PF441 RSPO P&C Public Summary Report Revision 10 (Mar 2020)

### RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

### Initial Assessment

### □ Annual Surveillance Assessment

### ☑ Recertification Assessment (RC2)

### □ Extension of Scope

### Client Company name (Parent Company): IOI Corporation Berhad

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

Certification Unit: Dynamic Plantations Bhd - Gomali Palm Oil Mill and Supply base

> Location of Certification Unit: Gomali Palm Oil Mill, 5th Mile, Jalan Gemas-Batu Anam 85100 Segamat, Johor, Malaysia.

> > ...making excellence a habit. Page 1 of 133

	NTS	Page No
Section 1: S	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)	7
8.	Certified Tonnage of FFB (from other certified unit(s)) if applicable *	7
9.	Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if ap	oplicable8
10.	Certified Tonnage	8
11.	Actual Sold Volume (CPO)	8
12.	Actual Sold Volume (PK)	9
13.	Actual Group certification Claims	9
Section 2: A	Assessment Process	10
2.1	Assessment Methodology, Programme, Site Visits	10
2.2	BSI Assessment Team:	12
2.3	Assessment Plan	13
Section 3: A	Assessment Findings	16
3.1 No	prmative requirement applied for this assessment:	16
3.2 Tir	ne Bound Plan progress for multiple management units	16
3.3 Pr	ogress of scheme smallholders and/or outgrowers (if applicable to this assessment	t)17
3.4 De	tails of findings	
3.4.1 9	Status of Nonconformities Previously Identified and Observations	
3.4.2 \$	Summary of the Nonconformities and Status	31
3.5 Sta	akeholders and previous land owner / user consultation	32
3.6 Im	partiality and conflict of interest	34
Formal Sigr <b>defin</b>	ning-off of Assessment Conclusion and Recommendation <b>Error!</b> Bookn ed.	nark not
Appendix A	: Summary of Findings include the appropriate checklist used for assessme	<i>ent</i> 36
Appendix B	: Approved Time Bound Plan	113
Appendix C	: GHG Reporting Executive Summary	121
Appendix D	: Supply Chain Declaration	123
	making excelle	nce a habit. <sup>™</sup>



Appendix E: Location Map of Certification Unit and Supply bases
Appendix F: Estate Field Map129
Appendix G: List of Smallholder Sampled (If applicable – scheme/associated/group certification) 
Appendix H: List of Abbreviations

### Section 1: Scope of the Certification Assessment

1. Company Details					
Parent Company	IOI Corporation Berhad				
RSPO Membership Number	2-0002-04-000-00 Membership Approval Date 17/05/2004				
Address	Head Office : IOI City Tower 2, I Malaysia.	_ebuh IRC, IOI R	esort City	v, 62502 Putrajaya,	
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Dynamic Plantations Bhd - Gomali Palm Oil Mill and Supply base				
Location / Address	Certification Unit : Gomali Palm Segamat, Johor, Malaysia.	Oil Mill, 5th Mile	e, Jalan G	Gemas-Batu Anam 85100	
Website	www.ioigroup.com				
Management Representative	Chai Tian Siang     E-mail     gmm@ioigroup.com       Mill Manager     Image: Image				
Telephone	+603-89478888 +607-9498245	Facsimile	+607-94	99245	

2. Certification Information					
Certificate Number	RSPO 727112	Date of First Certification 23/8/2010			
		Certificate Start Date	23/8/2020		
		Certificate Expiry Date	22/8/2025		
Scope of Certification	Palm Oil and Palm Kernel Production				
Visit Objectives	The objective of the assessment was to conduct assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.				
Applicable Standards	☑ RSPO P&C 2018 with supply chain Module ☑ Identity Preserved □ Mass Balance ☑ <i>Malaysian</i> National Interpretation 2019 for RSPO P&C 2018 with supply chain Module □				
	Identity Preserved  Mass Bala				

3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
MSPO 004B	Part 3 of MS 2530 – Plantations and organized smallholders	Intertek Certification International Sdn Bhd	09/09/2023			
MSPO 004A	Part 4 of MS2530- Palm Oil Mill	Intertek Certification International Sdn Bhd	09/09/2023			

MSCC-005-88	Malaysian Sustainable Palm Oil Supply Chain Certification Standard (MSPO SCCS) under the MSPO Certification Scheme	Intertek Certification International Sdn Bhd	28/08/2024
EU-ISCC-Cert-DE100- 17192019	ISCC EU	SGS Germany GmbH	30/08/2020

4. Location(s) of Mill & Supply Bases						
Name	Location	GPS Coordinates				
(Mill / Supply Base)		Latitude	Longitude			
Gomali POM	Gomali Palm Oil Mill, 5th Mile, Jalan Gemas-Batu Anam, 85100 Segamat, Johor, Malaysia.	2° 36' 38.47" N	102° 40' 45.98" E			
Gomali Estate	Jalan Gemas-Batu Anam 85100 Segamat, Johor, Malaysia	2°36'41.7"N	102°40'24.0"E			
Paya Lang Estate	Batu Anam, 85100 Segamat, Johor, Malaysia.	2°34'56.6"N	102°42'27.6"E			
Tambang Estate	Tambang Estate, Batu Anam, Segamat 85100 Johor, Malaysia.	2°37'55.1"N	102°42'59.1"E			
Sagil Estate	8 Milestone, Jalan Tangkak-Segamat, 84900 Tangkak, Johor, Malaysia	2°18'54.1"N	102°38'04.9"E			
Regent Estate	2nd Mile, Jalan Batang Melaka, 73200 Gemencheh, Negeri Sembilan, Malaysia.	2°30'50.6"N	102°24'16.8"E			
Bahau Estate	Batu 5, Jalan Bahau-Rompin, 72100 Bahau, Negeri Sembilan, Malaysia.	2°48'32.6"N	102°26'55.4"E			
Kuala Jelei Estate	5KM, Jalan Tampin, 72109 Bahau, Negeri Sembilan, Malaysia.	2°46'28.4"N	102°23'23.1"E			
Bertam Estate	Flora Horizon Sdn Bhd, Bertam Estate, 76100 Durian Tunggal, Melaka, Malaysia.	2°18'14.5"N	102°17'05.6"E			
Jasin Lalang Estate	5KM From 15 Miles Air Merbau, Jalan Jasin Bemban, Jasin Melaka, Malaysia	2°15'16.9"N	102°25'16.3"E			
Bukit Dinding Estate	1 1/2 Miles, Jalan Mentakab, 28600 Karak, Pahang, Malaysia	3°23'28.5"N	102°04'31.8"E			

5. Description of Supply Base						
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Gomali Estate	2,171	3.41	381.34	2,555.75	84.95	

...making excellence a habit." Page 5 of 133

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Paya Lang Estate	1,971	0.75	495.50	2,467.25	79.89
Tambang Estate	1,875	5.57	130.13	2,010.70	93.25
Sagil Estate	1,952	7.70	705.96	2,665.66	73.23
Regent Estate	2,137	12.29	150.98	2,300.27	92.90
Bahau Estate	2,629	3.16	212.01	2,844.17	92.43
Kuala Jelei Estate	634	2.68	42.58	679.26	93.34
Bertam Estate	411	0	37.80	448.80	91.58
Jasin Lalang Estate	1,485	0.58	78.31	1,563.89	94.96
Bukit Dinding Estate	1,447	46.82	166.61	1,660.43	87.15
Total	16,712	82.96	2,401.22	19,196.18	87.06

#### Notes:

Tambang Estate planted area reduced due to GIS adjustment.

Sagil Estate planted area reduced due to change of crop.

Bahau Estate planted area reduced to due to replanting cause some road adjustment

Increase in HCV area in Tambang Estate and Jasin Lalang Estate due to GIS adjustment by 0.44 Ha and 0.08 Ha respectively.

Decrease in HCV area in Kuala Jelei Estate by 0.86 Ha due to GIS adjustment.

6. Plantings & Cycle							
Fatata	Age (Years)						
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
Gomali Estate	0	545	1396	230	0	2,171	0
Paya Lang Estate	0	894	821	256	0	1,971	0
Tambang Estate	299	212	656	699	9	1,576	299
Sagil Estate	456	22	450	553	471	1,496	456
Regent Estate	447	281	689	373	347	1,690	447
Bahau Estate	636	480	1019	257	237	1,993	636
Kuala Jelei Estate	0	83	424	127	0	634	0
Bertam Estate	0	0	411	0	0	411	0
Jasin Lalang Estate	0	450	1035	0	0	1,485	0
Bukit Dinding Estate	67	429	825	73	53	1,380	67
Total (ha)	1,905	3,396	7,726	2,568	1,117	14,807	1,905



### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

7. Certified Tonnage of FFB (Own Certified Scope)						
	Tonnage / year					
Estate	Estimated (Sept 2019 - Aug 2020)		Actual ( <i>May 2019 – June 2020</i> )			
		Previous license period (May 2019 – Aug 2019)	<i>Current license period</i> (Sept 2019 – June 2020)			
Gomali Estate	46,625.26	17,193.21	32,040.00	49,932.82		
Paya Lang Estate	46,530.61	13,400.87	31,025.61	40,699.76		
Tambang Estate	32,314.98	9,740.82	20,589.62	26,672.18		
Sagil Estate	37,968.17	14,301.21	24,760.36	31,524.64		
Regent Estate	38,995.19	14,436.92	25,150.78	34,225.84		
Bahau Estate	50,158.38	18,108.24	34,436.13	45,647.68		
Kuala Jelei Estate	21,204.99	6,947.92	11,163.56	16,368.57		
Bertam Estate	19,631.04	3,896.44	9,811.28	13,168.29		
Jasin Lalang Estate	37,671.33	11,649.30	24,416.15	31,976.71		
Bukit Dinding Estate	38,900.05	11,675.24	24,468.79	37,527.46		
Total	370,000.00		359,212.45	327,743.95		

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *						
		Tonnage / year				
Estate	Estimated	Act ( <i>May 2019 -</i>	Forecast			
	N/A	Previous license period (May 2019 – Aug 2019)	<i>Current license period</i> (Sept 2019 – June 2020)	N/A		
Bukit Serampang Estate		321.32	1,525.04			
Segamat Estate		197.63	316.92			
Shahzan 1 Estate		99.24	0			
Detas Estate		0.45	0			
Total		2,460.60				



### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable					
		Tonnag	je / year		
Independent FFB Supplier	Estimated (Sept 2019 - Aug 2020)	Actual ( <i>May 2019 – June 2020</i> )		Forecast (Sept 2020 – Aug 2021)	
		Previous license period (May 2019 – Jul 2019)	<i>Current license period</i> (Aug 2019 – June 2020)		
Nil					
Total					
Note: Nil					

10. Certified Tonnage					
	Estimated (Sept 2019 - Aug 2020)	Actual ( <i>May 2019 – June 2020</i> )		Forecast (Aug 2020 – July 2021)	
	FFB (mt)	FFB (mt)		FFB (mt)	
Mill Capacity: 90 MT/hr	370,000.00	<i>Previous license period</i> (May 2019 – Aug 2019)	<i>Current license</i> <i>period</i> (Sept 2019 – June 2020)	327,743.95	
SCC Model:		122,580.50	239,092.55		
IP/ <del>MB</del>	CPO (OER: 21.81%)		CPO (OER:21.79%) (mt)		
	81,400	26,734.80	52,146.09	71,415.41	
	PK (KER:4.95%) (mt)	PK (KER: 4.72%) (mt)		PK (KER: 5%) (mt)	
	18,315	5,785.79	11,285.17	16,387.20	

Total actual FFB own estate + other FFB from certified estate = 359,212.45 mt + 2,460.60 mt = 361,673.05 mt

11. Actual Sold Volume (CPO)						
Current License period						
	DEDO Cortified	Other Schen	nes Certified	Convertional	Total	
	RSPO Certified	ISCC	Others	Conventional	iotai	
CPO (MT)	39,380.46	-	-	-	39,380.46	
Previous Li	icense period					
CPO (MT)	29,079.26	1,643.91	-	1,403.50	32,126.67	
making overllance a babit™						

...making excellence a habit. Page 8 of 133

12. Actual Sold Volume (PK)							
Current Lie	Current License period						
	DCDO Contified	Other Schen	nes Certified	Conventional	Tatal		
	RSPO Certified	ISCC	Others	Conventional	Total		
PK (MT)	8,469.5	-	-	-	8,469.5		
Previous L	Previous License period						
PK (MT)	6,192.38	-	-	-	6,192.38		

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



#### **Section 2: Assessment Process**

#### **Certification Body:**

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067) 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 (<u>Nicholas.Cheong@bsigroup.com</u>) 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 29/6/2020 - 4/7/2020. 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 on-site assessment was conducted on 15/9/2020. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criterias 2018 MYNI 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 comments made by external stakeholders were also taken into account in the assessment where the stakeholder notification was made on 14/05/2020 through BSI and RSPO website as per following link: <a href="https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2020/05-2.-public-notification recertification gomali-palm-oil-mill english.pdf">https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2020/05-2.-public-notification recertification gomali-palm-oil-mill english.pdf</a>

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

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



### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

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

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

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_2)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)	
IOI Gomali POM	√	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	
Gomali Estate		$\checkmark$			$\checkmark$	
Paya Lang Estate			$\checkmark$			
Tambang Estate		$\checkmark$			$\checkmark$	
Sagil Estate			$\checkmark$			
Regent Estate		$\checkmark$		$\checkmark$		
Bahau Estate	√		$\checkmark$		$\checkmark$	
Kuala Jelei Estate	$\checkmark$			$\checkmark$		
Bertam Estate	√		$\checkmark$		$\checkmark$	
Jasin Lalang Estate	√			$\checkmark$		
Bukit Dinding Estate		$\checkmark$		$\checkmark$		

Tentative Date of Next Visit: July 5, 2021 - July 9, 2021

### PF441 RSPO P&C Public Summary Report Revision 10 (Mar 2020)

#### Total No. of Mandays: 18 Mandays

#### 2.2 BSI Assessment Team:

Team Member	Role	Qualifications
Name	(Team Leader or Team member)	(Short description of the team members)
Muhamad Naqiuddin	Trainee Lead Auditor	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health and workers consultation.
Nicholas Cheong	Team Member	Holds a Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labour & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is fluent in both verbal/written in English.
Mahzan Munap	Team Member	He holds an 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 assessed on the aspects of mill and estate best practices and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.



### PF441 RSPO P&C Public Summary Report Revision 10 (Mar 2020)

#### **Accompanying Persons:**

Name	Role
Nil	

#### 2.3 Assessment Plan

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

Date	Time	Subjects	MN	NC	ММ
Sunday, 28/6/2020		Travel from office to Tampin	V	$\checkmark$	$\checkmark$
Monday 29/6/2020	0830-0930	<ul> <li>Jasin Lalang estate:</li> <li>Opening Meeting: <ul> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> </ul> </li> </ul>	V	V	V
	0930-1230	Jasin Lalang 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, Scheduled waste management, worker housing, clinic, Landfill, , etc. Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	$\checkmark$	V	$\checkmark$
	1230-1400	Lunch Break	$\checkmark$	$\checkmark$	$\checkmark$
	1400–1730	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc).	V	$\checkmark$	$\checkmark$
	1730–1800	Interim Closing Briefing	$\checkmark$	$\checkmark$	$\checkmark$
Tuesday 30/6/2020	0830–1300	Bertam 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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	$\checkmark$	V	V

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Date	Time	Subjects	MN	NC	ММ
		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		$\checkmark$	
	1300 - 1400	Lunch Break	$\checkmark$	$\checkmark$	$\checkmark$
	1400-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc).	V	V	V
	1630-1700	Interim Closing Briefing	$\checkmark$	$\checkmark$	$\checkmark$
Wednesday 1/7/2020	0830-1300	Kuala Jelei 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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	V	V	V
	1300 - 1400	Lunch Break	$\checkmark$	$\checkmark$	$\checkmark$
	1400-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records	$\checkmark$	$\checkmark$	$\checkmark$
	1630-1700	Interim Closing Meeting	$\checkmark$	$\checkmark$	$\checkmark$
Thursday 2/7/2020	0830-1300	Bahau 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, Scheduled waste management, worker housing, clinic, Landfill, , etc. Meeting with stakeholders (Government, village	√	√ √	V
		rep, smallholders, Union Leader, contractor etc.)			
	1300 - 1400	Lunch Break	√	V	V
	1400-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records	V	V	$\checkmark$
	1630-1700	Interim Closing Meeting	$\checkmark$	$\checkmark$	$\checkmark$

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Date	Time	Subjects	MN	NC	ММ
Friday 3/7/2020	0830–1300	Gomali POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	V	V	$\checkmark$
		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		$\checkmark$	
	1300 - 1400	Lunch Break	$\checkmark$	$\checkmark$	$\checkmark$
	1400-1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, HCV records, SEIA documents & records and Supply Chain requirement.	$\checkmark$	V	$\checkmark$
	1630-1700	Closing Meeting Preparation	$\checkmark$	$\checkmark$	$\checkmark$
	1700-1730	Closing Meeting	$\checkmark$	$\checkmark$	$\checkmark$

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

### **Section 3: Assessment Findings**

#### **3.1 Normative requirement applied for this assessment:**

 $\boxtimes\,$  IOI Corporation Berhad Multiple Management Units / Time Bound Plan

☑ RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil

□ RSPO Group Certification Standard 2016

Malaysia National Interpretation 2019 for RSPO P&C 2018

□ Independent Smallholder Standard 2019

#### 3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. Refer to IOI Corporation Berhad Time Bound Plan updated as of June 2020 (Appendix B).	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of June 2020 (Appendix B) and IOI ACOP 2019 (Section 4.2.1) which was submitted to RSPO.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three- year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes. Refer to IOI Corporation Berhad Time Bound Plan updated as of June 2020 (Appendix B) and IOI ACOP 2019 (Section 4.2.1) which was submitted to RSPO.	Yes
, i i i i i i i i i i i i i i i i i i i	This is consistent with ACOP reporting.	
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	Refer to IOI Corporation Berhad Time Bound Plan updated as of June 2020 (Appendix B) and IOI ACOP 2019 (Section 4.2.1) which was submitted to RSPO. There has been no isolated lapse in the implementation of the plan.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	Refer to IOI Corporation Berhad Time Bound Plan updated as of June 2020 (Appendix B) and IOI ACOP 2019 (Section 4.2.1) which was submitted to RSPO. There has been no fundamental failure to proceed with implementation of the plan.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: • Primary forest.	No. There has been no replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3.	Yes
Any area required to maintain or enhance HCVs		



RSPO P&C Public Summary Report Revision 10 (Mar 2020)

in accordance with RSPO P&C criterion 7.3.		
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Our concession in Indonesia PT. BSS and PT. KPAM had undergo the NPP process prior to any new planting. Please refer to our latest Time Bound Plan updated as of June 2020	Yes
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.	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. Reference: latest Time Bound Plan updated as of June 2020 (Appendix B).	Yes
Note:	Further information on the current progress are publicly available in IOI website	
	https://www.ioigroup.com/Content/S/S_Progress	
	IOI have zero liabilities for RaCP.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute.	NA
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance.	NA
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes IOI has sent their Internal Audit Checklist to BSI and the Stage 1 Audit Plan for SNA Group which was conducted on 9 – 12 September 2019. Based on the internal audit findings, as positive assurance there has been no replacement of primary forest, no labour dispute and no major non-compliance with legal.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	No. IOI Implementation on Sustainability progress in 2018 including Certification progress have been verified by independent third party. The report is publicly available in the website: <u>https://www.ioigroup.com</u>	Yes

#### 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?	NA as there is no scheme smallholders and/or scheme outgrowers under the certification of IOI Gomali POM.	NA
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.	

#### **3.4 Details of Nonconformities**

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this recertification assessment there were 4 Major (Critical) nonconformities & 5 Minor nonconformities and 8 Opportunity For Improvement raised. The IOI Gomali POM and Supply base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the 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 #	1929856-202006-M1	Clause & Category (Major / Minor)	6.6.1 Critical (Major)
Date Issued	3/7/2020	Due Date	30/9/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/9/2020
Statement of Nonconformity:	Employment conditions in requirements.	nplemented is not fully a	according to the RSPO
Requirement Reference:	All workers have entered into employment voluntarily and the following are prohibited: • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages		
Objective Evidence:	<ol> <li>Employment contract of Saripudin and Hapis under contractor CK Permai Enterprise stated that "worker agree to allow employer to safe keep the passport". This practice is not following IOI's Passport Safe Keeping Guideline dated Aug 2017 whereby it is the decision of the worker to give or not. Furthermore the contract does not have any termination clause.</li> <li>As per Guidelines on Reproductive Health (Doc IOI/G/SE/002; rev 01; dated 15/01/2020), if there is not alternative work that could be offered by the company to pregnant women, workers shall take leave. The procedure did not further have steps on mutually agreement if suitable job is not available.</li> </ol>		

Corrections:	<ol> <li>CK Permai's workers using IOI's work permit shall be absorbed by Jasin Lalang and Bertam estates and these workers shall be issued with IOI's contract of employment with the same benefits, privileges and conditions currently enjoyed by other IOI's workers once CK Permai and IOI Plantation's management sign a mutual agreement. IOI's Passport Safe Keeping Guideline will also be implemented Please refer to Appendix 6.1.1 (1) Employment Contract</li> <li>The Guidelines on Reproductive Health shall be revised according to the current practice to clearly reflect mutual agreement between the management and the worker on the offering of suitable alternative work or to go on leave.</li> <li>Please refer to Appendix 6.1.1(2) The revised Guidelines on Reproductive Health</li> </ol>
Root Cause Analysis:	Whilst every effort is taken by IOI to comply with Employment conditions required by RSPO requirements, some operating centre personnel who are new and inexperienced sometimes tend to misunderstand or misinterpret our policies, plans, guidelines etc. As we don't find these issues in all operating centres, it is therefore not IOI's intention to not fully implement the employment conditions.
Corrective Actions:	A retraining on sustainability requirements which emphasizes on IOI's Passport Safe Keeping Guidelines, employment contract, termination clause, new Guidelines on Reproductive Health (Doc IOI/G/SE/002; rev 01; dated 14/08/2020) shall be conducted for IOI operating centres on 25/8/2020. Please refer to Appendix 6.1.1 (3) Training record on Reproductive Health and Employment Contract dated 25th August 2020.
Assessment Conclusion:	<ol> <li>Inprovincit contact dated 25th Adgust 2020.</li> <li>The estates (Bertam and Jasin Lalang) has absorb all the workers contractors under IOI quota as their employee. Sighted the employment contract, 'Lampiran 2: Penerimaan Pasport dan Permohonan Loker' and payslip for the month of August 2020 for below: Passport no. Previous Employee Current Employee Employment no. AT 9416xx CK Permai Enterprise Bertam Estate BTE 116x AT 9802xx CK Permai Enterprise Bertam Estate BTE 117x B 12605xx CK Permai Enterprise Jasin Lalang Estate JLE 280x</li> <li>Revised the Guidelines on Reproductive Health, doc ref no. IOI/G/SE/002 rev. no 2, date issue 14/8/2020 stated: "To allocate suitable alternative work for the pregnant woman based on mutual agreement between the management and the workers"</li> <li>Training records on Guidelines on Reproductive Health         <ul> <li>Gomali POM dated 21/8/2020</li> <li>Jasin Lalang Estate dated 9/9/2020</li> <li>Kuala Jelei estate dated 14/8/2020</li> <li>Bertam Estates dated 28/8/2020</li> <li>Training records on 'Reproductive Health and Employment Contract" for staff and Executives dated 25/8/2020 Based on the above evidence, the major NC is closed effectively on 15/9/2020. Continuous implementation will be further verified in the next audit.</li> </ul> </li> </ol>

Non-conformity			
NCR Ref #	1929856-202006-M2	Clause & Category (Major / Minor)	6.4.2 Critical (Major)
Date Issued	3/7/2020	Due Date	30/9/2020

Closed	Yes	Date of nonconformity	15/9/2020
(Yes / No)		Closure	
Statement of Nonconformity:	There is no documented age screening verification procedure.		
Requirement Reference:	There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.		
<b>Objective Evidence:</b>	There is no documented ag	e screening verification proce	dure.
Corrections:	The Company's minimum age for recruitment has been included in the new "Employment Procedures for Local workers" and the revised "Foreign workers Recruitment Guidelines and Procedures in Malaysia".		
Root Cause Analysis:	As the Sustainability department has already trained O.Cs management and staffs regarding the company's minimum age for recruitment, the age screening verification procedure was not documented. Workers are also informed regarding age requirements during induction training.		
Corrective Actions:	The Company's new "Employment Procedures for Local workers" and the revised "Foreign workers Recruitment Guidelines and Procedures in Malaysia" have been distributed to all O.Cs		
Assessment Conclusion:	<ol> <li>Foreign workers Recruitn email + Appendix A Flowcha 4. Form PA1/13 sampled fill</li> </ol>	for Local workers - HR com e nent Guidelines and Procedur art of foreign workers recruit ed submit to JTK received on	mail dated 8/7/2020 es in Malaysia – HR Com nent dated 24/8/2020 13/8/2019 and 9/7/2019
	Based on the above evidence, the major NC is closed effectively on 15/9/2020. Continuous implementation will be further verified in the next assessment.		

Non-conformity			
NCR Ref #	1929856-202006-M3	Clause & Category (Major / Minor)	2.1.1 Critical (Major)
Date Issued	3/7/2020	Due Date	30/9/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/9/2020
Statement of Nonconformity:	Operating Units do not comply with the following requirements: 1. OSH USECHH 2000 Regulations; 2. CLASS 2013 Regulations and 3. Section 60A(4) Employment Act 1955 4. Immigration Act 1959 Section 55B 5. Environmental Quality Schedule Regulations (2005)		
Requirement Reference:	(C) The unit of certification complies with applicable legal requirements.		

Objective Evidence:	At Bertam Estate & Jasin Lalang Estate • contractor CK Permai Enterprise is using IOI Foreign Labour Quota. At Kuala Jelei Estate • expired Safety Data Sheet for chemical Kenlly and diesel. At Bahau Estate • no re-labeling of Shell Rimula R2 Extra 15W-40 on the 20-liter HDPE transferred container. • Bahau Estate's SDS for Shell Advance 4T chemical was not obtained from		
	supplier. • 4 x 200-liter damaged lul for disposal as Scheduled V		utside the Lubricant store
	At Gomali Mill • Prabhunarayan Chauhan allowable limits set by JTK • No relabeling of containe • Contaminated oily rags a • 5-liter empty paint conta area.	as per approval letter date r (a 2-liter bottle) containin nd carton box at POME Put	ng lubricant. mp house
Corrections:	A training has been conducted on 25th August 2020 for Legal Liaison Officers (Assistants Managers) and the relevant staffs on Recent update on management of safety and sustainability. The purpose of the training was to improve their understanding towards the interpretation of legal requirements and the relevant action to be taken to seek compliance.		
Root Cause Analysis:	The legal liaison officers who are responsible to monitor the legal compliance in each operating centers were failed to ensure the compliance of the above mentioned legal requirements due to lack of understanding and poor interpretations.		
Corrective Actions:	Compliance towards the legal compliance by all operating centers will be checked by Sustainability, Safety and Health Department during planned internal audit visit.		
Assessment Conclusion:	1.The estates (Bertam and Jasin Lalang) has absorb all the workers contractors under IOI quota as their employee. Sighted the employment contract, 'Lampiran 2: Penerimaan Pasport dan Permohonan Loker' and payslip for the month of August 2020 for below:		
	Passport no.	Previous Employee	Current Employee Employment no.
	AT 9416xx	CK Permai Enterprise	Bertam Estate BTE 116x
	AT 9802xx	CK Permai Enterprise	Bertam Estate BTE 117x
	B 12605xx	CK Permai Enterprise	Jasin Lalang Estate JLE 280x

2. Safety Data Sheet has been updated with latest review available as follows: a. SDS Kenly latest revision date 13/3/2019 b. SDS Diesel B7 latest revision date $21/10/2017$ c. SDS for Shell Advance 4T 19/2/2018
3. Lubricant secondary/transferred container has been labelled with 'Flammable Logo'
4. 4 x 200-liter damaged lubricant container located outside the Lubricant store disposed on $7/9/2020$ as per C/N no. $2020090710$ KY8LOP
5. Paint container has been stored in the Scheduled waste store under SW 409 before being disposed as per inventory records through ESWISS for the month of September 2020.
6. Contaminated rags has been stored in the Scheduled waste store under SW 410 before being disposed as per inventory records dated 9/7/2020
7. Monthly Workplace Inspection for Gomali POM records dated 28/8/2020
8. Training on "Recent update on Management on safety and sustainability" dated 25/8/2020
9. Sustainability Internal Audit checklist as per audit conducted on 13/5/2020 and verification audit has been conducted on 26/6/2020. The compliance on workers overtime records were monitored under Section Social: Workers Agreement/Affair item no. 16: Workers overtime record (check roll/payroll).
10. The overtime records for the month of August 2020 for the sampled workers with Employment ID no. GMM 114x recorded in Monthly Attendance/OT for August 2020 recorded at 116 hours, below the permissible limit of 130 hours as per JTK Approval Permit.
Based on the above evidence, the major NC is closed effectively on 15/9/2020. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	1929856-202006-M4	Clause & Category (Major / Minor)	3.6.1 Critical (Major)
Date Issued	3/7/2020	Due Date	30/9/2020
Closed	Yes	Date of nonconformity	15/9/2020
(Yes / No)		Closure	
Statement of Nonconformity:	Coverage of risk assessment had not included Human Fatigue working long hours.		
Requirement Reference:	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	No Human Fatigue Risk Assessment found in the HIRAC Register		
Corrections:	A standalone Human Fatigue Working Long hour's risk assessment has been developed by extracting from the various activities listed in current HIRARC register.		
Root Cause Analysis:	The human fatigue factor working long hours has been integrated in various job activities in the current HIRARC register such as weighbridge, process, maintenance, etc. Thus, there is no standalone Human Fatigue working long hours risk assessment.		

Corrective Actions:	O.Cs have been reminded to take note of the new "A standalone Human Fatigue Working Long Hours" assessment and carry out HIRARC whenever there are accidents and/or new risks as per requirements.
Assessment Conclusion:	1. HIRARC standalone for Mental or psychological stress and physical or physiological stress dated 6/7/2020
	2. Communication from Safety Department to all OU's as per email dated 29/7/2020
	3. Training records on Human Fatigue Working on Long Hours
	a. Gomali POM dated 24/8/2020
	b. Bahau Estate dated 7/9/2020
	c. Jasin Lalang Estate dated 9/9/2020 d. Kuala Jelei estate dated 10/8/2020
	e. Bertam Estates dated 30/7/2020
	4. Training records on 'Updates on HIRARC and Store Best Safety Practice' for staff and Executives dated 25/8/2020
	5. Minutes meeting of OSH Committee for Gomali POM dated 30/7/2020 Based on the above evidence, the major NC is closed effectively on 15/9/2020. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	1929856-202006-N1	Clause & Category (Major / Minor)	3.5.1 (Minor)
Date Issued	3/7/2020	Due Date	Open
Closed (Yes / No)	Yes	Date of nonconformity Closure	Next annual surveillance assessment
Statement of Nonconformity:	There is no employment procedure for local recruitment.		
Requirement Reference:	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.		
<b>Objective Evidence:</b>	There is no employment procedure for local recruitment.		
Corrections:	The Company's recruitment, selection, hiring, promotion, retirement and termination are documented in the new "Employment Procedures for Local workers".		
Root Cause Analysis:	As the O.Cs management and staffs are aware of recruitment procedures, employment procedures for local workers was not documented. This is also because very few local workers apply for jobs in the plantation sector. At present, the O.Cs also refer to the Foreign workers Recruitment Guidelines and Procedures in Malaysia as the guide.		
Corrective Actions:	The Company's new "Employment Procedures for Local workers" and the revised "Foreign workers Recruitment Guidelines and Procedures in Malaysia" have been distributed to all O.Cs.		

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Assessment Conclusion:	As this is minor NC, Corrective action plan accepted on 28/8/2020 the	
	effectiveness implementation will be further verified in the next assessment.	

Non-conformity	Non-conformity			
NCR Ref #	1929856-202006-N2	Clause & Category (Major / Minor)	6.5.4 (Minor)	
Date Issued	3/7/2020	Due Date	Open	
Closed (Yes / No)	Yes	Date of nonconformity Closure	Next annual surveillance assessment	
Statement of Nonconformity:	The special grievance mech anonymity and protect com	anism for reporting sexual ha plainants.	rassment did not respects	
Requirement Reference:	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.			
Objective Evidence:	Guidelines on Reproductive Health (Doc IOI/G/SE/002; rev 01; dated 15/01/2020 Appendix B identified that grievance are submitted through estate "Green Book", HQ hotline number or Employee Consultative Committee (ECC). This approach does not observe anonymity because the "Green Book" can be access by estate managers, office staff and parties that wanted to raise a grievance. This is contradicting with WEC guidelines clause 4.7. Additionally, the ECC is not specific committee that is supposed to manage such grievance. This arrangement contradicts with the WEC guidelines objective clause 4.1 and 4.6 where WEC is a platform for women to voice out concern and act as a mediator in resolving complaints on sexual harassment.			
Corrections:	As we have already have a "Sexual Harassment Reporting Procedure Flowchart", we shall include it when we conduct training on the new WEC Guidelines for all WEC members			
Root Cause Analysis:	7/3/2020, most OCs have y new WEC Guidelines for the (MCO). As the WEC committee was the members may have bee	erment Committee (WEC) wa vet to conduct meetings or aw eir WEC members due to the s previously named Gender Co en confused as they have yet Sexual Harassment Reporting	vareness training on the Movement Control Order onsultative Committee, to be trained on the	
	"Internal Grievance Standa for Implementation of Wom	rd of Procedure" which is App nen and Empowerment (Doc 1 hanism which is used to raise	endix B of the Guidelines OI/G/SE/001; rev 01;	
	discreetly/anonymously as	es know that sexual harassme per the "Sexual Harassment F o Social Impact Assessment a	Reporting Procedure"	
Corrective Actions:		ning for existing employees sment procedure and grievan		

Assessment Conclusion:	As this is minor NC, Corrective action plan accepted on 28/8/2020 the
	effectiveness implementation will be further verified in the next assessment.

Non-conformity	Non-conformity			
NCR Ref #	1929856-202006-N3	Clause & Category (Major / Minor)	3.4.2 (Minor)	
Date Issued	3/7/2020	Due Date	Open	
Closed (Yes / No)	Yes	Date of nonconformity Closure	Next annual surveillance assessment'	
Statement of Nonconformity:	The social management pla	n has not completed compre	hensively.	
Requirement Reference:	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.			
Objective Evidence:	<ol> <li>The Bahau Estate management plan has not included issue regarding pricing of grocery shop highlighted during the JCC meeting.</li> <li>The Bertam Estate management plan has not included concern raised in the grievance records i.e. speed of vehicle and dust created by the vehicle.</li> <li>At Bahau Estate, despite electricity is being subsidized by the company, the electricity charge for workers that uses more than 23kwh per person is charged following the industrial rate. The company shall look into this impact to workers' salary as the workers can be benefited from domestic rate.</li> </ol>			
Corrections:	Social Impact management plan for all OCs reviewed carefully by OC Management and Sustainability Team, changes were made accordingly based on the issues and concerns raised.			
Root Cause Analysis:	The operating centres (OC) social management plan was not sufficiently comprehensive as it was being developed only by referring to the Group SIA (GSIA) which only provided a general impact assessments covering the entire group. Thus the SIA of the operating centres were not site specific and did cover some the specific impacts in the OCs.			
Corrective Actions:	be conducted on the core	ocuments to be site specific, needs of the SIA document. and accessed regularly durir	Monitoring of issues and	
Assessment Conclusion:		ve action plan accepted on 28 ner verified in the next assess		

Non-conformity			
NCR Ref #	1929856-202006-N4	Clause & Category	7.3.1 (Minor)
		(Major / Minor)	

Date Issued	3/7/2020	Due Date	Open
Closed (Yes / No)	Yes	Date of nonconformity Closure	Next annual surveillance assessment
Statement of Nonconformity:	Found the waste managem	ent plan inadequately implem	nented and documented
Requirement Reference:		which includes reduction, rec nd hazardous characteristics,	
Objective Evidence:	<ul> <li>Sighted the Waste management plan was not in accordance with the actual implementation in estate such as;-</li> <li>a) Jasin Lalang estate: SW 301 and 409 that has been generated by estate was not included in the Waste Management Plan</li> <li>b) Bertam estate: management plan stated SW 404 and SW102 has been generated by estate however, no evidence sighted for SW 404 and SW 102 in estate.</li> <li>c) Bahau estate did not include plan for sewage and old tyre</li> <li>d) Kuala Jelei estate: did not cover waste generated by workshop and dried pome implementation in waste management plan</li> </ul>		
Corrections:	Waste management plan for all OCs shall be reviewed carefully by management and changes made accordingly based on actual waste generated and how they are managed.		
Root Cause Analysis:	The Assistant managers and staffs in charge who assisted sustainability department in preparing the management plan failed to identify and highlight all the wastes generated specifically by their estates as there were changes in person in charge, EIA and EMP contents and the new employees have not been updated/trained on the changes. Due to the MCO period the sustainability department also did not have sufficient time to physically check the wastes generated.		
Corrective Actions:	management of O.Cs to id respective O.Cs. Manager Sustainability Department r training on EIA, EMP, Sch	d on 10th July 2020 to discus lentify and manage all the v nent to continuously monit egarding any changes to was neduled Waste, Chemical Ha Janagers and staffs is schedu	vaste generated by their tor, update and inform ste management plans. A andling, Water and RTE
Assessment Conclusion:		ve action plan accepted on 28 ner verified in the next assess	

Non-conformity			
NCR Ref #	1929856-202006-N5	Clause & Category (Major / Minor)	7.12.7 (Minor)
Date Issued	3/7/2020	Due Date	Open

Closed (Yes / No)	Yes	Date of nonconformity Closure	Next annual surveillance assessment
Statement of Nonconformity:	Found the HCV managemer	nt plan was inadequate imple	mented
Requirement Reference:	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.		
Objective Evidence:	In Kuala Jelei and Bahau estate, sighted the RTE action plan for year 2020, verification made on line site inspection June 2020, it was found that the weekly basis inspection was not include wildlife inspection as per action plan.		
Corrections:	The latest linesite inspection form which includes wildlife inspection was used at Bahau and Kuala Jelai estates starting from July 2020.		
Root Cause Analysis:	Linesite inspection is done by H.A. in both Bahau and Kual Jelei estate. The H.A. could not recognized the latest linesite inspection checklist as there is no effective date mentioned on the document. Besides, the checklist is not included in the Operating Centers' (OCs) Sustainability Filing System. This filing system is developed by Peninsular Sustainability Department, revised annually and distributed to OCs to ensure that they are using the latest formats of documents.		
Corrective Actions:		on form has been developed OCs and included in Sustaina	
Assessment Conclusion:	As this is minor NC, the effenert assessment.	ctiveness implementation wil	be further verified in the

Oppor	tunity for Improvements
OFI #	Description
OFI 1	The Grievance Procedure and Policies published in the operating unit are mainly in English and publish at location which are hard to be access by workers. Such publication can be improved to include various languages that could be understood by the large demographic workers presence in IOI Gomali Region.
OFI 2	Acknowledge by complainant on the resolution and the time to resolve housing fix can be improved at Kuala Jelei Estate.
OFI 3	The privacy on the consent form for pregnancy test can be improved as all workers are signing in 1 form.
OFI 4	The consultation process can be improved to include what other needs that a new mother may need rather that specific questions.
OFI 5	Training for the WEC Committee and Social Liaison Officer could be improved to ensure the WEC committee could understand the intention of WEC committee and for the Social Liaison Officer to ensure they could understand what is a comprehensive social impact assessment and social management plan.
OFI 6	The weighbridge ticket issued for CSPO include other certification details such as ISCC certification and MSPO certification. Although the products can be demonstrated is being sold as RSPO product through multiple documentations, improvement can be made on the weighbridge ticket to show what is the exact product are being shipped especially when the products are shipped to the sister company that is managing the sales and marketing.



### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

OFI 7	The management need to enhance the mechanism to check consistent implementation of procedures is in place.
OFI 8	For water management plan can be improve on implementation to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment in Sungai Muar and Sungai Sebaling

Positiv	ve Findings
PF #	Description
PF 1	

#### 3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity	Non-conformity				
NCR Ref #	SH-01	Clause & Category (Major / Minor)	4.4.1 (Major)		
Closed (Yes / No)	Yes	Date of nonconformity Closure	30/8/2019		
Statement of Nonconformity:	The water management plan has not taken into consideration the availability of all water sources.				
<b>Requirement Reference:</b>	An implemented water management plan shall be in place.				
Objective Evidence:	Location: Gomali POM The water management plan produced has not included the water sources which were form steam generation and its uses.				
Corrective Actions:	The water management plan for Gomali Mill is revised accordingly. The usage of the steam generated for sterilizer station, press station, kernel station and oil room has been clearly stated and quantified.				
Assessment Conclusion:	As per document review as per below:- Appendix 1: Gomali Mill Water Management Plan 2020 Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was remained close.				

Non-conformity				
NCR Ref #	AL-01	Clause & Category (Major / Minor)	4.4.2 (Major)	
Closed (Yes / No)	Yes	Date of nonconformity Closure	30/8/2019	

Statement of Nonconformity:	Buffer needed for the protection of water courses was not consistently followed and procedure for other buffers /distances during replanting such as at field drains was not clearly defined.		
Requirement Reference:	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.		
Objective Evidence:	Estates: Sagil Noted that Replanting has started and is ongoing for current year onward. Buffer of 3m is not consistent marked eg PR 18A Regent: SOP for Replanting (2017) does		
Corrective Actions:	<ul> <li>a) A buffer zone of 3 metres has been demarcated by painting red on palms or poles beside artificial/field drains. Please refer to Appendix 1.</li> <li>b) The buffer zone for artificial/ field drains has been included in the Standard Operating Procedure (STOP) Land Preparation for New Planting. The STOP has been drafted and is pending approval from top management.</li> <li>c) Buffer zone training to increase awareness to the staff, sprayers and manurers on the activities that should be avoided near waterways</li> </ul>		
Assessment Conclusion:	As per document review as per below:- Standard Operating Procedure (SToP) Land Preparation for New Planting and training record in sampling estate, evidence shown consistency of implementation of the corrective action in bufferzone and verified effective to address the issue. Hence, Major NC was remained close.		

Non-conformity	Non-conformity				
NCR Ref #	SH-02	Clause & Category (Major / Minor)	5.2.1 (Major)		
Closed (Yes / No)	Yes	Date of nonconformity Closure	30/8/2019		
Statement of Nonconformity:	The extent of the boundary for the steep slopes identified as HCV was not determined and demarcated on the ground.				
Requirement Reference:	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:				
	a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.				
Objective Evidence:	Location: Regent estate Inspection made at the identified site with the steep slopes revealed that there was no clear demarcation markers established to indicate the extent of the boundary with the Tebong Forest reserve areas.				

Corrective Actions:	Standard Operating Procedure (SToP) Land Preparation for New Planting have been revised to include distance of buffer zone for forest reserve adopting "Pekeliling Ketua Pengarah Perhutanan Semananjung Malaysia Bilangan 5 Tahun 2014- Penetapan Kelebaran Zon Penampan Mengikut Fungsi Hutan Simpan Kekal (HSK)" which mentions that a buffer zone of 20 metres is required between forest reserve and plantation. The SToP has been drafted and is pending approval from top management. However, Regent Estate has already demarcated an area of 20m from the Tebong Forest Reserve.	
Assessment Conclusion:	As per document review as per below:- Standard Operating Procedure (SToP) Land Preparation for New Planting and training record in sampling estate, evidence shown consistency of implementation of the corrective action in Regent estate and verified effective to address the issue. Hence, Major NC was remained close.	

Non-conformity					
NCR Ref #	JMD-01	Clause & Category (Major / Minor)	6.1.3 (Major)		
Closed (Yes / No)	Yes	Date of nonconformity Closure	30/8/2019		
Statement of Nonconformity:	Progressive reports on the savailable for verification.	status of grievances raised by	stakeholders were not		
<b>Requirement Reference:</b>	Social Impact Assessment				
	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation				
Objective Evidence:	1. At Gomali POM				
	The SIA action plan did not mention any specific person-in-charge and date of completion for the issues raised by stakeholders. Progress reports of the action planned to address the issues raised were also not available.				
	2. At Sagil and Paya Lang Estates				
	The SIA action plan did not mention date of completion for issues raised by stakeholders. Progress reports of the action planned to address the issues raised were also not available.				
Corrective Actions:	In order to monitor the progress of all the issues raised in various meetings, a Sustainability Action Plan Progress Report has been developed to record all the issues and keep track on the updates till the issues are resolved. The specific person-in-charge and date of completion for the issues is included in this reports.				
Assessment Conclusion:	As per document review as per below:-				
	Sustainability Action Plan Progress Report in sampling estate, evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was remained close.				

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Non-conformity	Non-conformity				
NCR Ref #	JMD-02	Clause & Category (Major / Minor)	6.5.1 (Major)		
Closed (Yes / No)	Yes	Date of nonconformity Closure	30/8/2019		
Statement of Nonconformity:	Adherence of private emplo contract with the company	yment agencies in the source is not checked.	e countries to the		
<b>Requirement Reference:</b>	Documentation of pay and o	conditions shall be available			
Objective Evidence:	The procedure to ensure the Private Employment Agencies (PEA) had adhered to the contracts signed with the company, was not available for verification. Evidence of refunding of payments to the foreign workers family members (i.e. of Indian national) made via the PEA, were not adequately verified by the company.				
Corrective Actions:	The HR department has prepared a procedure "Recruitment Process flowchart by Vazir Enterprise" (Appendix 1) and a Recruitment Agency Risk Mapping Checklist (Appendix 2) to check and ensure that the PEA had adhered to the contracts signed with the company The HR department has revised and issued the latest Declaration forms for new Indian workers (Please refer to Appendix 5). They are also using the Recruitment Process flowchart by Vazir Enterprise to ensure that all the documents of workers are in order.				
Assessment Conclusion:	As per document review as per below:- Appendix 1-4: Recruitment Process Flowchart for and revised forms for implementation at the Mill and Estates, submitted via email on 12 Aug 2019 were reviewed. Evidence shown consistency of implementation of the corrective action and verified effective to address the issue. Hence, Major NC was remained close.				

#### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
SH-01	Major	4.4.1	31/05/2019	Closed on 30/8/2019
AL-01	Major	4.4.2	31/05/2019	Closed on 30/8/2019
SH-02	Major	5.2.1	31/05/2019	Closed on 30/8/2019
JMD-01	Major	6.1.3	31/05/2019	Closed on 30/8/2019
JMD-02	Major	6.5.1	31/05/2019	Closed on 30/8/2019
1929856-202006-M1	(Critical)Major	6.6.1	3/7/2020	Closed on 15/9/2020
1929856-202006-M2	(Critical)Major	6.4.2	3/7/2020	Closed on 15/9/2020
1929856-202006-M3	(Critical)Major	2.1.1	3/7/2020	Closed on 15/9/2020
1929856-202006-M4	(Critical)Major	3.6.1	3/7/2020	Closed on 15/9/2020

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

1929856-202006-N1	Minor	3.5.1	3/7/2020	Open
1929856-202006-N2	Minor	6.5.4	3/7/2020	Open
1929856-202006-N3	Minor	3.4.2	3/7/2020	Open
1929856-202006-N4	Minor	7.3.1	3/7/2020	Open
1929856-202006-N5	Minor	7.12.7	3/7/2020	Open
SH-01	Major	4.4.1	31/5/2019	Closed on 30/8/2019
AL-01	Major	4.4.2	31/5/2019	Closed on 30/8/2019
SH-02	Major	5.2.1	31/5/2019	Closed on 30/8/2019
JMD-01	Major	6.1.3	31/5/2019	Closed on 30/8/2019
JMD-02	Major	6.5.1	31/5/2019	Closed on 30/8/2019

#### 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 Gomali POM and Supply bases 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				
<b>Internal Stakeholders</b> Auxiliary police; female workers; contract harvesters; Women Empowerment Committee President; NUPW Union Representative; field workers; general workers; office staff	<b>Union/Contractors</b> NUPW; Mr Chong See Ting; Mr Rickey; Mr Tan Chen Chong			
Government Departments	NGO			
Forest Research Institute Malaysia; Wildlife Department; Forestry Department; Human Resource Department; Tenaganita;	Wetlands International (Malaysia); WWF Malaysia; Greenpeace; Leap Spiral; Indigenous Peoples Network of Malaysia (JOAS); Partners of Community Organisations (PACOS) Trust; Rainforest Action Network (RAN); Sahabat Alam Malaysia			

	Stakeholders comment
1	<b>Feedbacks: NUPW</b> Mr Chantrakumar from the Negeri Sembilan Branch was interviewed during this assessment. Noted that there is was restriction on the workers to join the union. However, Mr Chantrakumar would like to continue to have good engagement with IOI.
	Management Responses:
	Audit Team Findings: The assessment noted that IOI keeps track on the number of union workers and the workers comprises of foreign and local workers. There were no restriction identified.
2	Feedbacks: FRIM
	The concerned raised by the stakeholder is related to the land planning, safety operation especially the trucks carrying the FFBs using housing roads. He was also concerned about dust that is created by the trucks especially during dry season.
	Management Responses:
	Audit Team Findings:
	The assessment team has verified the management plan for such comments. No impact mitigation was identified. Hence non-compliance was raised against 3.4.2 where the management plan was not comprehensive.
3	Feedbacks: Near-by villagers
	The concerned raised by the stakeholder is related to safety operation especially the trucks carrying the FFBs and dust that is created by the trucks especially during dry season.
	Management Responses:
	Audit Team Findings:
	The assessment team has verified the management plan for such comments. No impact mitigation was identified. Hence non-compliance was raised against 3.4.2 where the management plan was not comprehensive.
4	Feedbacks: Contractors for harvester and FFB transport
	Working co-operations with IOI is good. There is no holding of form of payment.
	Management Responses:
	<b>Audit Team Findings:</b> Despite the good working arrangement, the labor supplier contractor has not fully comply with the IOI policies. Hence non-compliance was raised against 6.6.1 related to workers' agreement.
5	<b>Feedbacks: Nearby smallholders</b> There is not issue raised by the nearby smallholders. The land use access remains unchanged and they are allowed to use it.
	Management Responses:
	Audit Team Findings: No further comment regarding this.

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

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	
Dynamic Plantations Berhad	Freehold	2025.4601	No	No	N/A because Dynamic Plantations was shareholder to IOI Corporation Berhad	
Dynamic Plantations Berhad	Freehold	398.8177	No	No	N/A because Dynamic Plantations was shareholder to IOI Corporation Berhad	
Dynamic Plantations Berhad	Freehold	1012.5234	No	No	N/A because Dynamic Plantations was shareholder to IOI Corporation Berhad	
Dynamic Plantations Berhad	Freehold	197.1952	No	No	N/A because Dynamic Plantations was shareholder to IOI Corporation Berhad	
Dynamic Plantations Berhad	Freehold	42.3983	No	No	N/A because Dynamic Plantations was shareholder to IOI Corporation Berhad	

Previous land owner / user comment			
Nil	Feedbacks:		
	Management Responses:		
	Audit Team Findings:		

#### **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

#### 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 Gomali POM 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 Gomali POM and Supply Base is continued.

Report prepared by	Acceptance of Assessment Conclusion	
Name: Muhamad Naqiuddin Mazeli	Name: RAVI TONY	
Company Name: BSI Services (M) Sdn Bhd	Company Name: IOI PLANTATION SERVICES SON BHI Company No: 1050782-T Sustainability, Safety & Health Dept	
Title:	Title:	
Client Manager	Manager - Sustainability, Safety & Health	
Signature:	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)	
Date:	Date: prologo	
24/9/2020	251912020	



#### **Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance		
Principle 1: Behave ethically and transparently					
Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.					
Criteria :	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.					
1.1.1	<b>(C)</b> Documents that are specified in the RSPO P&C are made available to the public.	IOI has established the Stakeholder Request Procedure Flowchart (SOP6.11; Rev 1A; dated 17/01/2017) to manage interested parties documents request. The action time for any request shall be taken within 5 working days.	Complied		
		The list of documents that can be requested by relevant parties is stated in the stakeholder meeting minutes. The list was last brief to relevant stakeholders on 03/06/2020.			
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	The access rights of the document was briefed to the local interest parties through stakeholder meeting conducted on 03/06/2020. The Grievance Procedure and Policies published in the operating unit are mainly in English and publish at location which are hard to be access by workers. Such publication can be improved to include various languages that could be understood by the large demographic workers presence in IOI Gomali Region.	OFI		
1.1.3	(C) Records of requests for information and responses are maintained.	There was not documents request received from operation level.	Complied		



### Revision 10 (Mar 2020)

1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	The relevant procedures for consultation and communication are documented under Stakeholder Request Procedure Flowchart (SOP 6.11; Rev 1A; dated 17/01/2017); Stakeholder Complaint Procedure Flowchart (SOP 6.11; Rev 1A; dated 17/01/2017) and Negotiation Procedure (SOP 6.11; Rev 1A; dated 17/01/2017). The procedures was briefed to the stakeholder on 03/06/2020. The appointed representative for Jasin Lalang Estate is Mr Ahmad Safwan Bin Abu Bakar on 29/08/2019.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	The list of stakeholders dated 01/01/2020 for all sampled estates and mill was made available to the assessment team.	Complied
Criteria	1.2		
The unit o	of certification commits to ethical conduct in all business operations a	nd transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	The IOI Business Ethics, Compliance, Anti-Corruption and Anti-money Laundering Policy and Code of Business Conducts & Ethics published in the IOI Group website ( <u>https://www.ioigroup.com/Default</u> ) governs the ethical conduct of the company. Equal opportunity has been identified in the Code of Business Conducts & Ethics and procedure for recruitment especially for foreign labours are established to manages the conduct of IOI. IOI has implemented Gift and Hospitality Guidelines. These policies are being shared during the annual internal and external stakeholder	Complied
		meeting.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	The annual internal audit conducted on 10/06/2020 and 16/03/2020 for Jasin Lalang Estate and Bertam Estate respectively has included all the company's policies and procedures. Confirmation through interviewing the Internal Auditors that they will assess the compliance	Complied

### **RSPO P&C Public Summary Report**

### Revision 10 (Mar 2020)

Implemer	<b>e 2: Operate legally and respect rights</b> Int legal requirements as the basic principles of operation in any jurisd <b>2.1:</b> compliance with all applicable local, national and ratified international		
2.1.1	(C) The unit of certification complies with applicable legal requirements.	<ul> <li>The applicable Legal requirements had been identified by IOI Ladang Sabah POM and its supply base. It incorporated the latest amendment, that is, OSH (Noise Exposure) Regulations 2019. At the assessed site, the following were noted complied :-</li> <li>1) The scheduled waste competent person for Gomali POM and supply base was available CePSWaM/00651- Mr Ravi.</li> <li>2) Water analysis report was available dated 1 March 2019 conducted by Research centre.</li> <li>3) The ambient air monitoring report was done 3 monthly based, latest report was on December 2019 by ENV Consultancy &amp; Monitoirng Services Snd Bhd. Report no. AA-191202.</li> <li>4) Boundary Noise monitoring have been update according to Biogas implementation in mill operation. The latest report was on April 2019 by ENV Consultancy &amp; Monitoring Services Sdn Bhd (Report ENV/B.NOISE/GOMALIPOM/038).</li> <li>5) The Stack emission monitoring was done by ENV consultancy &amp; Monitoring Services Sdn Bhd on September 2019. The result show was complied with DOE Limits and Malaysian Clean Air Regulation 2014. From the Online Environmental Reporting (OER) AS(B)J31/152/000/049 for Quarter 1 year 2020 showed result of POME sampling was compiled as per Jadual Pematuhan requirement 2500ppm as per below data:-</li> </ul>	Non- compliance

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	Parameter		<sup>th</sup> Week	9 <sup>th</sup> Week	
	BOD (ppm)	_	36	343	
	6) The environme	ental meeting (Enviro	nmental Per	fomance Monitoring	
		done by management			
	Generally, the au	iditors found they we	re in order e	except the following	
	glaring lapses we	ere noted during site	visit infring	ing their applicable	
	legal requirement	ts.	-		
	1. OSH (US	ECHH 2000 Regulatio	ns		
	– at Bahau	Estate, (i) there was	no relabeling	g of Shell Rimula R2	
	Extra 15W-40 of	n the 20-liter HDPE	transferred	container, and (ii)	
	diesel fuel found	at the Chemical store	and Diesel	file at office	
	– at Goma	li Mill there was no r	elabeling of	container (a 2-liter	
	bottle) containing	g lubricant.	-	-	
	2. CLASS 2	013 Regulations			
<ul> <li>Kuala Jelei Estate chemical store displayed expired Safety D</li> </ul>					
	Sheet for Kenly agrochemical and				
	– Bahau E	state did not obtair	n Safety Da	ta Sheet for Shell	
	Advance 4T chen	nical from supplier.	-		
	3. Section 6	50A(4) Employment A	ct 1955		
	– Prabhuna	arayan Chauhan we	orking houi	rs for May 2020	
	exceeded the all	owable limit set by J	TK as per a	pproval letter dated	
	28.6.2019				
	4. Immigrat	tion Act 1959 Section	55B		
	– Kuala Je	lei Estate contractor	CK Permai	Enterprise uses IOI	
	Foreign Labour Q	)uota		-	
	5. Environm	nental Quality Schedu	le Regulatio	ns (2005)	
		: Kuala Jelei Estate 4			
	container located	l outside the Lubricant	t store for dis	sposal as Scheduled	
	Waste not labele	d		-	
		at Gomali Mill (i) con	taminated o	ily rags and carton	
		E Pump house, and (ii			
		at Biogas Plant at wo			
I				I	

...making excellence a habit.<sup>™</sup>

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		Thus, Major Non-Conformity Report was issued.	
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.	The Certification Unit assessed continued to use their established Legal Requirement Register. Legal compliance is ensured primarily via the following process:	Complied
		• It is periodically reviewed by each Operating Unit with guidance from the Group Sustainability and Safety Department to ensure changes in law are updated, compliance met and non-compliance are mitigated.	
		<ul> <li>the respective mill and estate Manager has assigned one executive as PIC responsible for compliance assurance and tracking changes in regulatory requirement.</li> </ul>	
		<ul> <li>Annually, an RSPO Internal Audit is conducted by HQ (lead by Group Sustainability and Safety Executive and assisted by Manager of Mill / Estate independent of Operating Unit being audited) to determine compliance of operations with legal requirements. Audit records were sighted maintained.</li> </ul>	
		<ul> <li>A system established to track changes in laws/regulations are through the following means;         <ul> <li>a) Subscribed to Lexis-Nexis Malaysia</li> <li>b) News release through daily newspaper.</li> <li>c) Law change tracked by book publisher (MDC Book Publications).</li> <li>d) Circulars from relevant association (eg. MPOA, MPOB, MAPA)</li> <li>e) Internet (e-federal gazette, www.e-warta.com.my)</li> </ul> </li> </ul>	



### Revision 10 (Mar 2020)

2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	<ul> <li>The Head office IOI Legal Department alert all operating units on legal updates. Process flow for the Legal updating is shown in SOP reviewed dated March 2018.</li> <li>Boundary markers are clearly demarcated and visibly maintained. Among those visited and verified to be within the boundary perimeter of the CU were:         <ul> <li>Ladang Bahau Block 16A bordering Sg. Sebaling marker pole coordinates 2<sup>0</sup> 48.717'N, 102<sup>0</sup>27.5648'E, and</li> <li>Jasin Lalang Estate boundary pole marking between Sime Darby Kempas and Filed 11A.</li> </ul> </li> </ul>	Complied
Criteria All contra	<b>2.2</b> actors providing operational services and supplying labour, and Fresh I	Fruit Bunch (FFB) suppliers, comply with legal requirements.	
2.2.1	A list of contracted parties is maintained.	List of contracted parties are maintained as per the stakeholder list and specifically for recruitment agencies, it is available in the Foreign Workers Recruitment Guideline & Procedures. In this assessment there were 8 recruitment agencies identified.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers,	IOI conducts due diligence analysis especially on the foreign labour recruitment agencies. The analysis includes compliance to IOI policies, SOP for recruiting confirming to IOI requirements, legally permitted to operate at home country, and use of sub-agent. IOI governs the third parties supplier through terms of reference and	Complied
	service providers and labour contractors, is available.	contracts agreement. Sample of labour supplier with Vazir Enterprise (recruitment agency for Indian labors) and CK Permai Enterprise (for contract labour supply).	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young	The contract agreement with labour supplier CK Permai Enterprise dated 01/07/2019 was reviewed. Additional addendum to the contract	Complied

...making excellence a habit.<sup>™</sup>



### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

#### workers are employed, the contracts include a clause for their was signed on 18/02/2020 indicated workers are at least 18 years old when employed; when young worker between 16-18 years old are protection. employed, contract agreement include a clause for their protection e.g. there should be restrictions on hours of work and overtime, working at dangerous heights, with dangerous machinery, equipment and tools, transport of heavy loads, exposure to hazardous substances or processes and difficult conditions such as night work; no contract substitution; and shall have valid passport and work permits. Please refer to indicator 6.6.1 for more details. Criteria 2.3 All FFB supplies from outside the unit of certification are from legal sources. Not Applicable as there the mill does not purchase any FFB sourced 2.3.1 (C) For all directly sourced FFB, the mill requires: Not from other company or smallholders. Applicable • Information on geo-location of FFB origins • Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder One or more supporting documents for claims Valid MPOB license 2.3.2 For all indirectly sourced FFB, the unit of certification obtains from Not Applicable as there the mill does not purchase any FFB sourced Not the collection centres, agents or other intermediaries, the evidence from other company or smallholders. Applicable as listed in Indicator 2.3.1. **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.

...making excellence a habit."



### Revision 10 (Mar 2020)

3.1.1	<b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Mill annual budget and management plan were documented with five years projection that include monthly breakdown for FFB production, CPO, PK, OER, and KER, costs of production, CAPEX and OPEX. There was no scheme smallholder within the supply base. The business plan was available for Gomali POM and its supply base. The estate business plan covers Crop by Year of planting, Replanting Programme, Executive/Staff and Workers Requirement, Mature Oil Palm Costing Statement, General Charges and Capital Expenditure Statement and depreciation.	Complied
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The replanting programme was available at the estates assessed. No replanting in Bertam estate. The annual replanting programme is projected for 10 years as shown in table below:-For Kuala Jelei estate, replanting will be conducted as per below:-YearHa2022/23622023/24652027/281912028/29132In Bahau estate,YearHa2020/212072021/221462022/23131	Complied



### Revision 10 (Mar 2020)

3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	The management review was conducted after internal assessment, latest was on 25 June 2020 as per sample in Bahau, Bertam and Kuala Jelei estate. The issue been discuss was include :- 1. Results of internal audits 2. Customer (internal/external) feedback 3. Process performance and product conformity 4. Status of preventive and corrective actions 5. Follow-up actions from management reviews 6. Changes that could affect the management system 7. Recommendations for improvement 8. Complaints and grievances 9. Resource needed.	Complied
		and environmental performance and develops and implements action pl	lans that allow
3.2.1	<b>(C)</b> 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.	The aspect and impact of environmental was review May 2020, this assessment was include all activity in estate such as store, chemical activity, rubbish and etc. The action plan was available for each issue been raise. The continuous improvement plan was available for year 2020, sample on waste reduction, dried POME been using in field which high lateritic area as per recommendation from senior manager (report 10 Jan 2020) at field 12A. For Bahau estate Implementation of dried POME was done in 05D. Continuous improvement plan for each estate and the mill is in place and the plans are through stakeholders input. However please refer to indicator 3.4.2 regarding the impacts assessment.	Complied



### Revision 10 (Mar 2020)

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.	The RSPO metrics template has not been finalized by RSPO Secretariat. Hence this requirement is not yet applicable during this assessment. The ACOP was submitted on 05/06/2020. However the RSPO website has not updated with the latest information. BSI had received notification from RSPO Secretariat regarding members that has not submitted ACOP for 2019. IOI name is not within the list. The GHG reporting was submitted to the assessment team for assessment. Completing this assessment, the PalmGHG will be submitted to RSPO Secretariat. IOI have established the IOI Environmental & Social Template monitoring the environmental, social and safety performance of the company. IOI has also published their annual sustainability report in the IOI Group website.	omplied
Until such	on provided to Certification Body and feedback via RSPO Secretariat is	ing reporting e.g. PalmGHG, Annual communication of Progress (ACOP) repo	orting, and
Operating	g procedures are appropriately documented, consistently implemented	and monitored.	
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	covers procedures as required by the RSPO P&C MYNI:2019.	omplied
		The company's management process and operations are guided by the following documents:	
		<ol> <li>Group Standard Operating Procedures (StOP) for Palm Oil Mill Operations, 01/07/2017</li> <li>Group Safe Operating Procedures (SaOP)</li> <li>Group Occupational Safety and Health Guidance for Estate Workers (in Bahasa Malaysia)</li> </ol>	

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		<ul> <li>4. Group Standard Operating Procedure (StOPs) for estate dated 18 Feb 2017</li> <li>5. Group Social Impact Assessment and Management Action Plans (Guidance Document) dated 10 Oct 2011</li> <li>6. Group Environmental Impact Assessment and Management Action Plans dated December 2007.</li> <li>7. Internal Audit procedure dated 3 May 2018</li> <li>The StOPs reflect best industry practices as detailed in IOI's agricultural policy document. Aside from StOPs for operations of mill and estates there exists also SaOPs for management but not limited to:</li> <li>Consultation and communication</li> <li>Negotiation on compensation.</li> <li>Guidance and procedure for gifts and hospitality.</li> <li>Selection and contracting of contractors including recruitment agencies</li> <li>Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination.</li> <li>Procedures for Supply Chain.</li> <li>Internal Audit procedure for Supply Chain</li> <li>Remediation and Compensation Procedure (RaCP)</li> <li>Accident and emergency procedures</li> <li>Proper disposal of waste material</li> </ul>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	StOPs for mill processing of FFB (full cycle from receipt to producing palm oil and its by-product including generation of wastes) and for estate Oil Palm operations (from land clearing, nursery management, replanting, crop production and field maintenance to replanting) as well as SaOP for overall management are implemented in all the Operating Units evaluated. The individual mill/estate StOP and SaOP	Complied

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		<ul> <li>have become standard practice understood by all mill and estate field management staff as well as workers.</li> <li>Procedures are provided to all level of employment (management, staff and workers), plus induction training and refresher training given to ensure all workers are competent, skilful and follow procedures laid out.</li> <li>The objective being standard application and consistent implementation of procedures.</li> <li>A comprehensive monitoring framework is in place. The mill/estate management team/structure monitoring is in the form of task supervision and satisfactory task completion forms, for example, checks on safety, environmental, quality (FFB traceability, OER, KER, etc.), and social serve as records of compliance monitoring implementation.</li> <li>To complement the above: -</li> <li>Internal Audit was conducted annually Internal audit – conduct by sustainability department dated 16 March 2020</li> <li>Plantation control visit more to ensure best practice implementation was done on 23 Jan 2019</li> </ul>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	Documented information such as records of monitoring, reports and completed check forms and any subsequent action required together with follow-up until closure of complaints and grievances, non- conformity/non-compliance were available and maintained. Sampling on POME and EFB monitoring record available in sample estate as per below:-FielddatePOME tonnageEFB Tonnage	Complied

...making excellence a habit.<sup>™</sup> Page 47 of 133

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	Jelei) PM12A (Kuala Jelei) PM04B	20/1/2020 7/2/2020 17/6/2020	23.76MT 16.77MT -	- - 61.09MT	
	(Bahau) PM05C (Bahau)	10/1/2020	-	19.70	
<b>Criteria 3.4</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is under and monitoring plan is implemented and regularly updated in ongoing operation		lantings or ope	rations, and a sc	cial and environmenta	I management
3.4.1 <b>(C)</b> 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.	SIA for the sample of the estate. The s mainly issues raise Please refer to indi There is no new Environmental Poli signed by the grou The Sustainability Assessment and do Management Actio Gomali POM and the annually spread on workstation and action Management Action documented and in like:	SIA are conducted by stakehold licator 3.4.2 and plantings at t licy and docum pCEO and grout team has est ocumented it in on Plans and he assessed est ver Mar - Apr ctivity in the mat tion Plan are implemented in magement and con	ted and review a ers d 3.7.1 for more his CU. IOI Gro ented in Sustair up Head of Susta ablished the Envi Environmental I Continuous Imp tates. The asses 2020. The asses 2020. The asses and at the estand continual iclude key indica	oup has established able Palm Oil Policy inability in Feb 2017. vironmental Impacts mpacts Assessment, provement Plans for sment was reviewed sment covers on all	Complied

RSPO P&C Public Summary Report

### Revision 10 (Mar 2020)

3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	The Stakeholder consultation has not yet completed due to Covid-19 pandemic. However the management plan for Bertam and Jasin Lalang has developed following to the most recent information received from stakeholders.	Complied
		The management plan was not completed comprehensively. Some of the missing impacts includes:	
		<ol> <li>The Bahau Estate management plan has not included issue regarding pricing of grocery shop highlighted during the JCC meeting.</li> </ol>	
		<ol> <li>The Bertam Estate management plan has not included concern raised in the grievance records i.e. speed of vehicle and dust created by the vehicle.</li> </ol>	
		3. At Bahau Estate, despite electricity is being subsidized by the company, the electricity charge for workers that uses more than 23kwh per person is charged following the industrial rate. The company shall look into this impact to workers' salary as the workers can be benefited from domestic rate.	
		The environmental management and monitoring plans have been sighted developed. It include:	
		At Gomali POM	
		1. The commissioning of the biogas plant to reduce methane gas emission from effluents. This project is still on-going	
		2. Install boiler emission control system to improve emission at the boiler station.	
		At Estates:	

## RSPO P&C Public Summary Report

### Revision 10 (Mar 2020)

		1) Increase planting of beneficial plants (Turnera subulata, Cassia cobanensis and Antigonon leptopus) along the roads for pesticides	
		reduction	
		2) Recycling use of fertilizer bags and washing of inner lining bags prior to disposal as plastic waste.	
		3) Increase cover crop planting at stream buffer zones, steep slopes for better soil erosion control.	
		4) Increase construction of more barn owls to overall ratio of 1:20	
		5) Monitoring of contagious and vector-borne diseases at estate clinics.	
		The CU too has implemented Guidelines and Measures for COVID-19 and Movement of Control Order following announcement by MPOA where the Malaysian Government (Cabinet) has consented to allow the plantation industry to resume operation and it had been strictly observed followed.	
3.4.3	<b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	The management plan and monitoring plan are share during stakeholder meeting conducted annually. The Environmental Performance Committee at each Operating Unit meets quarterly and as part of its responsibility is to oversee management of the environment and ensure that monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Complied
Criteria	3.5		
A systen	n for managing human resources is in place.		
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and	IOI has established the Foreign Workers Recruitment Guidelines & Procedure in Malaysia dated October 2017.	Non- compliance
	made available to the workers and their representatives where applicable.	There is no employment procedure for local recruitment, Thus Minor NC was been issued.	
3.5.2	Employment procedures are implemented and records are maintained.	The implementation of the Foreign Workers Recruitment Guidelines & Procedure can be verified through implementation of worker's	Complied
		makina avcallanca a habit™	

...making excellence a habit."



RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		agreement. The procedure is also generally been followed by labor supplier CK Permai Enterprise.	
Criteria			
An Occu	pational health and safety (H&S) plan is documented, effectively com	nunicated and implemented.	
3.6.1	<b>C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	All sites visited at the CU had its HIRARC made available for the audit team to view. They continued to use their established HIRARC Register. The risk assessment had been carried out and annually reviewed by each operating Unit on operations where health and safety is an issue in order to determine the significant hazards. Activities of all persons having access to workplace had been identified and assessed. However, a Major Non-Conformity Report was issued as the CU risk assessment had not included Human Fatigue working long hours.	Non- compliance
		Other than the above, substances hazardous to health had been risk assessed by appointed DOSH-Registered consultant at all visited sites. Copy of Chemical Health Risk Assessment report was sighted available and remained valid.	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	<ul> <li>An annual Safety and Health Program for year 2020 had been developed at each Operating Unit. A table Program by month was sighted. It is grouped as follows into</li> <li>(a) OSHA 1994 where <ol> <li>3-monthly Safety and Health Committee,</li> <li>Workplace Inspection,</li> <li>Workers Medical Surveillance (by OHD) before commencement of work and at 12-monthly interval,</li> <li>Chemical Health Risk Assessment, 5 yearly,</li> <li>Chemical Exposure Monitoring,</li> </ol> </li> </ul>	Complied

...making excellence a habit."

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

vi. Audiometric test
vii. Chemical Register
viii. submission of accident form to DOSH JKKP 8 before 31st
January of the following year and JKKP 6 depends on the type accident
as per NADOOPOD Regulations 2004 and
ix. Permit To Work, before start of dangerous work
(b) Emergency Response Plan
i. Annual Emergency Response Team Training
ii. Annual Emergency / Fire drill
iii. Annual First Aider Training
iv. Monthly Fire Fighting Equipment Inspection, and
v. Monthly First Aid Box Inspection and Replenishment
(c) Building and Structure
i. Monthly Earth Leakage Circuit Breaker (ELCB) Inspection
ii. Weekly inspection of workers housing
(d) Safety & Health Department
i. Annual SHE Audit
ii. Monthly Accident Frequency Rate (AFR) Report
(e) Vehicle, Machinery and Equipment Safety
i. Daily Vehicle Inspection
ii. Yearly Vehicle Maintenance Training

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		<ul> <li>iii. Machinery Certificate of Fitness Renewal by DOSH – every 15 month</li> <li>iv. Monthly LEV Inspection (Internal)</li> <li>v. Yearly LEV Inspection (External)</li> <li>(f) Estate / Mill Training Program</li> <li>Mill – i. Annual SOP training for each Work station</li> <li>ii. Hearing Conservation Training – yearly</li> <li>iii. Confined Space Entry – Yearly</li> <li>iv. Working at height – yearly</li> <li>v. PPE training - yearly</li> </ul>	
		Estate - i. Annual SOP training by each Job Position / Task performed ii. PPE training - yearly	
Criteria 3 All staff, w	<b>3.7</b> vorkers, Scheme Smallholders, outgrowers, and contract workers are	appropriately trained.	
3.7.1	<b>(C)</b> 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.	Formal training programs for year 2019/2020 was published and made available at beginning of each financial year and implemented. The program covered all aspects of the RSPO requirements, with regular assessments of training needs were presented to auditors by both estates and mill. There is no Scheme Smallholders at this Certification Unit. The training programs were for all categories of workers.	lied
		Training identification and needs analysis were applied to recognize the staff and workers' deficient skills or knowledge gaps, particularly, in aspects of RSPO P&C and the Supply Chain Certification System. The training on RSPO awareness included Sustainability program on	

...making excellence a habit."

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	<ul> <li>the policy and objectives of the environmental management and improvement plans,</li> <li>safe work practices utilizing Standard Operating Procedures,</li> <li>good agricultural and mill practices,</li> <li>legal compliance</li> <li>social program and</li> <li>product traceability</li> </ul>	
	Training for the WEC Committee and Social Liaison Officer could be improved to ensure the WEC committee could understand the intention of WEC committee and ensure the Social Liaison Officer could conduct a more comprehensive SIA and Social management plan.	
Records of training are maintained.	Training was decide by training needs and analysis. Latest training need was done on Jan 2020. Training records were observed updated and maintained. In general, the identified trainings covered the aspects of safety, environment, best practices and social. Sampled a few of the following training records at the respective assessed operating units, FY 2019/20.	nplied
	No. Course name Date	
	1       Safe Operating Procedure Chemical Store Management       13.03.2020         2       Safe Operating Procedure Rat Baiting       15.2.2020         3       Safe Operating Procedure Venomous animal (snake, 17.02.2020)         4       Safe Operating Procedure Buffalo harvesting       18.01.2020         Bertam Estate         1       Emergency / Fire drill       06.02.2020	
	Records of training are maintained.	and improvement plans,       -       safe work practices utilizing Standard Operating Procedures,         -       good agricultural and mill practices,       -       legal compliance         -       social program and       -       product traceability         Training for the WEC Committee and Social Liaison Officer could be improved to ensure the WEC committee could understand the intention of WEC committee and ensure the Social Liaison Officer could conduct a more comprehensive SIA and Social management plan.         Records of training are maintained.       Training was decide by training needs and analysis. Latest training need was done on Jan 2020.       Con         Training records were observed updated and maintained. In general, the identified trainings covered the aspects of safety, environment, best practices and social. Sampled a few of the following training records at the respective assessed operating units, FY 2019/20.       Con         Vo.       Course name       Date       1       Safe Operating Procedure Chemical Store Management 13.03.2020       2       Safe Operating Procedure Ret Baiting       15.2.2020         3       Safe Operating Procedure Ret Baiting       Safe Operating Procedure Buffalo harvesting 18.01.2020       Beets)       4       Safe Operating Procedure Buffalo harvesting 18.01.2020

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		2	Safe Operating Procedure Nursery	25.03.2020	· · · · · · · · · · · · · · · · · · ·
		3			
		4	Safe Operating Procedure Security Guard	03.03.2020	
		Kuala	a Jelei Estate		ļ
		1	Safe Operating Procedure Pre-Mixing	23.06.2020	
		2	Safe Operating Procedure Chemical Sprayers	10.03.2020	
		3	Safe Operating Procedure Tractor driving & Transport	24.06.2020	
		4	Grievance/complaint procedure	23.06.2020	
		Baha	u Estate		
		1	RSPO & ISCC For Managers and Executives	22.03.2020	
		2	Safe Operating Procedure Workshop Operations	28.05.2020	
		3	Safe Operating Procedure Trunk Injection for Bagworm	23.03.2020	
		4	Safe Operating Procedure FFB Harvesting	31.01.2020	
		Gom	ali Palm Oil Mill Segamat		ļ
		1	Contractor and Sub-contractor training on Sustainability matters	05.03.2020	
		2	Sexual Harassment Reporting Procedure	17.03.2020	
		3	Safe Operating Procedure ETP, Lab, Biogas Plant	25.03.2020	
		4	Safe Operating Procedure Waste segregation	24.04.2020	
		5	Company policies	14.03.2020	
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.	tasks Certif	appropriate training is provided for personnel carr critical to the effective implementation of the S ication Standard (SCCS), training was conducted on I critical control point.	Supply Chain	Complied

Supply chain requirements for mills. Procedural note: The below numbering is as per the current RSPO SCCS standard and will be renumbered to become 3.8 and onwards following the revision of the RSPO SCCS in 2019 'D' therefore refers to RSPO SCCS 'Module D – Crude Palm Oil (CPO) mills: Identity Preserved' and 'E' to RSPO SCCS 'Module E – CPO mills: Mass Balance'. Dependir on the supply chain model chosen, the corresponding requirements apply as well as all general requirements (those with numbers only). The RSPO SCCS document uses the terms 'site' and 'organisation' to refer to the unit of certification. Definition				
Identity Preserve d Mill D.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	Gomali Oil Mill Supply Chain Module: Identity Preserved. The management has established the SOP for Supply Chain and Traceability (Mill), RSPOSC/SOP/IP/3, Revision:06, Dated 8/9/2018 and RSPO/SOP/COS/3, Issue 09, dated 7 May 2019 which covered unique running batch number, supply chain model (IP), training, persons responsible, registration and reporting requirements, handling of noncertified product, RSPO stamps (IP), authorization, delivery/goods received. This Mill only process FFB from Gomali estate, Paya Lang estate, Bahau estate, Kuala Jelei estate, Tambang estate, Sagil estate, Regent estate, Bertam estate, Jasin Lang and Bukit Dinding estate. The mill has only received all the certified FFB from its certified estates which belong to IOI Corporation Berhad.	Complied	
Mass Balance Mill E.1	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 can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	N/A	Not Applicable	
Explanat	tion (Volume and product integrity)	1	1	

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

#### The estimated tonnage of CPO and PK products that could D.2 The forecast tonnage of CPO and PK product that could potentially be Complied potentially be produced by the certified mill shall be recorded by produced as per detail below: E.2 the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage FFB: 370,000 mt of CPO and PK products shall be recorded in the RSPO IT platform, CPO: 81,400 mt supply chain certificate and public summary audit report. This PK: 18,315 mt 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 IOI Corporation Berhad RSPO membership number: 2-0002-04-000actual tonnage produced shall then be recorded in each subsequent 00 since 23 August 2010. annual surveillance report. Company has registered in PalmTrace system as follows: Members ID – Gomali Palm Oil Mill & Estates Grouping : RSPO 930588 The mill shall also meet all registration and reporting requirements Licence valid until 22/8/2020 for the appropriate supply chain through the RSPO supply chain Member category : Oil Mill managing organisation (RSPO IT platform). **5.3 Documented procedures** IOI Plantation Services Sdn Bhd has developed procedures to The site shall have written procedures and/or work instructions to Complied 5.3.1 implement the elements of the applicable supply chain model as ensure the implementation of all elements of the applicable supply D.3 below: chain model specified. This shall include at minimum the following: • RSPO Supply Chain – Module D – CPO Mills: Identity Preserved E.3 (IP), Doc. No.: RSPOSC/SOP/IP/3, Rev. 06 dated 8/9/2018 • Complete and up to date procedures covering the Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. implementation of all the elements of the supply chain model 02 dated 20/12/2018. requirements. • Complete and up to date records and reports that demonstrate The procedure was available under title CSFFB,CSPO & CSPK compliance with the supply chain model requirements Traceability System for estates, Mills, Warehouse and trading (including training records). companies. (dated 7 May 2019) • Identification of the role of the person having overall The record was up to date, the latest training was done on 12 May responsibility for and authority over the implementation of 2020. Appointment letter dated 1 May 2020 to Mr Kor Chern Hua as these requirements and compliance with all applicable Supply chain officer was available. requirements. This person shall be able to demonstrate

...making excellence a habit.<sup>™</sup>

## RSPO P&C Public Summary Report

### Revision 10 (Mar 2020)

5.3.2 Internal Audit         5.3.2       The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;       Written procedure available as Procedure Manual Title: Internal Audit; Dc. RSPO/SOP/COC/3; Rev. 09; Issue date: 7/5/2019 and Sustainability Management Procedure Manual Title: CSFFB,CSPO,CSPK Crification Standard and the RSPO Market Communications and Claims Documents.         • Effectively implements and maintains the standard requirements within its organisation.       • Effectively implements and maintains the standard requirements within its organisation.       Written procedure available as Procedure Manual Title: CSFFB,CSPO,CSPK Traceability Management Procedure Manual Title: CSFFB,CSPO,CSPK Traceability System for estates, Mill, warehouses and trading companies.         • 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.       The Internal Audit was of preventives, Follow up actions, recommendation of improvement,         D.4.1/       The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.       The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified		<ul> <li>awareness of the organisation's procedures for the implementation of this standard.</li> <li>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	The identification of role of the person was available in the procedure under 4. Responsibility & Procedure (RSPO/SOP/COC/3). In the appointment letter the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements has been stated.	
3.3.2       audit to determine whether the organisation;       • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.       • Effectively implements and maintains the standard requirements within its organisation.       • Effectively implements and maintains the standard requirements within its organisation.       • Effectively implements and maintains the standard requirements within its organisation.       • The Internal Audit was done on 13 May 2020 by Sustainability team. From the report there are 5 NC was raised by the internal auditor. The corrective action plan also available in the report and close by the auditor on 16 May 2020. Management review meeting was done on 20 May 2020. The management review already discuss regarding to :- management review at least annually. The organisation shall be able to maintain the internal audit records and reports.       • May 2020. The management review already discuss regarding to :- Result of audit, customer feedback, process performance and product conformity, status of preventives, Follow up actions, recommendation of improvement,         D.4.1/ D.4.2       The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.       The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified	5.3.2 Int	ternal Audit		
D.4.1/ D.4.2 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified	5.3.2	<ul> <li>audit to determine whether the organisation;</li> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the standard requirements within its organisation.</li> </ul> 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	<ul> <li>Doc. RSPO/SOP/COC/3; Rev. 09; Issue date: 7/5/2019 and Sustainability Management Procedure Manual Title: CSFFB,CSPO,CSPK Traceability System for estates, Mill, warehouses and trading companies.</li> <li>The Internal Audit was done on 13 May 2020 by Sustainability team. From the report there are 5 NC was raised by the internal auditor. The corrective action plan also available in the report and close by the auditor on 16 May 2020. Management review meeting was done on 20 May 2020. The management review already discuss regarding to :- Result of audit, customer feedback, process performance and product conformity, status of preventives, Follow up actions, recommendation of improvement,</li> <li>The company maintain 3 year record of all documentation. Sampling</li> </ul>	Complied
D.4.2 certified and the tonnage of non-certified FFBs received. Daily summary and monthly summary documented for all the certified	5.4 Purc	hasing Goods In		
FFB. Records verified by internal and external audit. Gomali POM has	,			Complied

...making excellence a habit."

**RSPO P&C Public Summary Report** 

### Revision 10 (Mar 2020)

ceived FFB

...making excellence a habit.<sup>™</sup>

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		Tonnage: 35.08MT/35.10MT Transporter: Ngadiman /muhuntan The mechanism to handling non-conforming product was available under RSPO/SOP/COC/3, issue no 09 dated 7 May 2019 in 5.3 Handling Non – Conformities product.	
5.5 Outs	sourcing Activities		
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall 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).	Outsourcing only applicable for CPO despatch based on the delivered contract with buyers. No outsourcing for PK despatch that have ex-mill contracts with buyers. Sighted the contract agreement as following: - CPO Transport Agreement between Gomali Oil Mill And Makmur Transport Sdn. Bhd. Dated 1 March 2018 - CPO Transport Agreement between Gomali POM And Sasaran Perentas Sdn Bhd,Yewtan Enterprise Sdn Bhd and Pengangkutan Wawasan Kota Snd Bh dated 1 March 2018 Both contracts have been included with addendum of CPO Transport Agreement Addendum on RSPO, MSPO, ISCC & OSHA 1994 as per memorandum dated 30/1/2019 from SVP Processing & Downstream Manufacturing.	Complied
5.5.2	<ul><li>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</li><li>a) The site has legal ownership of all input material to be included in outsourced processes;</li></ul>	Not applicable. No outsourcing activity	Not Applicable

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

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.		
c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.		
d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.		
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.	The POM have a record of all contact detail for transporter and updated.	Complied
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.	No new contractor for outsourcing activity.	Complied
rd keeping		
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.	Gomali POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Complied
	<ul> <li>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.</li> <li>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</li> <li>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.</li> <li><b>d keeping</b></li> <li>The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO</li> </ul>	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.         c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.         d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.         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.       The POM have a record of all contact detail for transporter and updated.         The site shall at its next audit inform its CB of the names and contact for outsourcing activity.       No new contractor for outsourcing activity. <b>d keeping</b> The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO



### Revision 10 (Mar 2020)

5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As per the RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 2 years' period. Sampled records of FFB weighbridge tickets and daily production records for last 2 years were still in place for verification.	Complied
5.9.3	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.	Not applicable. The product of the facility is containing 100% palm oil.	Complied
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Real-time basis recorded in "Month End Production Report" for both CPO and PK. The data is summarised in "CPO/PK Mass Balance Calculation (Internal Process & Output for Financial Year XX/YY". Information available in the format is date, FFB processed, OER, CPO amount [opening, produced and closing] and transferred CPO [mill weight, refinery weight]	Complied
E.5.1	<ul> <li>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.</li> <li>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.</li> <li>c) 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.)</li> </ul>	The record and balnce of all receipt of RSPO was available as per sampling below:- Jasin Lalang Estate Despatch Note: 940353 Weighbridge Ticket: 702173 Date: 29/06/2020 Field: 94F, 15A & 94G Tonnage: 31.42 mt Transporter: Zainuddin	Complied

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		Bertam Estate Despatch Note: 940610/921175 Weighbridge Ticket: 702180/696435 Date: 29/6/2020/24/3/2020 Field:01C & 02B/ 01 E & 01O Tonnage:19.17 MT/29.4 Transporter:Saravan/ Partiban Kualai Jelei Estate Despatch Note: 922261 Weighbridge Ticket: 702176 Date: 29/6/2020 Field: 02D & 10A Tonnage:22.27MT Transporter: Muhu than Bahau Estate Despatch Note: 921816/909067 Weighbridge Ticket: 702183/696445 Date: 29/6/2020/ 24/3/2020 Field: 93D, 94C & 04A/08B, 05G Tonnage: 35.08MT/35.10MT Transporter: Ngadiman /muhuntan	
5.10 Cor	nversion Factors		
5.10.1	Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. 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).	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Complied

...making excellence a habit.<sup>™</sup> Page 63 of 133



### Revision 10 (Mar 2020)

5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
Processi ng 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.	N/A	Not Applicable
5.6 Sales	s and goods out		
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;	Sample of documentation for CPO and PK sold to IOI Global Services Sdn Bhd as below:	Complied
	<ul> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> <li>Any related transport documentation;</li> <li>Supply chain certificate number of the seller;</li> <li>A unique identification number.</li> <li>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).</li> <li>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping</li> </ul>	CPO: Buyer name: IOIGS Seller name: Dynamic Plantations Bhd Delivery date / document issue date: 10/02/2020 RSPO Certificate number: RSPO 930588 (Intertek) Product description: Crude Palm Oil (CSPO/IP) Product quantity: 44,200kg Unique identification number: 75617 (weighbridge ticket number) Buyer name: IOIGS Seller name: Dynamic Plantations Bhd Delivery date / document issue date: 04/10/2019 RSPO Certificate number: RSPO 930588 (Intertek) Product description: Crude Palm Oil (CSPO/IP) Product description: Crude Palm Oil (CSPO/IP) Product quantity: 39,680kg Unique identification number: 75094 (weighbridge ticket number)	

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments.	Seller name: Dynamic Plantations Bhd Delivery date / document issue date: 24/02/2020 RSPO Certificate number: RSPO 930588 (Intertek) Product description: Palm Kernel (CSPK/IP) Product quantity: 39,280kg Unique identification number: 206110 (weighbridge ticket number) The weighbridge ticket issued for CSPO include other certification details such as ISCC certification and MSPO certification. Although the products can be demonstrated is being sold as RSPO product through multiple documentations, improvement can be made on the shipment documents to show what is the exact product are being shipped especially when the products are shipped to the sister company that is managing the sales and marketing.	
5.7.1	<ul> <li>istration of Transactions</li> <li>Supply chain actors who: <ul> <li>Are mills, traders, crushers and refineries; and</li> <li>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.</li> </ul></li></ul>	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly.	Complied
5.7.2	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to	Based on the announcement summary, all the registrations were found to be in order.	Complied

### PF441 RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	do Shipping Announcement / Announcement is based on members' own standard operating procedures.				
	<b>Trace:</b> 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.				
	<b>Remove:</b> RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.				
	<b>Confirm:</b> Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.				
5.11 Cla	ims				
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has obtained Trademark License from RSPO and seen the trademark license# 2-0002-04-100-03 which valid from 19/12/2019 to 18/12/2021.	Complied		
Principle	Principle 4: Respect community and human rights and deliver benefit				
Respect of	community rights, provide equal opportunities, maximise benefits from	n engagement and ensure remediation where needed.			
Criteria 4.1					
The unit	of certification respects human rights, which includes respecting the ri	ights of Human Rights Defenders.			



### Revision 10 (Mar 2020)

4.1.1	<b>(C)</b> 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.	The IOI Group Sustainable Palm Oil Policy rev May 2020 demonstrate the commitments to respect and uphold the rights of all workers including contract, temporary and migrant workers in accordance to the Universal Declaration of Human Rights and the United Nation Guiding Principles on Business and Human Rights (where prohibit retaliation of grievance informer).	Complied
		The policy is seen to be published on notice boards of the sampled estates and mill. Workers are being inducted on the policy when the joined the organization.	
		The policy will be shared again during stakeholders consultations to both internal and external stakeholders. Sample on minutes meeting of Bertam Estate and Jasin Lalang Estate confirms the briefing on the policy.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations.	Workers interview conducted at Bertam Estate confirm that there was no harassment and abuse by managers.	Complied
Criteria	4.2		
There is a	a mutually agreed and documented system for dealing with complaint	s and grievances, which is implemented and accepted by all affected part	ties.
4.2.1	<b>(C)</b> 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.	IOI has newly implemented the revised Grievance Procedure (IOI/P/GO/001; Rev 1; dated 20/01/2020). The procedure is developed following the UN Guiding Principles on Business and Human Right specifically on effective non-judicial towards a complainant of human rights.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	The grievance procedure is published on notice board of estates, mill and housing compound. The grievance procedure is a mandated procedure to be inducted to workers upon starting work. The procedure will also be periodically briefed to the worker on annually	Complied

**RSPO P&C Public Summary Report** 

### Revision 10 (Mar 2020)

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.	<ul> <li>basis. For Kuala Jelei estate, the training was scheduled in Jun 2020. The training was conducted on 23/06/2020 to all workers.</li> <li>Please refer to indicator 1.1.2 for more details</li> <li>The "Green Book" for Kuala Jelei Estate, Bertam Estate and Jasin Lalang Estate shows that any grievance/complaint/request for amenities fixing and the actions taken to resolve is recorded.</li> <li>Acknowledge by complainant on the resolution and the time to resolve</li> </ul>	OFI
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.	housing fix can be improved at Kuala Jelei Estate. The General Terms & definitions of Grievance Procedure (IOI/P/GP/001; Rev 1; dated 20/01/2020) includes an option of a neutral third-party facilitator, mediator or specific expert can be involved to resolve grievances.	Complied
Criteria The unit	<b>4.3</b> 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.	IOI group level contribution to the community includes Yayasan Tan Sri Lee Shin Cheng for education, community welfare, medical assistance and social. In Operating unit level, contribution to community depends on stakeholder requests. Usually contributions are short term contributions includes donations, use of field for activities, assistance to fix amenities for school or praying house.	Complied
<b>Criteria</b> Use of th	<b>4.4</b> e land for oil palm does not diminish the legal, customary or user righ	ts of other users without their free, prior and informed consent	
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	The land ownership for Bahau Estate was transferred from Dunlop Malayan Estate Limited to IOI. The land titles retained in the estate demonstrated IOI is the legal owner of the land since 1990. The lands were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. Quit Rent	Complied

...making excellence a habit.<sup>™</sup> Page 68 of 133

RSPO P&C Public Summary Report

### Revision 10 (Mar 2020)

		payment was further evaluated that IOI still maintain the ownership of the lands.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: 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	<ul> <li>As this is not a new development, FPIC process is not applicable. However the procedures are in place to resolve land matters:</li> <li>1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)</li> <li>2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).</li> <li>3. Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017)</li> <li>Interview with surrounding smallholder and stakeholders confirms that access to temples and road usage is permitted. As this is not a new development, such plan is not necessary.</li> </ul>	Complied
	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	<ul> <li>As this is not new development, such decision is not necessary. However, in case of any land dispute, it will be managed using the following procedure:</li> <li>1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)</li> <li>2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).</li> </ul>	
	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.	<ul> <li>As this is not new development, such implications is not available. However, in case of any land dispute, it will be managed using the following procedure:</li> <li>1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)</li> </ul>	

...making excellence a habit.<sup>™</sup>

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Criteria	4.5		
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	As this is not new development, there is no implementation of FPIC agreements.	Complied
4.4.5	<b>(C)</b> 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.	As this is not new development, such representative is not required for any negotiation. However, to maintain the operations, the surrounding communities are represented by village leaders that is elected by local authorities.	Complied
		<ol> <li>Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).</li> </ol>	
		1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	As this is not new development, it is not necessary to retain information related to propose benefit sharing and legal arrangement. However, in case of any land dispute, it will be managed using the following procedure:	Complied
4.4.3	<b>(C)</b> 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).	Estates location maps and estate operations maps are retained and available. As this is not new development, these maps are no required to developed through participatory mapping.	Complied
		<ul><li>1A; dated 17/01/2017).</li><li>3. Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).</li></ul>	
		2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).	

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	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	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. Quit Rent payments were further evaluated that IOI still maintain the ownership of the lands. Despite this indicator is not applicable due to this certification is not from a new development, IOI still maintain the rights of the user to enter the lands particularly for ritual activities and schools. Interview with stakeholders and nearby villagers confirms this rights.	Complied		
4.5.2	<b>(C)</b> 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.	17/01/2017).	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.	process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated	Complied		



### Revision 10 (Mar 2020)

		1	
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.	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	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.	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Complied
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 anew concession or land title to the operator.	This certification is not from a new development. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	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.	There is no new land acquisition for this certification. Hence the FPIC process is not applicable. However, IOI has documented FPIC procedure in place – Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	Complied
4.5.8	<b>(C)</b> Newlands are not acquired in areas inhabited by communities in voluntary isolation.	There is no new land acquisition for this certification.	Complied
Criteria	4.6		
	otiations concerning compensation for loss of legal, customary or use nmunities and other stakeholders to express their views through their	r rights are dealt with through a documented system that enables indige own representative institutions.	nous peoples,
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	As this certification not new development, it is not required to conduct any prior identification on legal, customary or user rights. However, in	Complied

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	can be demonstrated that local peoples have legal, customary or use ubject to their FPIC and negotiated agreements.	er rights, they are compensated for any agreed land acquisitions and reli	nquishment of
Criteria	4.7		
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.	There is no such negotiation, compensation and payments for this certification as it is not applicable due to this certification is not a new development.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	There is no compensation record for this certification while there is also no smallholders within the certification.	Complied
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	As this certification is not new development, no compensation was involved. However the Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017) is in place to manage any arises compensation.	Complied
		Although there is no identification conducted, IOI still maintain the rights of the existing user to enter the lands particularly for ritual activities and schools. Interview with stakeholders and nearby villagers confirms this rights.	
		<ol> <li>1A; dated 17/01/2017).</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).</li> </ol>	
		<ol> <li>Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)</li> <li>Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev</li> </ol>	
		case of any land dispute, it will be managed using the following procedure:	

### **RSPO P&C Public Summary Report**

### Revision 10 (Mar 2020)

		As this certification not new development, it is not required to conduct any prior identification for compensation. However, in case of any land dispute, it will be managed using the following procedure:	Complied
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	<ol> <li>Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)</li> </ol>	
		2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).	
		3. Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	As this certification is not new development, no compensation was involved. However the Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017) is in place to manage any arises compensation.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Although this certification is not new development, IOI still maintain the rights of the existing user to enter the lands particularly for ritual activities and schools. Interview with stakeholders and nearby villagers confirms these rights.	Complied
Criteria The right		local people who can demonstrated that they have legal customary, or us	er riahts.
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.	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. The FPIC process is not applicable for this certification. However for any land dispute, it will be managed with the following procedures:	Complied
		1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)	

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		<ol> <li>Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).</li> </ol>	
4.8.2	<b>(C)</b> 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.	There is no land conflict recorded for this certification. The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. The FPIC process is not applicable for this certification. However for any land dispute, it will be managed with the following procedures:	Complied
		1. Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)	
		<ol> <li>Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).</li> </ol>	
		3. Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	
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 the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. The FPIC process is not applicable for this certification. However for any land dispute, it will be managed with the following procedures:	Complied
		<ol> <li>Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)</li> </ol>	
		<ol> <li>Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).</li> </ol>	

...making excellence a habit.<sup>™</sup>

RSPO P&C Public Summary Report

### Revision 10 (Mar 2020)

		3. Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	
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)	The land ownerships were transferred from previous plantation owner to IOI. The land titles retained in the estates demonstrated IOI is the legal owner. The lands of the sampled estates were previously developed for Rubber estate. The lands were previously agriculture land and not customary lands. The FPIC process is not applicable for this certification. However for any land dispute, it will be managed with the following procedures:	Complied
		<ol> <li>Grievance Procedure for Land Owner Issues (SOP: 6.11; Appendix 4; Rev 1A; dated 17/01/2017)</li> </ol>	
		2. Land Use Compensation Procedure (SOP: 6.11; Appendix 8; Rev 1A; dated 17/01/2017).	
		3. Negotiation Procedure Through Free, Prior and Informed Consent (SOP: 6.11; Appendix 5; Rev 1A; dated 17/01/2017).	
•	e 5: Support smallholder inclusion mallholders in RSPO supply chains and improve their livelihoods throu	gh fair and transparent partnerships.	
Criteria	<b>5.1</b> of certification deals fairly and transparently with all smallholders (Ind	ependent and Scheme) and other local businesses.	
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Starting from this recertification, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders crops. Hence it is not necessary to publish such price.	Not Applicable
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders (at least once a year or upon request).	Starting from this recertification, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders crops. Hence it is not necessary carry out this briefing.	Not Applicable



#### Revision 10 (Mar 2020)

5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Starting from this recertification, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders crops. Hence it is not necessary to carry out this analysis.	Complied
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	Starting from this recertification, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders crops. Hence this requirement is not applicable.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	Starting from this recertification, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders crops. Hence such contract is not required.	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Starting from this recertification, IOI Gomali Region has excluded Sembilan Tani outgrower for certification. Meanwhile they have not received any smallholders crops. Hence such payment is not applicable	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	There is no smallholder suppliers within IOI Gomali Region. However the weighbridge has been periodically calibrated. The last calibrations for the weighbridges was conducted on 08/08/2019. The calibration was conducted by Metrology Department and remains valid during the assessment.	Not Applicable
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.	There is no smallholder suppliers within IOI Gomali Region.	Not Applicable



#### Revision 10 (Mar 2020)

5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Since there is no smallholder suppliers, there is no specific grievance mechanism for smallholders. However the company general Grievance Procedure (IOI/P/GP/001; rev 1; dated 20/01/2020) is observed to manage any grievances.	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.	There is no smallholder suppliers within IOI Gomali Region.	Not Applicable
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).	There is no smallholder suppliers within IOI Gomali Region. However, due to the recertification process, Sembilan Tani outgrower was excluded temporary due to liability declaration. IOI has committed that they will provide guidance and advise on the process and procedure to complete this assessment and to be submitted to RSPO.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	There is no smallholder suppliers within IOI Gomali Region.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	There is no smallholder suppliers within IOI Gomali Region.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	There is no smallholder suppliers within IOI Gomali Region.	Not Applicable
-	e 6: respect workers' rights and conditions vorkers' rights and ensure safe and decent working conditions.		
Criteria Any form	<b>6.1</b> of discrimination is prohibited.		



### Revision 10 (Mar 2020)

6.1.1	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.	The IOI Group Sustainable Palm Oil Policy rev May 2020 demonstrate the commitments towards non-discrimination and equal opportunity for all employees, regardless of race, nationality, religion or gender. The IOI Group Sustainability Palm Oil Policy rev May 2020 is complemented with the IOI Plantation Equal Opportunity Employment & Freedom of Association Polices dated Oct 2017.	Complied
		The policies are published on notice board at the muster ground and housing notice board. Training of the policies are given during induction and continuous training are given once a year. The training is planned to be conducted in July 2020.	
		Please refer to indicator 1.2.1 for more detail assessment.	
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	Interview and through salary slips of different verification shows that there is no discrimination in terms of salary payment especially for similar work scope.	Complied
	foreign workers.	IOI has committed that no recruitment fee imposed to foreign workers. Please refer to indicator 6.6.1 for more detail assessment.	
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.	Sample of hiring at Bahau Estate for weighbridge clerk was verified. The advertisement of the position was made using banner and published at the main entrance of the estate. The applicant has finish high school and deemed to have required skills for the job. Confirmation and annual appraisal was completed fairly.	Complied
		Prior to the employment fitness was evaluated. The purpose of the evaluation was not used for discrimination purpose. No confidential medical information was shared with the management for hiring decision.	
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.	As per the Guidelines on Reproductive Health (Doc IOI/G/SE/002; rev 01; dated 15/01/2020), only with written consent, the company can conduct pregnancy test. The guidelines has stated that alternative	OFI

...making excellence a habit.<sup>™</sup>

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

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.	<ul> <li>work shall be arranged for female workers and if there is not alternative work, the workers shall allowed to take leave.</li> <li>The flowchart on screening pregnant workers has recommended testing once every 3 months for female workers not handling chemical while once per month for female workers handling chemical. Consent for female workers in Kuala Jelei Estate is available for month of Jan 2020 and Apr 2020.</li> <li>Please refer to indicator 6.6.1 and the privacy on the consent form for pregnancy test can be improved as all workers are signing in 1 form.</li> <li>IOI has made improvement to replace Gender Committee with Women and Empowerment Committee (WEC). The objective of the new committee is strengthen the realization and commitments related to women and their empowerment through increase awareness and</li> </ul>	Complied
		capacity building. For Kuala Jelei Estate, Pn Zuraidah (Chief Clerk) leads the WEC. Please refer to indicator 3.7.1 for more details.	
6.1.6	There is evidence of equal pay for the same work scope.	The female employed in IOI Gomali Region are mainly locals. Comparison on 2 female workers and 1 male workers at Kuala Jelei estate was conducted for general workers. Pay rates including overtime rates were equal for the same work scope.	Complied
Criteria Pay and o wages (D	conditions for staff and workers and for contract workers always meet	at least legal or industry minimum standards and are sufficient to provid	e decent living
6.2.1	<b>(C)</b> 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.	IOI has sign the Collective Agreement with National Union of Plantation Workers (NUPW) on 23/12/2019. Sample of workers agreement are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia).	Complied

**RSPO P&C Public Summary Report** 

### Revision 10 (Mar 2020)

		Interview with workers confirmed that they have signed the agreement and the content was briefed at home country. Upon the foreign workers arriving to the estate, they will be inducted for again of the agreement content and IOI's policies. Please refer to indicator 2.1.1 for more details.	
6.2.2	<b>(C)</b> 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.	Sample of workers agreement are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Please refer to indicator 6.6.1 for more details.	Complied
6.2.3	<b>(C)</b> 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.	20 samples for workers in various operations including harvester, field workers and general workers were verified. Overtime count was appropriate and deduction was deducted fairly following the agreement and approval from the Department of Human Resource. Since the last assessment no dismissal sample was found. There was only absconded workers.	Complied
6.2.4	<b>(C)</b> 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.	All workers are provided with housing facilities that furnish with sanitation facilities, water supplies, electricity and amenities such praying house. Water and electricity are connected to the national supply and grid. Water and electricity usage is subsidized by the company and these conditions are stated in the contract. Interview with workers confirms that there is no issue related to the payment of water and electricity. As the estates are located township, any medical attention needed will be referred to Panel Clinic.	Complied

**RSPO P&C Public Summary Report** 

### Revision 10 (Mar 2020)

		employment is not temporary.	
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.	Both IOI check-roll workers and IOI contractors' workers employ fulltime workers. There is no casual, temporary and day labour hired for core job. IOI contractors' workers are employed for harvesting activities. Interview with workers confirmed that they understood their	Complied
		IOI is currently actively involved in DLW study involving peninsular of Malaysia and Sabah by phases with Monash University. Documented evidence such as 'Decent Wages For Workers On Malaysian Plantations' study report dated 01.04.2019 sighted. The studies were initiated by IOI but was leading by the Monash University Researcher. The initiative is fully independent and unfed by the research university.	
6.2.6	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.	Workers are paid according to Malaysia Minimum Wage Council 2018; i.e. MYR1,100 per month. For works based on piece rated, they are calculated and workers are guaranteed with minimum wage upon completion of the targeted set by the mandore and staff. Prevailing wages has been calculated.	Complied
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	During the Covid-19 pandemic, IOI ensure that workers could assessment to food by having dedicated personnel to assist workers to purchase grocery. The sampled estates are located near to township where workers have direct access to shops. IOI provides transportations to foreign workers on weekly basis to purchase food/grocery.	Complied
		The housing compound was visited the conditions and cleanness is acceptable. Please refer to indicator 3.4.2 for more details.	

RSPO P&C Public Summary Report

#### Revision 10 (Mar 2020)

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. (C) A published statement recognising freedom of association and Complied 6.3.1 The IOI Group Sustainable Palm Oil Policy rev May 2020 demonstrate right to collective bargaining in national languages (English and/or the commitments to uphold the right of freedom of association and Bahasa Malaysia) is available and is explained to all workers, in recognize the right to collective bargaining and allow trade unions to language that they understand, and is demonstrably implemented. have access to the IOI's workers. The IOI Group Sustainability Palm Oil Policy rev May 2020 is complemented with the IOI Plantation Equal Opportunity Employment & Freedom of Association Polices dated Oct 2017. Consultation was conducted with NUPW Negeri Sembilan Branch Secretary and confirmed that Bahau estate has observed the freedom. Bahau Estate has retained a list of unionized workers consisting both foreign and local workers. 6.3.2 Minutes of meetings between the unit of certification with trade Bahau Estate has held meeting with National Union for Plantation Complied unions or workers representatives, who are freely elected, are Workers (NUPW) on 09/04/2019. Meeting of minutes was shared by documented in national languages (English and/or Bahasa NUPW Negeri Sembilan Secretariat during the consultation. Malaysia) and made available upon request. Additional to union, periodic meetings are held with the workers Joint Consultative Committee (JCC). The JCC allow workers to voice out concerns to the estate management. The JCC is consist of management representative and Employee Consultative Committee (ECC) of both local and foreign workers. Each nationality is represented by their own nationality representative. The last meeting held was 23/06/2020 and 30/04/2020. 6.3.3 Management does not interfere with the formation or operation of Complied The Union representative for Bahau Estate is Mr Suresh A/L registered unions/ labour organisations or associations, or other Ramachandran elected by NUPW on 09/04/2020. ECC are elected by

freely elected representatives for all workers including migrant and

contract workers.

workers. No management interference was observed.

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Criteria 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 Sustainable Palm Oil Policy rev May 2020 demonstrate the commitments towards eliminate all forms of illegal, forced, bonded, compulsory or child labor. Additional addendum to the service contract for labor supplier CK Permai Enterprise signed on 18/02/2020 indicated workers are at least 18 years old when employed; when young worker between 16-18 years old are employed, contract agreement include a clause for their protection e.g. there should be restrictions on hours of work and overtime, working at dangerous heights, with dangerous machinery, equipment and tools, transport of heavy loads, exposure to hazardous substances or processes and difficult conditions such as night work; no contract substitution; and shall have valid passport and work permits.	Complied
6.4.2	<b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	The estates and mill keeps list of workers containing the date of birth that able to demonstrate the age of the workers. Estates and mill keeps the profile of the workers including photocopy of passport or identification card (for locals). There is no documented age screening verification procedure.	Non- compliance
6.4.3	<b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Verification on the passport details, identity card details and worker list confirmed there is no young person employed or found during this assessment.	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.	The IOI Sustainability Palm Oil Policy is published in the IOI Group website ( <u>https://www.ioigroup.com/Default</u> ). The continuous communication about 'no child labor' is conducted during stakeholders consultation, internal staff training and publication	Complied



		of the policy on notice boards of the estates and mill. Interview with estates management confirmed the 'no child labor' is well understood.	
Criteria	6.5:		
There is	no harassment or abuse in the workplace, and reproductive rights are	protected.	
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	The IOI Group Sustainable Palm Oil Policy rev May 2020 demonstrate the commitments towards promoting a safe and healthy working environment that is free from sexual harassment and other hazards. The IOI Group Sustainability Palm Oil Policy rev May 2020 is complemented with the IOI Plantation Policy on Harassment at workplace dated Jun 2018.	Complied
		The policies are published on notice board at the muster ground and housing notice board. Training of the policies are given during induction and continuous training are given once a year. The training is planned to be conducted in July 2020.	
		Interview with workers, staffs and Auxiliary Polices confirmed that they have not come across any abuse, harassment and sexual harassment.	
6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	The IOI Group Sustainable Palm Oil Policy rev May 2020 demonstrate the commitments protect reproductive health of women employees and promote women empowerment.	Complied
		The IOI Group Sustainability Palm Oil Policy rev May 2020 is complemented with the Guidelines on Reproductive Health (Doc IOI/G/SE/002; rev 01; dated 15/01/2020).	
		Records of pregnant cases was observed in at Kuala Jelei Estate.	
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.	IOI have implemented new mother's consultation form. In Kuala Jelei Estate, consultation was conducted with new mother working as office clerk on 20/04/2020. The consultation is focus on the needs on breastfeeding.	OFI

**RSPO P&C Public Summary Report** 

### Revision 10 (Mar 2020)

		The consultation can be improved to include what other needs that a new mother may need e.g. a storage place for breastmilk extracted during work hours, extra off time.	
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 special procedure was developed under the WEC guidelines on how any female employee can submit any grievance. The Appendix B of the guidelines identified that grievance are submitted through estate "Green Book", HQ hotline number or Employee Consultative Committee (ECC). This approach does not observe anonymity because the "Green Book" can be access by estate managers and any office staff. This is contradicting with WEC guidelines clause 4.7. Furthermore, the ECC is not specific committee that is supposed to manage such grievance. This arrangement contradicts with Objective of the WEC guidelines clause 4.1 and 4.6 where WEC is a platform for women to voice out concern and act as a mediator in resolving complaints on sexual harassment.	Non- compliance
Criteria	6.6:		
No forms	s of forced or trafficked labour are used.		
6.6.1	<ul> <li>(C) All workers have entered into employment voluntarily and the following are prohibited:</li> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> <li>Penalty to the workers for termination of employment</li> <li>Debt bondage</li> </ul>	Sample of employment contracts from IOI check-roll and IOI contractor workers were reviewed. For IOI check-roll workers' contracts has clearly stated the passport keeping is the choice of the workers; IOI will bare all recruitment fees; overtime is based on request of workers; there is no debt and wages withholding; and workers can terminate the contract with 14 days' notice. However, the agreement stated that if a worker does not fulfill the first 2 years' contract, upon 14 days' notice a worker has to repay the recruitment cost of 100% if service less than 6 months and 50% if service for 6 months or more but less than 2 years. For contract workers under CK Permai Enterprise, there is no termination clause and the IOI's passport keeping policy was not followed. In IOI check-roll worker's contract, if the workers does not	Non- compliance

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	Withholding of wages	fulfill the first 2 years' contract, the workers that want to terminate the employment contract has to repay the recruitment cost of 100% if service less than 6 months and 50% if service for 6 months or more but less than 2 years (there is an element for force labor). As per Guidelines on Reproductive Health (Doc IOI/G/SE/002; rev 01; dated 15/01/2020), if there is not alternative work that could be offered by the company, workers shall take leave. If a worker has no leave, they are forced to take unpaid leave or accept any job that does not suit.		
		There were 2 contracts found for Kumar Gurung (passport number 09818738;Nepalese) at Bahau Estate. One dated 15/03/2020 signed at home country and one 17/03/2020 signed upon arriving to estate. Although the content of the contract is the same, by have different contractual date, it is not clear which is considered as the official contract.		
6.6.2	<b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.	<ul> <li>IOI has established several related policies and procedure including:</li> <li>1. IOI Plantation Foreign Wokers Recruitment Guidelines &amp; Procedures in Malaysia dated Oct 2017.</li> <li>2. Minimum Wages &amp; Leave Pay Policies in Malaysia dated Jan 2019</li> <li>3. IOI Group Sustainable Palm Oil Policy dated May 2020.</li> <li>The implementation has been carried out and verified especially on the achievement of the minimum wages of foreign workers. Please refer to indicator 6.6.1 above for more details.</li> </ul>	Complied	
<b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.				
6.7.1	<b>(C)</b> 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	Responsible person for H&S has been appointed by the respective Operating Unit Manager as shown below:	Complied	

...making excellence a habit.<sup>™</sup> Page 87 of 133



are discussed at these meetings, and any issues raised are recorded.	Operating Unit	Appointed PIC	Appointed date		
	Jasin Lalang Estate	Muhammad Amin Bin Abd Rahni	14.05.2020		
	Bertam Estate	Mohd Faizul Nizam Hafiz	02.01.2020		
	Kuala Jelei Estate	Lee Yu Xiang	23.06.2017		
	Bahau Estate	Mohamad Hamdan Bin Hashim	10.07.2017		
	Gomali POM	See Itt Pang	18.02.2020		
	Quarterly meeting has been held as sighted in the Minutes of Meeting record the whole of year 2019 to first quarter 2020 but stopped a while during Covid-19 to comply with Movement Control Order. The lapse in holding meeting was allowed by DOSH. Bertam Estate had just resumed holding the Quarterly OSH Meeting on 22.06.2020 while the rest plan to follow soon.				
		s about health, safety and welfain and any issues raised are recorded			
	<ul><li> Review accide</li><li> Total healthy</li><li> SOP and use</li></ul>	case			

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		<ul> <li>Inspection of First Aid Kit</li> <li>Workplace Inspection</li> <li>OSH training</li> <li>Any other business</li> </ul>	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	An Accident and emergency procedure titled Notification and Investigation (Incidents/Accidents & Dangerous Occurrences) summarized in Flowchart Form, has been established and updated on 17.05.2017. It is available in English and Bahasa Malaysia. The flowchart has been explained to the workforce. Interview with workers showed they have fair understanding regarding the procedures.	Complied
		Each Operating Unit has formed its own Emergency Response Team. The team was trained as company first responders to isolate, contain and neutralize the incident if it is safe for them to do so. Otherwise, the instruction is to summon the local area emergency service providers. Their contact telephone numbers were posted at office noticeboards and at the guard house.	
		Assigned operatives – Mandore, 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. 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. Records of accident including investigation report, DOSH forms JKKP 6 and JKKP 8 were sighted kept and periodically reviewed.	
6.7.3	<b>(C)</b> 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	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.	Complied

...making excellence a habit.<sup>™</sup>

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	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.	Checked during site v operators and the con- were found good. In change to a new set, o or rendered ineffective The operators had bee the job they were ass 3.7.2					
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	Local and Foreign wor (Act 4). Sighted the	ledical care and accident insurance is provided to all employees, both ocal and Foreign workers under Employees' Social Security Act 1969 Act 4). Sighted the last three months payment made to SOCSO on orm A for foreign and local workers was available for reviewed.				
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	All occupation injuries Regulations 2004.	were recorded in acco	ordance to OSH (Nadopod)	Complied		
		Operating Upit	JKKP 8 subr	nitted to DOSH			
		Operating Unit	Date submitted	Reference No.			
		Jasin Lalang estate	31.01.2020	JKKP8/20202/2019			
		Bertam estate	09.01.2020	JKKP8/44269/2019			
		Kuala Jelei estate	JKKP8/43094/2019				
		Bahau estate	09.01.2020	JKKP8/20838/2019			
		Gomali POM	11.01.2020	JKKP8/21564/2019			
		Accident records were	well kept and reviewe	d during the OSH meeting.			

...making excellence a habit.<sup>™</sup> Page 90 of 133



Principle Protect, co	• 7: onserve and enhance ecosystem and the environment.					
	Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.					
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<ul> <li>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).</li> <li>Records of planting of new areas and maintenance of existing areas of beneficial plants and location maps were available (predator host plant map).</li> <li>For Pest &amp; Disease (P&amp;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%.</li> <li>The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the SOP operation.</li> </ul>	Complied			
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.	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			
	<b>Criteria 7.2:</b> 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.	The justification for chemical usage was available as per SOP: 4.6 under appendix: 3.0 dated 1 Jan 2019. This justification was include chemical such as Glyphosate, 2-4D methyl amine, Metsulfuron methyl, Triclopyr butoxy ethyl, Glufosinate and etc. In addition to the above, IOI Group Sustainable Palm Oil Policy, jointly signed by Group CEO and Group Head of Sustainability, under item 4 Existing Plantation, Subheading Environmental Management states that: No use of paraquat and pesticides that are categorised as World Health Organisation Class 1A or1B. The use of other Class 1 Chemicals (such as metamidophos and monocrotophos) approved by the Pesticides Board and included in the MPOB list of approved Pesticide for use in oil palm plantations can only be carried out under strict supervision and in absolutely necessary circumstances such as severe outbreak and critical pest infestation, and, with special method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.	Complied			
7.2.2	<b>(C)</b> 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 record of pesticide use was available in sample estate. The record as per below detail;-	Complied			

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		TypeofchemicalGlyphosateKen AmineKelly	Field ha 1775 1607 455	Litre 1788 83 1943	Ai/ha 0.24 0.02 0.87	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	weed, bagworm a The IPM plan was been done was av Type of Bene plant Cassia Antigonan Turnera	available, from t vailable for year 2 ficial Plan (m) 1294 354 354 x cencus record,	he programm 2020 as per b	e record the beneficial elow detail:- Actual (Todate )(m) 690 235 205 ay 2020 with total 38	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Not applicable b pesticides at the v	Complied			
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.	In sample estate, estate. However categorised as Wo	Complied			

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	The due diligence refers to: 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.	1A and 1B was on October 2018 as per license record (NS/2018/METHA/0011(GL).	
7.2.6	<b>(C)</b> 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.	Pesticides operators have been provided with proper PPE and PPE training. Observed during the site visit the PPE usage by the operators such as google, half face respirator, nitrile hand glove, long sleeve shite, long pants outside of Wellington rubber boot worn and apron were obediently followed. 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.	Complied
7.2.7	<b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.	During visit it was noted that: a. Record of the purchase, storage and use had been properly maintained.	Complied

...making excellence a habit.<sup>™</sup>

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		<ul> <li>b. All stores were secured under lock and key with restricted access.</li> <li>c. Only authorized personnel was allowed to handle the chemicals.</li> <li>d. All the chemicals were stored and segregated accordingly by class.</li> <li>e. Store keeper was trained in the handling all pesticides.</li> <li>f. Provision of ventilation fan and lighting.</li> <li>g. Secondary containment tray placed underneath containers to contain leaks, if any.</li> <li>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.</li> <li>i. Chemical SDS in English language and Bahasa Malaysia and environmental spill kit were kept handy inside the store.</li> <li>j. Concrete cemented floor, bund wall and provision of sump pond.</li> </ul>	
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Used chemical containers were either reused as containers for spraying solution or if for disposal as scheduled waste, they were triple rinsed, holes punched/pierced at the bottom and stored separately as recycle waste. They were collected then by authorized vendor, that is, OLST Petro Chemical Sdn Bhd, a Kualiti Alam registered contractor with DOE for disposal.	Complied
7.2.9	<b>(C)</b> 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.	It is the policy of the company that no aerial spraying of pesticides be carried out. Instead, pesticides spraying performed by operators were sighted at all fields visited.	Complied



and document	and documented action to treat related health conditions, is	The manage	ement conduc erator and beer -				
		Operating Unit	Date	Job Title	No. examir		Remarks
					Male	Female	
			29 June 2020	Premixer	1		
		Estate		Store keeper	1 8		All Fit To
				Sprayer	1		Work
			Workshop Attendant				
			6 May 2020		1		
		Estate		Store keeper	2	1 All Fit 1	All Fit To
			11 June 2020	Sprayer	-		Work
			(for storekeeper)	Workshop Attendant			
		Bertam	15 June 2020	Premixer	1		
		Estate		Store	-		
				keeper	8		All Fit To
				Sprayer	-		Work
				Workshop Attendant			

...making excellence a habit."

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		Bahau Estate	<ul> <li>29 Oct 2019 (for premixer &amp; storekeeper)</li> <li>10 Feb 2020 &amp; 11 June 2020 (for sprayer)</li> <li>11 Nov 2019 (for workshop attendant)</li> </ul>		1 17 4	1	All Fit To Work	
				TOTAL	45	2		
7.2.11	<b>(C)</b> 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 the estates assessed were above 18 years old as verified in the list of sprayers. Also no breast feeding women undertook work with pesticides.						
Criteria	7.3:							
Waste is	reduced, recycled, reused and disposed of in an environmentally and s	socially respon	nsible 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.	For waste management plan, the management already identified such as waste generate by estate have 6 type of waste:- a) Domestic waste b) Sewage c) Garden residue d) Recycle items e) Motor lube containers f) Motor lube spillage				Non- compliance		

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

g) Scheduled waste (SW 305, 306, 410,102,312,404,110 and SW 109)	
For empty container (SW 409) latest dispose dated 17 June 2020 consignment note: 20200617197HL91X to 5E Resource Sdn Bhd ( DOE	
License : 003892 valid until 30 April 2021 (refer email from DOE dated 1 May 2020)	
For Clinical waste (SW 404) disposal was on 11 March 2020 (CN: 0335770) by Kualiti Alam Sdn Bhd. Previously disposal was on 23 Dec	
2019. Inventory of scheduled waste for June referred 83/101/200/001	
available for review.	
In Bahau estate, they generate SW 110,305,312,404,409 and 410 as per Inventory record ASNST(B)95/130/900/111 for May 2020. Sample in SW 404 disposal, record dated 30/6/2020 by Kualiti Alam Sdn Bhd. Consignment note: 0355400.	
In Kuala Jelei estate, inventory of SW was available for review referred ASNST(B)95/130/900/93 for June 2020. Last disposal was on 9 March 2020 at Kualiti Alam Sdn Bhd. (Consg. No. 20200309082PJA3B) for SW 409. For SW 305 (Consg No. 2020030908EWHLXU)	
In Bertam estate, using Kualiti Alam Sdn Bhd for SW disposal. Latest disposal was on 30 April 2020 (Consignment no. 20200430170JZ4SW) for SW 409. 9 March 2020 disposal at Kualiti alam, however sighted the Waste management plan was no show the actual implementation in estate such as;-	
a) In Jasin Lalang estate, SW 301 and 409 was not been include in Waste Management Plan	
b) In Bertam estate, management plan stated SW 404 and 102 was been generate by estate however not sighted any evidence SW 404 and SW 102 in estate.	
c) In Bahau estate, did not have plan for sewage and old tyre	

...making excellence a habit.<sup>™</sup>



		Thus minor non compliance been issued.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	The procedure for proper disposal of waste material was available, Group Environmental Impact Assessment and Management Action Plans dated 29 Feb 2008 under 5.1 Disposal of domestic decomposable waste until 5.6 Disposal of Clinical waste.	Complied
		The training for worker regarding to waste as per below;-	
		<ul> <li>a) Waste segregation training dated 10/3/2020</li> <li>b) Safety work on handling empty chemical container 13/3/2020</li> <li>c) Management on storage of chemical store 13/3/2020</li> </ul>	
7.3.3	The unit of certification does not use open fire for waste disposal.	The management does not use open fire for waste disposal. Referred to procedure Group Environmental Impact Assessment and Management Action Plans dated 29 Feb 2008 under 4.4 Zero burning of domestic waste and as per verification invoice 234/2020/JLE dated 30 May 2020 show Jasin Lalang estate dispose domestic waste into Majlis Perbandaran Jasin ( transport by CMZone Solution). CMZone Solution also manage the recycle waste disposal, as per record. In Bahau estate, disposal of domestic waste was done weekly basis. Sampling on 30 May 2020 been done by MS Mido Enterprise referred to no Invois 237/2020/BE.	Complied
		The company also have establish Zero burning policy dated May 2018 to ensure not use open fire for waste disposal.	

Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.



#### Revision 10 (Mar 2020)

7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	manage soil fertil maintenance of le environmental im	ity to optimise y egume covers ar npact was cove	ish on July 2005. Th ield such as section nd Section 8.0 Manu er under 4.0 Soil ( preparation and pla	5.0 Establish and Iring. To minimise Conservation and	Complied
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	by IOI Research basis according t report was avail	Centre. The sa to agronomist re able for review rears once, sam	have been carried of impling was done p ecommendation acc r. The Soil analysis ple in Bahau estate	periodically yearly cordingly and the s also was done	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.			recycling strategy u luent (POME) was i		Complied
		Field	date	POME tonnage	EFB Tonnage	
		PM12A (Kuala Jelei)	20/1/2020	23.76MT	-	
		PM12A (Kuala Jelei)	7/2/2020	16.77MT	-	
		PM04B (Bahau)	17/6/2020	-	61.09MT	
		PM05C (Bahau)	10/1/2020	-	19.70	
7.4.4	Records of fertiliser inputs are maintained.	The record of Fertiliser record was available for review. The deta ample as per below year 2019:-		view. The details	Complied	
1		Type of Fertilise	r	Amount (MT)		

...making excellence a habit."



		NH Mistrum	1276.0	
		Nk Mixture	1276.9	
		Compound 44+B	177.2	
Criteria	7.5:			
Practices	minimise and control erosion and degradation of soils.			
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.	Based on the soil maps presented a no fragile soil or marginal soil existent		Complied
		Soil series at estates audited are as	s follows:	
		a. At Jasin Lalang estate the Bungor, Colluvium, Local Alluvium,	soil series identified present were: Malacca and Rengam.	
		b. At Bertam estate the soil se Telok, Local Alluvium, Malacca, Mu	eries identified present were: Linau, nchong, and Serdang.	
		c. At Kuala Jelei estate the s Batu Anam, Colluvium, Local Alluviu	soil series identified present were: um, Malacca and Marang; and	
		d. At Bahau estate the soil se Anam, Bungor, Colluvium, Latente, and Munchong series.	eries identified present were: Batu , Local Alluvium, Malacca, Marang	
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 to the Policy of the Company foreca recovery on maturity. No replantin sighted.	5 1	Complied
7.5.3	There is no new planting of oil palm on steep terrain.	There is no new planting at the Cer	rtification Unit.	Complied

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Criteria	7.6:		
Soil surve	eys and topographic information are used for site planning in the estal	blishment of new plantings, and the results are incorporated into plans a	nd operations.
7.6.1	<b>(C)</b> 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, and, no planting on steep terrain and others.	Complied
		Soil map was available for all estates as mentioned in indicator 7.5.1. Viewing of map did not find any planting in marginal and fragile soils.	
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 the visited estates, updated digitally by IOI Research Centre, Gemencheh was available and used to address the planning of infrastructure in the field.	Complied
Criteria	7.7		
No new p	planting on peat, regardless of depth after 15 November 2018 and all	peatlands are managed responsibly.	
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	No new planting in Gomali POM supply base. Not applicable	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	No peat soil in Gomali POM supply base. Not applicable	Not Applicable



	<b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance.			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	No peat soil in sample estate. Not applicable for subsidence	Not Applicable	
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place.	Analysis of water sampling on stream referred JLE/27/06/2020 dated 27 June 2020. This result cover BOD, COD, Ammonium, Suspended solid, Total Solid, pH Value and Total coliform. The result show was below reference range requirement.	Not Applicable	
		In Bertam estate, water flow out from estate dated 17 May 2019 Ref: BTE/17/05/2019. The result also show reduction in BOD, COD, suspended solid and etc. latest was on 11 May 2020.		
7.7.5	<b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months	No peat soil in sample estate. Not applicable for subsidence	Not Applicable	
	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.			



### Revision 10 (Mar 2020)

7.7.6	<b>(C)</b> 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.	The procedure for peat management was available for under topic 4.11 Peat Land Management dated 3 Jan 2019.	Not Applicable
7.7.7	<b>(C)</b> 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.	No peat soil in Gomali POM supply base. Not applicable	Not Applicable
Criteria	7.8		
Practices	s 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.	Documented water management plan verified to be in place for the palm oil mill and estates and was reviewed between March and April 2020. The plan has indicated the water sources for each estate and mill. All four estates visited confirmed that their domestic water supply is mainly from local water authority, that is, from Syarikat Air Melaka Berhad for Bertam and Jasin Lalang Estate, and, Syarikat Air Negeri Sembilan Berhad for Bahau and Kuala Jelei Estate, while Gomali POM treat its source water extracted from Sungai Muar. Water Management Plan took into consideration of the water needs assessment including steam generated by the boiler, water quality analysis, contingency, improvement plan, rainfall data, etc. The treated water at the Gomali POM were tested twice per year for compliance with the Ministry of Health Specification for Drinking Water Quality. Likewise, water samples were conducted at respective estate	Complied

...making excellence a habit.<sup>™</sup> Page 104 of 133

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	b) Workers have adequate access to clean water.	<ul> <li>and the samples were sent to IOI Research Center for further analysis. Water quality test report at POM and estates were verified to be within permissible Ministry of Health specifications.</li> <li>Site visit to field confirmed that there was: <ul> <li>no erosion at buffer zone area seen and the vegetation on both sides of streams in the estates were properly maintained;</li> <li>no evidence of spraying around palms marked as boundary for the buffer zones;</li> <li>workers were trained and aware of the no spraying of chemicals and fertilizer application within the buffer zone;</li> <li>no construction of bunds/weirs/dams across natural waterways passing through the operating units;</li> <li>the quality of the river water was monitored through water sampling analysis at the inlet and outlet of the estates;</li> <li>soil stabilization, run-off control and sediment trapping to mitigate the disturbed earth entering waterways.</li> </ul> </li> </ul>	
7.8.2	<b>(C)</b> 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 reconvers' (April 2017)	clean treated water and is supplied via pipe free of charge. Analysis of water sampling on stream referred JLE/27/06/2020 dated 27 June 2020. This result cover BOD, COD, Ammonium, Suspended solid, Total Solid, pH Value and Total coliform. The result show was below reference range requirement.	Complied
	rehabilitation of riparian reserves' (April 2017).	In Kuala Jelei estate, there are one river (Sg Muar) across the estate, the water sampling was done periodically. Latest result was on 10 June 2019	



### Revision 10 (Mar 2020)

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.	The mill applies the biological system with 9 ponds and 2 tanks (methane capture) in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified where highest BOD=39 ppm while lowest was 23 ppm. The samples were analysed by an accredited laboratory (SAMM No. 247).	Complied
		A Competent Person for Effluent Treatment Plant was available i.e. possessing Certificate No. CePPOME/184528, with validity period 15/8/2018 to 15/8/2019.	
		The treated mill effluent discharge is regularly monitored as prescribed in the Compliance Schedule issued to the mill. Regular monitoring is made on monthly basis and quarterly. In addition, daily site checking on the effluent ponds are made by the person in charge. Report for the effluent parameters were made available during the audit	
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	Water usage in the mill is monitored monthly and 2019 usage was 0.89 m3/ton FFB vs. YTD average is 0.79 m3/ton FFB which is noted to be lower than the industrial norm of 1.2m3 to 1.5 m3/tonne FFB.	Complied
<b>Criteria</b> Efficiency	<b>7.9:</b> y of fossil fuel use and the use of renewable energy is optimised.		



### Revision 10 (Mar 2020)

7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is implemented, monitored and documented.	<ul> <li>Plan for improving efficiency of fossil fuel was spelt out in Renewable Energy Plan for Gomali POM. Among the plans established by the operating unit were: <ul> <li>ensure optimum FFB ramp balance to commence processing</li> <li>closely monitor the diesel engine running hour</li> <li>optimise the diesel engine only running for start and stoppage of the boiler</li> <li>optimise the biogas engine to supply energy to reduce diesel engine hour</li> <li>timely service of diesel powered tractors and machinery to ensure efficient use of diesel &amp; avoid leakages.</li> <li>regular servicing of turbine for a better efficiency and to minimise running of gen-set.</li> <li>educate employees on fuel saving practices</li> </ul> </li> <li>Direct usage of diesel for the mill and estate operations are recorded. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel.</li> <li>The data was also used for GHG calculating by using the RSPO GHG Calculator.</li> </ul>	Complied
		are developed, implemented and monitored and new developments ar	e designed to
7.10.1	<b>(C)</b> 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 are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates: • FFB record book	Complied

...making excellence a habit."

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

		<ul> <li>stock book</li> <li>monthly stock issue</li> <li>stock requisition note</li> <li>Mill:</li> <li>Mill Month End Production Report</li> <li>Monthly production report Part II</li> <li>Flowmeter &amp; running hours record book</li> <li>Bio-gas generation daily monitoring log sheet</li> <li>Effluent analysis report</li> <li>Based on the verification of records, all the sampled issuance was traceable</li> </ul>	
7.10.2	<b>(C)</b> 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).	Not applicable since no new development by the certification unit.	Not Applicable
7.10.3	<b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.	As per identification, the activity of manuring, pesticide usage, and diesel usage was identified as significant pollutants in estate activity. The management develop the pollution reduction plan to ensure optimization in resource implementation.	Complied
		Sample such as usage of buffalo assist for harvesting can reduce machinery (diesel usage) to collect FFB.	
		From the monitoring showed diesel usage for 2018 was 19657 liter and for 2019 was 19715 liter. The ratio diesel usage / FFB produce for year 2019 (1.46 liter/FFB) and year 2018 (1.74 Liter /FFB). It showed 16% reduction of diesel usage.	
Criteria 2 Fire is not	<b>7.11:</b> t used for preparing land and is prevented in the managed area.		



**RSPO P&C Public Summary Report** 

### Revision 10 (Mar 2020)

7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	No new planting. Based on Guideline on Group's Long Term Replanting Planning [A/016-05/2018, dated 20/6/2018], burning is restricted during replanting. There was no replanting activity at all the visited estates. Nonetheless, the management personnel understood the requirements of zero burning.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Water Bowser, portable pump and Emergency Response Team are made available at each Operating Unit and have trained for fire prevention and control measures with their estate.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	During external stakeholder meeting that was carried out at each Operating centres (Estate & Mill), all stakeholder including neighbour was briefed on fire prevention and control measures. Besides that, all operating centres also been prepared Emergency Response Plan (Fire in Field/ Peat Areas in Own or Neighbouring Estate)	Complied
Criteria	7.12:		
	aring does not cause deforestation or damage any area required to pr d HCS forests in the managed area are identified and protected or enh	otect or enhance High Conservation Values (HCVs) or High Carbon Stock anced.	k (HCS) forest.
7.12.1	<b>(C)</b> 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	No new land clearing since 2005. The Jasin Lalang estate was establish on 1910 starting with Rubber Plantation convert into oil palm on 1965. However HCV assessment already been conducted by Sustainability Team on August 2009 By Mr Joushua Mathew. The reviewed done on	Complied
		April 2020.	

**RSPO P&C Public Summary Report** 

### Revision 10 (Mar 2020)

7.12.2	<ul> <li>(C) HCVs, HCS forests and other conservation areas are identified as follows:</li> <li>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.</li> </ul>	Value Resource Netwo Training by Proforest of	ducted based on HCVRN (High Conservation ork) and FSC (Forest Stewardship Council).         on October 2018 regarding to HCV and HCS.         area detail as per below:-         HCV area         0.58         2.68         3.16	Complied
	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.	No new land clearing in	n sample estate.	
	<b>DURAL NOTE</b> for 7.12.2: nent is further clarified under the Interpretation of Indicator 7.12.2 and	d Annex 5 (approved by I	BOG on 12 June 2019).	
7.12.3	Indicator is not applicable in Malaysia context.			Not Applicable
7.12.4	<b>(C)</b> 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	No peat land in sample	estate	Complied

...making excellence a habit."

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	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).		
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.	No HCV area been clear in estate sample. Verified through land statement and interview in estate.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. 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,	For RTE assessment report by Sustainability Team been reviewed on April 2020. The monitoring was done every day by management. From the monitoring record no RTE was sighted in estate. Latest record was June 2020. Training record was conducted on 11 March 2020. For Bahau estate RTE training was conduct on 20 April 2020 and HCV training was on 12 June 2020.	Complied
	harm, collect, trade, possess or kill these species.	In Kuala Jelei estate, the monitoring was done periodically base latest record was available in estate dated 14/6/2020. The RTE assessment been review on April 2020 by sustainability team. A programme to regularly educate the workforce about the status of RTE species is in place under Training needs and plan for year 2020.	
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.	In Kuala Jelei and Bahau estate, sighted the RTE action plan for year 2020, as sample verification found the weekly basis line site inspection in was not include wildlife inspection in line site as per action plan. Latest record was on June 2020. Thus Minor non-compliance been raised during this audit.	Non- compliance
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA	No land clearing in sample estate.	Complied

...making excellence a habit.<sup>™</sup> Page 111 of 133





#### **Appendix B: Approved Time Bound Plan**

Time Bound Plan

Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd (June 2020)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Muliple 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 audit completed in July 2019	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2020	Recertification audit completed in November 2019.	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Apr 2020	Recertification audit completed in November 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 audit 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-04 audit completed in July 2019.	No outstanding issues
6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	ASA-04 audit completed in August 2019	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	ASA-04 audit completed in August 2019	No outstanding issues
8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	ASA-04 audit completed in March 2020	No outstanding issues
9.	Leepang (Sabah) POM	Morisem 5, Leepamg 1, Leepang 5, Permodalan 1, Permodalan 2,	Aug 2012	Re-certified in December 2018	ASA-01 audit completed in October 2019	No outstanding issues.



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Muliple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
		Permodalan 3, and Permodalan 4				
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-02 audit completed in January 2020.	No outstanding issues
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-02 audit completed in January 2020.	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 & Smallholders)	Planned - 2018	Certified in July 2018	ASA-01 audit completed in April 2019.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
14.	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 17 (Outgrowers & Smallholders)	Dec 2017	Certified in May 2018	ASA-02 audit completed in February 2020.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
15.	IOI – Pelita, Sarawak	Sejap and Tegai	Planned – TBC as it is under the resolution process	Uncertified Unit	IOI – Pelita (Sarawak) is in the resolution process (under RSPO CP)	<ul> <li>CICOM completed the Capacity Building Program at the end of June 2019.</li> <li>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.</li> <li>Further and updated progress of this issue could be access through the link below; <ul> <li>(a) IOI Pelita Land Dispute Resolution Plan</li> <li>(b) Current progress on IOI Pelita Land Dispute Resolution Process</li> <li>(c) https://www.ioigroup.com/Content/MEDIA/M_Media?Category=7</li> <li>(d) RSPO Case Tracker – IOI Pelita Status of Complaints</li> </ul> </li> </ul>



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status		on Minimum Requirements for Muliple Ma ertification Systems for Principles & Criteria	nagement Units ,
						in Miri involving men Resolution Plan, 3D C assistance to the affected out of nine affected co coronavirus outbreak re	gratia payment ceremony has been conducted or abers from 4 main communities respectively. community Participatory Mapping, started in Au d communities is being provided by CICOM. By mmunities had their surveys done. Unfortunate eached Sarawak and the government issued Move ipatory Mapping had to be put on hold.	Second stage of the gust 2019. Technical mid-March 2020, six ely, at that point, the
						RSPO Roundtabi Sustainabi Computed Styletan 🗸 stat	c on Polm OI In CI Company Summ New Company IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation	
							Berhad) Local Community of Long Teran Kanan & NGO (Grassroots)	(Respondent) (Complainant)
							COMPLAINT PROGRESS	
							<b>A</b>	
							COMPLAINT BACKGROUND	
						Complaint Reference	N/A	
						Status	Investigation	
						Respondent	IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)	
						Complement	Local Community of Long Teran Kanan & NGO (Grassroots)	
						Date Complaints Submitted	15 Mar 2010	
							COMPLAINT UPDATE	
						DATE	UPDATE	DOCUMENTS
						29 Jan 2020	Phase 2 of the Respondent's Resolution Plan ongoing, Draft ToR for Phase 3 of Resolution Plan submitted to the CP for comments.	
						27 Nov 2019	2nd Phase of Resolution Plan engoing.	
						23 Oct 2019	Phase 2 of the Resolution Plan in progress. Pending further updates from the Respondent.	
						25 Sep 2019	The Respondent is now moving into the second phase of the Resolution Plan. Pending further updates from the Respondent.	
						26 Aug 2019	Pending receipt of further updates from the Respondent on the progress of the Resolution Plan.	
						24 Jul 2019	The Secretariat to issue an email to IOI on the outcome of the CP's deliberation in relation to the Resolution Plan.	

...making excellence a habit.<sup>™</sup>

Page 115 of 133

### RSPO P&C Public Summary Report Revision 10 (Mar 2020)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status		on on Minimum Requirements for Muliple Management Units , Certification Systems for Principles & Criteria
16.	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned - 2019	Uncertified Unit	RSPO Stage 1 was conducted in September 2019	IOI will continue to implementation of its Second quarterly upd to RSPO Investigate On 15th April 2019, 1 of the Complaints Pa (PT BNS), PT Bum SNA), IOI GROUP now officially closed. IOI received an ema RSPO Secretariat has submitted by IOI agi has successfully met is Further and updated (a) <u>RSPO Ketapang</u> (b) (b) <u>RSPO Case Track</u>	il from RSPO that "the Investigation & Monitoring Unit (IMU) of the d finalized the internal review of the action plan and progress reports ainst the Complaints Panel's directives and the IMU concluded that IOI all the requirements set by the Complaints Panel." progress of this issue could be access through the link below; Complaint for PT BSS, PT SKS & PT BNS ker – PT BSS, PT SKS & PT, BNS Status of Complaints
						Complaint Reference Status Respondent	COMPLAINT BACKGROUND NA Case doed PT Subsex Kays Sout (PT SKS), PT Barks Nabel South (PT BNS), PT Barel South Sejahters (PT BSS), PT Savet Nabel April 2016 a selection of 10 Corporation Barbard

...making excellence a habit.<sup>™</sup> Page 116 of 133



No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Muliple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						(c) RSPO Post-Complaints Monitoring The construction of the const
17.	PT BNS, Indonesia	BNS 1, BNS 2, BNS 3 and BNS 4	Planned - 2019	Uncertified Unit	RSPO Stage 1 audit was conducted in September 2019	<ul> <li>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively. On 15<sup>th</sup> 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 Burni 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."</li> <li>IOI received an email from RSPO that "the Investigation &amp; 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."</li> <li>Further and updated progress of this issue could be access through the link below;</li> <li>(a) <u>RSPO Ketapang Complaint for PT BSS, PT SKS &amp; PT BNS</u></li> <li>(b) <u>RSPO Case Tracker – PT BSS, PT SKS &amp; PT. BNS Status of Complaints</u></li> </ul>

...making excellence a habit."

Page 117 of 133

RSPO P&C Public Summary Report Revision 10 (Mar 2020)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Muliple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
18.	PT BSS, Indonesia	BSS 1, BSS 2, BSS 3 and BSS 4	Planned - 2019	Uncertified Unit	RSPO Stage 1 was conducted in September 2019	<ul> <li>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively. On 15<sup>th</sup> 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."</li> <li>IOI received an email from RSPO that "the Investigation &amp; 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."</li> </ul>
						(a) <u>RSPO Ketapang Complaint for PT BSS, PT SKS &amp; PT BNS</u> (b) <u>RSPO Case Tracker – PT BSS, PT SKS &amp; PT. BNS Status of Complaints</u>



		Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
		Comparins System      System Status Of Completes:     Submit New Completes:     System      System Status Of Completes:     System Status Of Completes:
		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) (Respondent)
		Aidenvironment (Complainant)
		COMPLAINT PROGRESS
		COMPLAINT BACKGROUND
		Complaint Reference N/A
		Status         Case closed           Respondent         PT Subses Karya Savit (PT SKS), PT Banktet Naturi Savit (PT BNS), PT Burni Savit Sejahtera (PT BSS), PT Savit
		Respondent PT Subsex Karya Sawit (PT SKS), PT Berkat Nabari Sawit (PT BNS), PT Burni Sawit Sejahtera (PT BSS), PT Sawit Nabari Agro (PT SNA) (a subsidiary of IOI Corporation Berthad)
		(c) RSPO Post-Complaints Monitoring
		C. Search   f V D D   O EN     Recources Smallholder Engagement Rectime Suscentibility College (SRO Credits (MR-PAID))
		ABOUT MEMBERSHIP CERTIFICATION SMALLHOLDERS PAC 2018 IMPACT MYRSPO
		Post Complaints Monitoring
		PT Suikers Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Burni Sawit Classed September BT BSS: "Subaladary of PT Sawit Nabati Ageo (PT SNA), KO CROUP (a Subsidiary of ICO Corporation Berhad) - Case No. CR COOBIE / SAMI COROUP (a
		The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019
		Pending issuance of HGU.

...making excellence a habit.<sup>™</sup> Page 119 of 133



PT KPAN, Indonesia       Under Development       Planned- 2023       Uncertified Unit       NPP and HCSA was approved in April 2018. The NPP public notification could be assessed for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:         19.       PT KPAN, Indonesia       Under Development       Planned- 2023       Unetrified Unit       NPP and HCSA was approved in April 2018. The NPP public notification could be assessed through the link below:         Image: State of the stat	No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Muliple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
	19.	KPAM,	Under Development			approved in April 2018. Currently under	for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:

### **Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2019** for **Gomali POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected `Full version' and `Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2019** for **Gomali POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
СРО	0.59
РКО	0

Production	t/yr
FFB Process	350,263.19
CPO Produced	76395.81
PKO Produced	0

Extraction	%
OER	21.81
KER	4.76

Land Use	На
OP Planted Area	28587
OP Planted on peat	0
Conservation (forested)	77
Conservation (non-forested)	94.07
Total	

#### **Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO₂e	tCO2 e / FFB	tCO₂e	tCO2 e / FFB	tCO₂e	tCO2 e / FFB	tCO₂e	tCO2 e / FFB
Emission					•			
Land Conversion	148931.16	0.44	3290.45	0.49	266.67	0.00	0.93	0.93
CO <sub>2</sub> Emission from fertilizer	19978.54	0.06	438.49	0.06	112.18	0.00	0.12	0.12
NO <sub>2</sub> Emission	12282.35	0.04	267.7	0.04	74.39	0.01	0.09	0.09
Fuel Consumption	1959.66	0.01	73.92	0.01	30.30	0.00	0.02	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-135074.6	-0.40	-3065.5	-0.45	-252.77	0.00		
Conservation Sequestration	-502.68	-0.00	-2.69	-0.00	0.00	0		



Total	47574.37	0.14	1002.37	0.15	230.77	0.10		
*Nota: Includes both estates and smallholders								

\*Note: Includes both estates and smallholders

#### **Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB				
Emission						
POME	12155.93	0.03				
Fuel Consumption	1651.32	0				
Grid Electricity Utilization	0	0				
Credit						
Export of Grid Electricity	0	0				
Sales of PKS	-7645.57	-0.02				
Sales of EFB	0	0				
Total	6161.68	0.02				

#### Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO <sub>2</sub> e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

\*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:				
Divert to anaerobic pond (%)	33.33			
Divert to methane captured (flaring) (%)	66.67			
Divert to methane captured (energy generation) (%)	0			

# RSPO P&C Public Summary Report Revision 10 (Mar 2020)

### **Appendix D: Supply Chain Declaration**

	A. Monthly Records of Certified and Uncertified FFB Received since the last audit (May 2019-June 2020)						
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)			
1	May 2019	34,339.70		34,339.70			
2	June 2019	31,131.44		31,131.44			
3	July 2019	29,300.08		29,300.08			
4	August 2019	27,809.25		27,809.25			
5	September 2019	28,278.83		28,278.83			
6	October 2019	26,206.65		26,206.65			
7	November 2019	20,941.00		20,941.00			
8	December 2019	17,243.28		17,243.28			
9	January 2020	15,608.15		15,608.15			
10	February 2020	19,519.66		19,519.66			
11	March 2020	21,569.57		21,569.57			
12	April 2020	28,221.56		28,221.56			
13	May 2020	28,253.76		28,253.76			
14	June 2020	33,250.17		33,250.17			
TOTAL		361,673.10		361,673.10			
Note: Nil							

B. Mo	B. Monthly Records of Certified CPO & PK since the last audit (May 2019-June 2020)					
No.	Month - Year Certified CPO (mt)		Certified PK (mt)			
1	May 2019	7,169.45	1,632.53			
2	June 2019	6,416.56	1,402.16			
3	July 2019	6,395.77	1,355.05			
4	August 2019	6,340.44	1,387.90			
5	September 2019	6,520.43	1,339.66			
6	October 2019	5,787.01	1,225.00			
7	November 2019	4,802.18	910.25			
8	December 2019	3,844.34	705.71			
9	January 2020	3,564.90	717.14			



Note: Nil			
TOTAL		78,880.89	17,070.96
14	June 2020	7,173.24	1,581.56
13	May 2020	5,925.17	1,302.27
12	April 2020	5,909.98	1,437.46
11	March 2020	4,737.50	1,108.58
10	February 2020	4,293.92	965.69

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) (May 2019 – June 2020)					
No.	Month- Year	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	May 2019	Buyer A	TR-c8155459-38df	3,249.03	-
		Buyer B	TR-29ad8c1d-6832	40.22	-
		Buyer A	TR-088ea527-3836	340.73	-
		Buyer A	TR-b73ca67a-f6ac	6,499.46	-
		Buyer A	TR-d4e38ade-fd2b	717.01	-
		Buyer A	TR-0157a1db-3aef	-	575
		Buyer A	TR-ea40ec0d-49b7	-	500
		Buyer A	TR-cfe02519-e25a	-	787
2	June 2019	Buyer B	TR-3c12e009-1ba3	80.72	-
		Buyer A	TR-28be853a-0645	1,581.03	-
		Buyer A	TR-30846286-9295	2,092.34	-
		Buyer A	TR-e2566c43-0c88	-	587
		Buyer A	TR-8ce891aa-97e0	-	400
		Buyer A	TR-45e34c94-cf8b	-	200
3	July 2019	Buyer A	TR-b135c4f7-c8f7	2,546.87	-
		Buyer A	TR-6923b69e-b4ad	1,005.25	-
		Buyer B	TR-8884a0c3-2395	40.34	-
		Buyer A	TR-8b99f5d7-4f11	500	-
		Buyer A	TR-8cef9f20-19a0	1,391.91	-
		Buyer A	TR-12389390-ec56	2,130.19	-
		Buyer A	TR-0aacb608-f53f	-	592.09
		Buyer A	TR-99199720-354d	-	500
		Buyer A	TR-957c821d-5d0a	-	475

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

9	January 2020	Buyer A	TR-904eca8c-41df	200.06	-
		Buyer A	TR-d2da411f-95cb	-	100
		Buyer A	TR-cde6dfb0-046e	-	250
		Buyer A	TR-2b7637c2-810c	-	100
		Buyer A	TR-760d55f9-3a9b	-	600
		Buyer A	TR-a56b1080-edd3	502.13	-
		Buyer B	TR-fdd55547-562b	152.2	-
		Buyer B	TR-6998c1e3-8154	350	-
	2019	Buyer A	TR-fd213587-4259	501.2	-
8	December	Buyer A	TR-90c25093-f738	7,101.85	-
		Buyer A	TR-ae5e50aa-af73	-	500
		Buyer A	TR-9b67b989-e3bb	-	605
		Buyer A	TR-1553ff21-f63d	-	200
	2019	Buyer A	TR-c959cab0-e0eb	6,102.35	-
7	November	Buyer A	TR-94ddf3dc-b5e3	1,614.68	-
		Buyer A	TR-1f19ee4f-d0b1	-	500
		Buyer A	TR-dbcfd838-5115	-	200
		Buyer A	TR-93e50d02-d4c5	-	505
		Buyer A	TR-27d8bbe5-aad6	-	200
		Buyer A	TR-28d5645b-61b7	2,197.33	-
		Buyer A	TR-4e201276-285c	4,898.71	-
		Buyer A	TR-a02e98fb-0cb2	3,012.34	-
6	October 2019	Buyer A	TR-2a2dc02a-5a33	500	-
		Buyer A	TR-8234ce3b-e9ee	-	300
		Buyer A	TR-9825a29b-0443	-	100
		Buyer A	TR-2aa63cb5-6e19	-	100
		Buyer A	TR-68d131e0-53c6	-	200
		Buyer A	TR-99dab2b9-9546	-	555
	2019	Buyer A	TR-1c90f0ee-2c83	34.95	-
5	September	Buyer B	TR-2f6d3342-cc84	120.17	-
		Buyer A	TR-08a85cff-06f0	_	575
		Buyer A	TR-8d594366-7a4d	_	501.29
		Buyer A	TR-ee141748-2337	-	500
		Buyer A	TR-b56b2303-1ed2	4,696.69	_
	August 2019	Buyer A Buyer A	TR-fea97ea1-fdb6 TR-73de0469-8007	3,674.24	_

## RSPO P&C Public Summary Report Revision 10 (Mar 2020)

	TOTAL		71,507.13	14,661.88
	Buyer B	IR-4ddb6fb1-6ae4	39.79	
May 2020	-			
	Buyer A	TR-f42d31fe-ff69	-	100
	Buyer A	TR-78020daa-1327	-	300
	Buyer A	TR-dfc8ba3c-317b	-	200
	Buyer A	TR-7de6df08-ea86	-	40
April 2020	Buyer A	TR-bb182fb1-2aa9	-	56
	Buyer A	TR-bc2612bb-1750	-	400
	Buyer A	TR-f37fa54c-c5c4	-	39.50
	Buyer A	TR-15210a3a-4dbc	-	100
	Buyer A	TR-d94f9b99-354c	2,977.06	
March 2020	Buyer A	TR-19e45b80-5052	1,000.09	
	Buyer A	TR-09e28335-1615	-	30
	Buyer A	TR-d0f51b3b-2fc9	-	400
	Buyer A	TR-cf37c6f0-99f7	-	15
	Buyer A	TR-0c4e7f72-7adc	-	40
February 2020	Buyer A	TR-0203b59d-e722	5,317.41	
	Buyer A	TR-06e8f59c-7d7a	-	100
	-	TR-3b503915-98b5	504.15	,
	-	TR-07532591-ff92	249.8	
	Buyer A	TR-54a9654d-d760	251.06	
	Buyer A	TR-be92ddfd-5c78	251.42	
	Buyer A	TR-e924355b-3586	503.99	
	March 2020	Buyer ABuyer BBuyer B	Buyer ATR-e924355b-3586Buyer ATR-be92ddfd-5c78Buