducted as per POME sampling analysis Test Report by Nalco Industrial Services Malaysia Sdn. Bhd. as following:</p>							

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<ul style="list-style-type: none"> - Test # 8119/19-e-h; Report # EF/0142/06/19; Date: 19/7/2019 for July 2019; Final pond BOD: 350mg/l (water course @ 100mg/l limit - no discharge); Facultative pond # 3 BOD: 3040mg/l (furrow land application @ 5000mg/l limit) - Test # 8217/19-a-d; Report # EF/0142/07/19; Date: 30/8/2019 for August 2019; Final pond BOD: 159mg/l (water course @ 100mg/l limit - no discharge); Facultative pond # 3 BOD: no discharge due to desludging process (Application for desludging of Facultative pond # 3 and Algae pond # 3 approval by DOE; Letter ref. # AS(B)J: 31/152/000/048 Jilid 16 (12); Date: 18/8/2019) - Test # 8296/19-a-d; Report # EF/0142/08/19; Date: 4/10/2019 for September 2019; Final pond BOD: 94mg/l (water course @ 100mg/l limit - no discharge); Facultative pond # 3 BOD: no discharge due to desludging process (Application for desludging of Facultative pond # 3 and Algae pond # 3 approval by DOE; Letter ref. # AS(B)J: 31/152/000/048 Jilid 16 (12); Date: 18/8/2019) # period given 10 weeks from 20/8/2019 = notification started on 19/9/2019 																																													
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Water used for mill processing of FFB is recorded as shown below.</p> <table border="1" data-bbox="1048 900 1839 1334"> <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 19</td><td>20557.00</td><td>5637.19</td><td>3.65</td></tr> <tr><td>Feb 19</td><td>17200.00</td><td>4525.23</td><td>3.80</td></tr> <tr><td>Mac 19</td><td>19088.00</td><td>4738.11</td><td>4.03</td></tr> <tr><td>April 19</td><td>17671.00</td><td>4531.82</td><td>3.90</td></tr> <tr><td>May 19</td><td>20553.00</td><td>5053.26</td><td>4.07</td></tr> <tr><td>June 19</td><td>18366.00</td><td>4353.07</td><td>4.22</td></tr> <tr><td>July 19</td><td>18383.00</td><td>4777.26</td><td>3.84</td></tr> <tr><td>Aug 19</td><td>17001.00</td><td>5538.33</td><td>3.06</td></tr> <tr><td>Sept 19</td><td>18545</td><td>5520.50</td><td>3.36</td></tr> <tr><td>Oct 19</td><td>19444</td><td>5486.84</td><td>3.54</td></tr> </tbody> </table>	Month	Water usage m3	CPO Mt	Water usage/CPO produced	Jan 19	20557.00	5637.19	3.65	Feb 19	17200.00	4525.23	3.80	Mac 19	19088.00	4738.11	4.03	April 19	17671.00	4531.82	3.90	May 19	20553.00	5053.26	4.07	June 19	18366.00	4353.07	4.22	July 19	18383.00	4777.26	3.84	Aug 19	17001.00	5538.33	3.06	Sept 19	18545	5520.50	3.36	Oct 19	19444	5486.84	3.54	Complied
Month	Water usage m3	CPO Mt	Water usage/CPO produced																																												
Jan 19	20557.00	5637.19	3.65																																												
Feb 19	17200.00	4525.23	3.80																																												
Mac 19	19088.00	4738.11	4.03																																												
April 19	17671.00	4531.82	3.90																																												
May 19	20553.00	5053.26	4.07																																												
June 19	18366.00	4353.07	4.22																																												
July 19	18383.00	4777.26	3.84																																												
Aug 19	17001.00	5538.33	3.06																																												
Sept 19	18545	5520.50	3.36																																												
Oct 19	19444	5486.84	3.54																																												

Criteria 7.9:

Efficiency of fossil fuel use and the use of renewable energy is optimised.

7.9.1

A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is implemented, monitored and documented.

Pamol Kluang POM consistently monitors the following and tabulates the data monthly.

Direct usage of diesel for the mill operations are recorded. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel.

Month 2019	Diesel used/L	CPO produced /mt	Diesel/CP O
Jan	4819	5637.19	0.85
Feb	4174	4525.23	0.92
Mac	4088	4738.11	0.86
April	4829	4531.82	1.07
May	5128	5053.26	1.01
June	4488	4353.07	1.03
July	4784	4777.26	1.00
Aug	3446	5538.33	0.62
Sept	6981	5516.72	1.26
Oct	5438	5486.84	0.99

The mill recorded a range of 0.62 to highest 1.26 for the entire 10 months.

There were measures as shown in the energy management plan to reduce and eliminate wastages among others as follows;

- To ensure optimum FFB ramp balance to commence processing
- Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages

Complied

		<ul style="list-style-type: none"> - Regular servicing of turbine for a better efficiency and to minimise running of gen-set - Educate employees on fuel saving practices. 	
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.	The GHG emissions for FY 2018/19 has been verified. Source of the emissions were mainly due to fossil fuel consumption, POME treatment and utilization of fertilizer. The fuel and fertilization consumption was documented in Access database and was cross reference to the estate records. Plans to reduce or minimise GHG emissions include: <ul style="list-style-type: none"> • Avoid purchasing second grade diesel from unauthorised dealers that contain high sulphur content. • Monitor the effectiveness of diesel use by vehicles (shovels, tractors and lorries) and gensets and continue regular maintenance (servicing) of these machineries for smooth running of engines. <u>Electricity Usage</u> <ul style="list-style-type: none"> • Conversion of currents lights to energy saving lights from time to time. • Switch off fan and lights when not in use to reduce electricity usage thus reducing diesel consumption. 	Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	There was no proposed development area in the Palmol Kluang Certification Unit noted. Hence, no New Planting.	Complied

<p>7.10.3</p>	<p>(C) Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>	<p>The Continuous Improvement Plan 2019 has documented the potential pollutants inclusive of GHG emissions especially from fossil fuel consumption, treatment of POME and fertilizer usage.</p> <p>Plans have been established with realistic timeline to reduce GHG emissions such as low-emission management practices for</p> <ul style="list-style-type: none"> a. Mill, that is better management of POME, efficient boiler and sent EFB to estate for mulching as well as operation of biogas plant and polishing plant; b. Plantations, that is, EFB application to reduce inorganic fertilizer use, energy efficient transportation (on-time servicing and maintenance), good water management and restitution of conservation areas. <p>Quarterly monitoring of ambient air and stack emission as per following:</p> <ul style="list-style-type: none"> - Report of Ambient Air Quality for Pamol Kluang POM; Project ref. # ENV/PAMOL/AMB/TSP/134; Monitoring date: 19-20/9/2019 by ENV Consultancy & Monitoring Services Sdn. Bhd.; Result: 7.38-17.62% below MRAG (Malaysian Air Quality Guidelines) limit of 260µg/m³ - Report of Ambient Air Quality for Pamol Kluang POM; Project ref. # ENV/PAMOL/AMB/TSP/109; Monitoring date: 18-19/3/2019 by ENV Consultancy & Monitoring Services Sdn. Bhd.; Result: 5.42-17.34% below MRAG (Malaysian Air Quality Guidelines) limit of 260µg/m³ <p>Six-monthly monitoring of stack emission as per following:</p> <ul style="list-style-type: none"> - Air Emission Monitoring Report for Pamol Kluang POM Boiler # 1; Report # AEMR(J)/19-07/11; Monitoring date: 15/7/2019 by Eurofins NM Laboratory Sdn. Bhd.; Result: 230.88mg/m³ TPM & exceed EQ (Clean Air) Reg. 2014 limit of 150mg/m³ (with license to contravene) - Air Emission Monitoring Report for Pamol Kluang POM Boiler # 2; Report # AEMR(J)/19-06/16; Monitoring date: 28/6/2019 by Eurofins NM Laboratory Sdn. Bhd.; Result: 65.31mg/m³ TPM & within EQ (Clean Air) Reg. 2014 limit of 150mg/m³ 	<p>Complied</p>
---------------	---	---	-----------------

Criteria 7.11:			
Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	Not applicable. Zero burning. Only felling and chipping of palm trees	N/A
7.11.2	The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Not applicable	N/A
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Not applicable	N/A
Criteria 7.12:			
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protector enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	This indicator is not applicable as no new planting exist within Pamol Kluang certification unit.	N/A
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	New planting was not existed within Pamol Kluang certification unit. For existing plantations, HCV assessment has been reviewed on November 2019 by the executive from the sustainability team who has attended HCV training. IOI sustainability team has prepared a Management Plan for protection of the HCV area in Pamol Barat estates and at mill housing site complex that is based on habitat	Complied

RSPO Public Summary Report
Revision 9 (Nov 2019)

		protection as well as enhancement of the area. HCV/Conservation area checklist sighted being monitored on monthly basis.	
	b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	This indicator is not applicable as no new planting exist within Pamol Kluang certification unit.	
<p>PROCEDURAL NOTE for 7.12.2: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p>			
7.12.3	<i>Indicator is not applicable in Malaysia context.</i>	Not applicable	N/A
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	This indicator is not applicable as no new planting exist within Pamol Kluang certification unit.	N/A

**RSPO Public Summary Report
Revision 9 (Nov 2019)**

7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	This indicator is not applicable as no new planting exist within Pamol Kluang certification unit.	N/A
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	This indicator is not applicable as no new planting exist within Pamol Kluang certification unit.	N/A
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	This indicator is not applicable as no new planting exist within Pamol Kluang certification unit.	N/A
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	This indicator is not applicable as no new planting exist within Pamol Kluang certification unit.	N/A

Appendix B: Approved Time Bound Plan

Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd (30th September 2019)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakon, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	ASA-03 completed in July 2019	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Recertification audit conducted on Nov 2019	On-site RAV 2 completed on Nov 2019	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Recertification audit conducted on Nov 2019	On-site RAV 2 completed on Nov 2019	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, Jasin Lalang and Sembilan Tani (Associated Outgrower)	Aug 2009	Re-Certified in Aug 2015	ASA-04 completed in May 2019	No outstanding issues
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2015	ASA-03 completed in July 2019.	In progress of closing the NCs
6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	ASA-04 completed in August 2019	In progress of closing the NCs
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	ASA-04 completed in August 2019	In progress of closing the NCs
8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	ASA-03 completed in March 2019	No outstanding issues
9.	Leepang (Sabah) POM	Morisem 5, Leepang 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Re-certified in December 2018	Recertification audit completed in November 2018	No outstanding issues.
10.	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Re-certified in Mar 2018	ASA-01 audit completed in January 2019.	No outstanding issues

RSPO Public Summary Report
Revision 9 (Nov 2019)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
11.	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and Bimbingan 2	Oct 2012	Re-certified in July 2018	ASA-01 audit completed in January 2019.	No outstanding issues
12.	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang 2, Leepang 3, and Leepang 4	Sept 2013	Re-certified in December 2018	ASA-01 audit completed in September 2019	No outstanding issues
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 outgrowers and 1 Collection Centre	Planned - 2018	Certified in July 2018	ASA-01 audit completed in April 2019.	No outstanding issues Outgrowers are not part of the certified area
14.	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 16 outgrowers	Dec 2017	Certified in May 2018	ASA-01 audit completed in February 2019.	No outstanding issues Outgrowers are not part of the certified area
15.	IOI – Pelita, Sarawak	Sejap and Tegai	Planned – TBC as it is under the resolution process	Uncertified Unit	New certification for IOI – Pelita (Sarawak) is in the resolution process	CICOM completed the Capacity Building Program at the end of June 2019. Currently, with input from all stakeholders, including the State of Sarawak Government, IOI is evaluating options in regards to the surveyors to be involved in the Community Participatory Mapping. Further and updated progress of this issue could be access through the link below; (a) IOI Pelita Land Dispute Resolution Plan (b) Current progress on IOI Pelita Land Dispute Resolution Process (c) https://www.ioigroup.com/Content/MEDIA/Media?Category=7 (d) RSPO Case Tracker – IOI Pelita Status of Complaints Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. The ex-gratia payment is part of the resolution process before they moving on to the Community Participatory Mapping process which will be conducted in Q4 2019.
16.	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned - 2019	Uncertified Unit	In progress of RSPO certification. RSPO Stage 1 is completed in September 2019. Stage 2 assessment planned to be conducted in Q4 2020.	RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.

RSPO Public Summary Report
Revision 9 (Nov 2019)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						<p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> <p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019</p> <p>Pending issuance of HGU.</p>
17.	PT BNS, Indonesia	BNS 1, BNS 2, BNS 3 and BNS 4	Planned - 2019	Uncertified Unit	<p>In progress of RSPO certification. RSPO Stage 1 is completed in September 2019. Stage 2 assessment planned to be conducted in Q4 2020.</p>	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p>

RSPO Public Summary Report
Revision 9 (Nov 2019)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						<p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> <p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019</p> <p>Pending issuance of HGU.</p>
18.	PT BSS, Indonesia	BSS 1, BSS 2, BSS 3 and BSS 4	Planned - 2019	Uncertified Unit	<p>In progress of RSPO certification. RSPO Stage 1 is completed in September 2019. Stage 2 assessment planned to be conducted in Q4 2020.</p>	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> <p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019</p> <p>Pending issuance of HGU.</p>
19.	PT KPAM, Indonesia	Under Development	Planned - 2023	Uncertified Unit	<p>NPP and HCSA was approved in April 2018. Currently under development.</p>	<p>RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:</p> <p>https://rspo.org/certification/new-planting-procedures/public-consultations/ioi-group-pt-kalimantan-prima-agro-mandiri</p>

RSPO Public Summary Report
Revision 9 (Nov 2019)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						<p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:</p> <p>http://highcarbonstock.org/registered-hcs-assessments/</p>

Appendix C: GHG Reporting Executive Summary

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

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

The summary of the Net GHG emitted in 2019 for Pamol Kluang Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.31
PKO	1.31

Extraction	%
OER	23.93
KER	4.95

Production	t/yr
FFB Process	221,029.60
CPO Produced	52,892.38
PKO Produced	10,940.97

Land Use	Ha
OP Planted Area	10,864.00
OP Planted on peat	-
Conservation (forested)	37.74
Conservation (non-forested)	51.45
Total	10,953.19

Summary of Field Emission and Sink

	Own Crop		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	105,630.54	0.47	-	-	-	-	105,630.54	0.47
CO ₂ Emission from fertilizer	21,443.67	0.10	-	-	-	-	21,443.67	0.10
NO ₂ Emission	-	-	-	-	-	-	-	-
Fuel Consumption	12,010.30	0.05	-	-	-	-	12,010.30	0.05
Peat Oxidation	1,556.50	0.01	-	-	-	-	1,556.50	0.01
Sink								
Crop Sequestration	- 99,880.33	- 9.19	-	-	-	-	- 99,880.33	- 9.19
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	40,760.69	3.75	-	-	-	-	40,760.69	3.75

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	44,205.92	0.20
Fuel Consumption	165.78	-
Grid Electricity Utilization	-	-
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	44,371.71	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

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

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

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	November 2018	23,820.82	-	23,820.82
2	December 2018	25,199.33	-	25,199.33
3	January 2019	23,403.01	-	23,403.01
4	February 2019	18,688.42	-	18,688.42
5	March 2019	19,522.35	-	19,522.35
6	April 2019	19,148.35	-	19,148.35
7	May 2019	20,731.16	-	20,731.16
8	June 2019	17,929.14	-	17,929.14
9	July 2019	19,728.64	-	19,728.64
10	August 2019	22,437.08	-	22,437.08
11	September 2019	22,063.63	-	22,063.63
12	October 2019	23,036.15	-	23,036.15
Total		255,708.08	-	255,708.08

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	November 2018	5,677.75	1,094.47
2	December 2018	5,967.63	1,210.86
3	January 2019	5,637.19	1,146.21
4	February 2019	4,525.23	923.67
5	March 2019	4,738.11	955.44
6	April 2019	4,531.82	932.27
7	May 2019	5,053.26	949.43
8	June 2019	4,353.07	741.54
9	July 2019	4,777.26	840.72
10	August 2019	5,538.33	1,105.94
11	September 2019	5,520.50	1,063.72
12	October 2019	5,486.85	1,062.45
Total		61,807.00	12,026.72

RSPO Public Summary Report
Revision 9 (Nov 2019)

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	A	TR-5dc789d7-2f0d	2,363.14	-
2	A	TR-244ab2c9-c882	3,324.15	-
3	A	TR-650e90e1-29ee	1,797.52	-
4	B	TR-73fbb3d4-c469	42.66	-
5	A	TR-8b846833-9219	1,641.11	-
6	A	TR-5e4b492c-09ce	440.04	-
7	A	TR-109d5699-11a5	1,308.99	-
8	A	TR-e95e64a9-df90	2,937.83	-
9	A	TR-1f2ed0df-a8ec	424.81	-
10	A	TR-f75a4741-276e	2,326.98	-
11	A	TR-f467737b-dccc	1,422.69	-
12	A	TR-4ac0808e-c103	259.56	-
13	A	TR-7330e979-7fde	202.85	-
14	A	TR-1c688ab0-dc3f	1,201.46	-
15	A	TR-e43f90bd-d8ef	501.95	-
16	A	TR-df41d7ef-eafe	1,769.99	-
17	A	TR-a98629c9-37b5	2,535.06	-
18	A	TR-21aefe7e-9c92	499.47	-
19	A	TR-926b9a21-8ec6	2,240.30	-
20	A	TR-3ddb0a36-d916	906.99	-
21	A	TR-63f62938-6ed0	1,116.48	-
22	A	TR-00da8674-790f	601.24	-
23	A	TR-04208811-7c5e	1,443.02	-
24	A	TR-3d6505ca-1595	301.44	-
25	A	TR-b2537296-bad9	1,504.84	-
26	A	TR-9113ca05-f967	4,201.33	-
27	A	TR-cada34f2-5b6e	821.31	-
28	A	TR-19e1b91f-4c49	500.74	-
29	A	TR-f1c668a9-5dae	500.04	-
30	A	TR-d05b7247-7d0a	196.95	-

RSPO Public Summary Report
Revision 9 (Nov 2019)

31	A	TR-3a68627b-5ebe	2,089.25	-
32	A	TR-5cfb343f-af2a	999.66	-
33	A	TR-785f98cd-2a4c	140.18	-
34	A	TR-d90f5b19-1d3e	849.36	-
35	A	TR-d85e85a1-f283	1,897.94	-
36	A	TR-fa5344dc-9dc3	3,242.47	-
37	A	TR-0db936a7-12c7	656.72	-
38	A	TR-7ae74d31-c3c7	502.43	-
39	A	TR-6f1d0346-8fc5	1,000.81	-
40	A	TR-ef92c059-a802	3,267.63	-
41	A	TR-54f291ed-13d2	2,384.94	-
42	A	TR-6d86cdc9-a8d1	1,902.83	-
43	A	TR-7c5a520a-9547	2,248.93	-
44	A	TR-bec161e1-f437	-	250.00
45	A	TR-b0a0c6d5-7d95	-	200.00
46	A	TR-8fc4f224-10f4	-	787.00
47	A	TR-35a430ea-bb63	-	200.00
48	A	TR-20e27af9-a508	-	400.00
49	A	TR-83494a90-9314	-	300.00
50	A	TR-8e3c52e6-91fd	-	250.00
51	A	TR-f7412971-5fe3	-	320.00
52	A	TR-cf1c3ffd-6006	-	280.00
53	A	TR-7fd66efe-a824	-	500.00
54	A	TR-fcedf8e7-8e59	-	850.00
55	A	TR-98d374ea-9a29	-	250.00
56	A	TR-6ba88a28-180f	-	300.00
57	A	TR-2e2c37f2-be1f	-	300.00
58	A	TR-3e6241e3-250d	-	250.00
59	A	TR-6a4bab4a-5881	-	450.00
60	A	TR-a4cdb38d-8d2a	-	550.00
61	A	TR-12d247de-23f6	-	250.00
62	A	TR-2814891b-e3c0	-	100.00
63	A	TR-661d3fcc-e725	-	200.00
64	A	TR-59e838b2-be53	-	450.00

RSPO Public Summary Report
Revision 9 (Nov 2019)

65	A	TR-dd791af1-930a	-	100.00
66	A	TR-78c67ffa-0b0a	-	100.00
67	A	TR-aa499147-c8a0	-	250.00
68	A	TR-8b5decf2-844c	-	200.00
69	A	TR-ee4d00fd-012e	-	250.01
70	A	TR-63210687-02c9	-	150.00
71	A	TR-59fc1a51-d7e3	-	200.00
72	A	TR-99d5be6c-38f1	-	200.00
73	A	TR-5ba3eccc-e129	-	100.00
74	A	TR-e26f5c76-73bf	-	100.00
75	A	TR-a6b7e1d2-9a37	-	750.00
76	A	TR-a65dd4f0-ce72	-	200.00
77	A	TR-4c7f154b-1f80	-	150.00
78	A	TR-ad8f14ac-1efe	-	926.00
79	A	TR-13d746aa-e298	-	400.00
80	A	TR-29625259-7edd	-	200.00
81	A	TR-5ae85f56-a564	-	326.00
82	A	TR-b329585c-3329	-	400.00
Total			60,518.09	12,439.01

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil	n/a	n/a	n/a	n/a

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
Nil	n/a	n/a	n/a

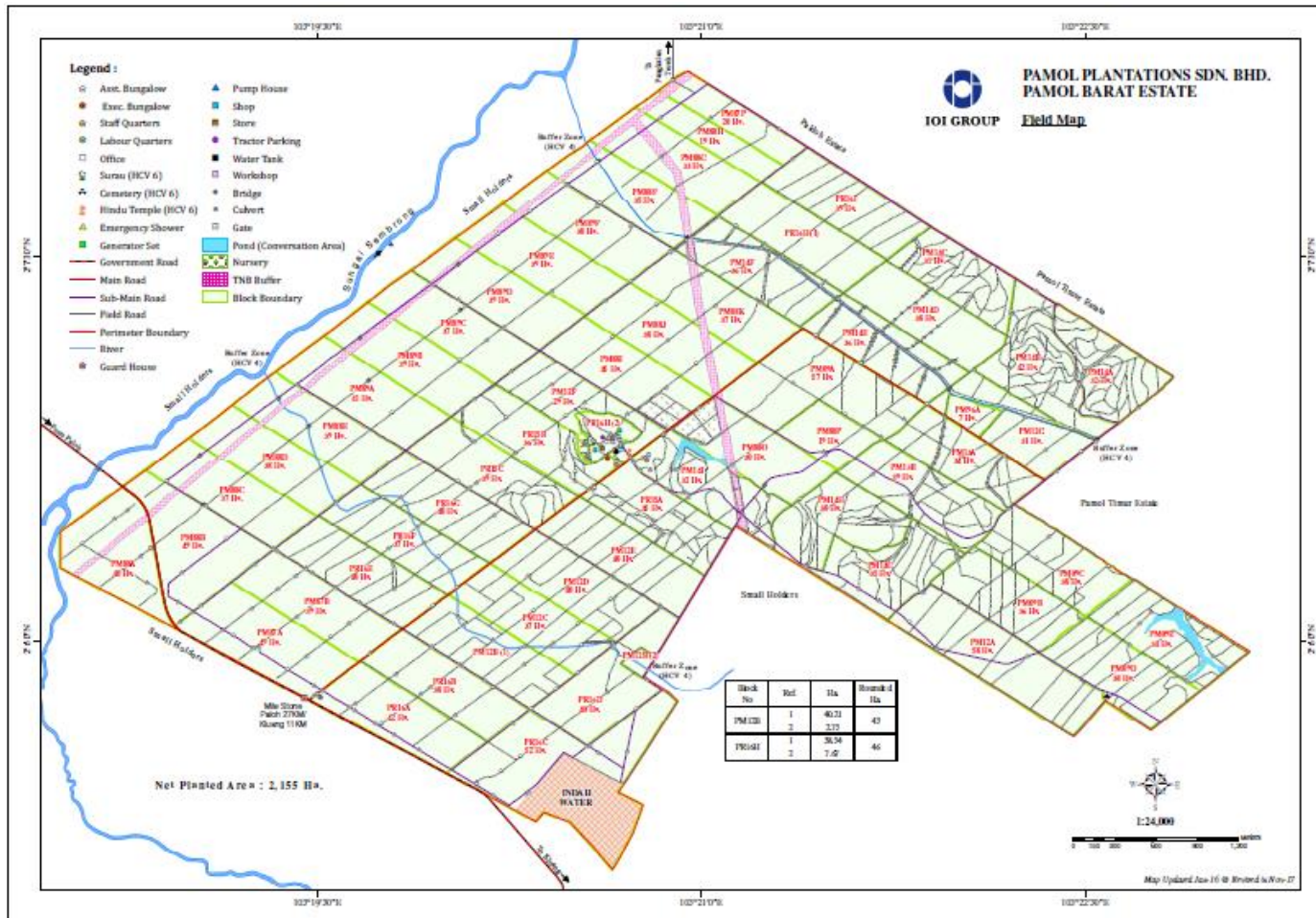
F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)

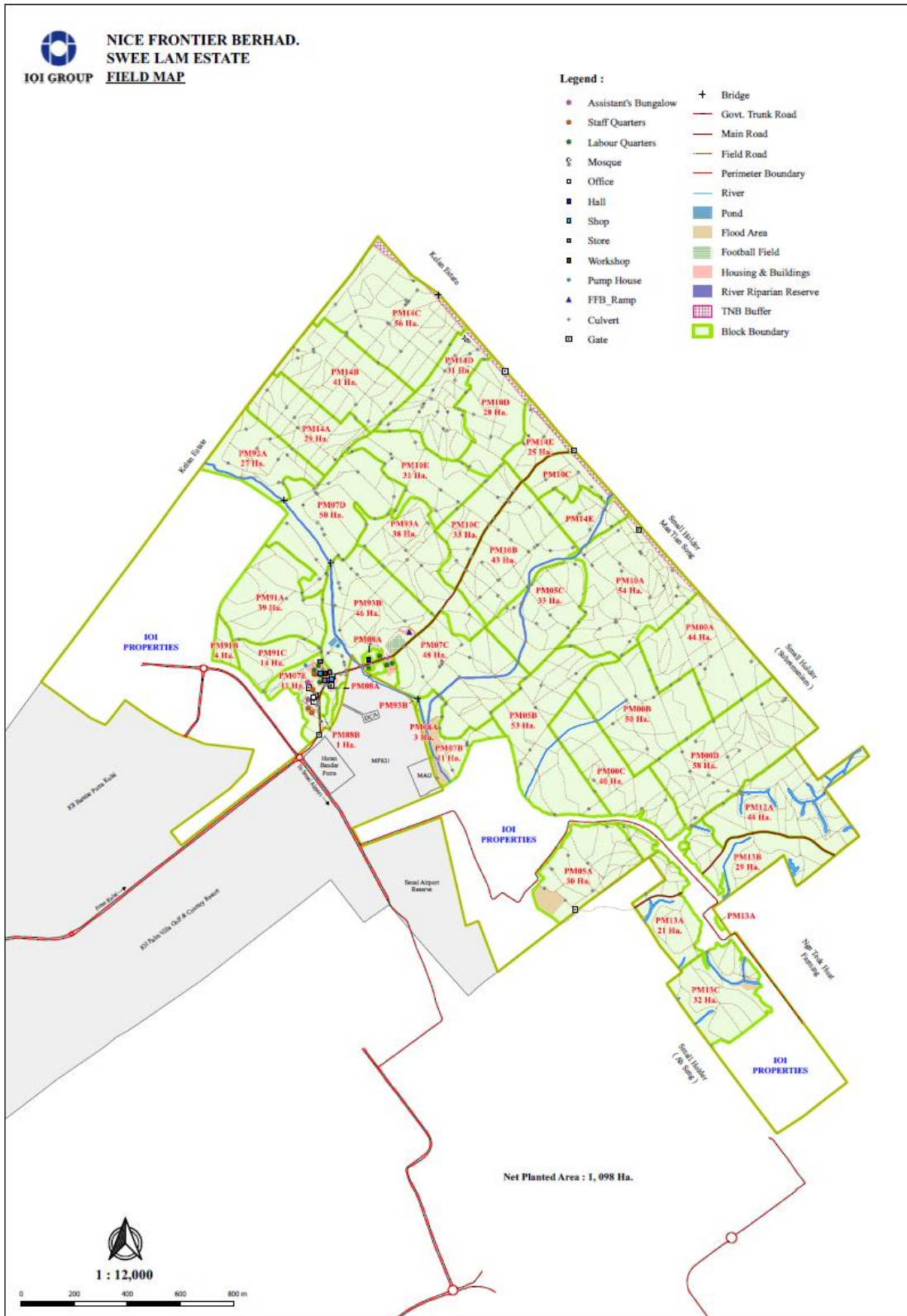
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil	n/a	n/a	n/a

Appendix E: Location Map of IOI Pamol Kluang Palm Oil Mill Certification Unit and Supply bases



Appendix F: Pamol Barat Estate & Swee Lam Estate Field Map





Appendix G: List of Smallholder Sampled

Not applicable

Appendix H: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure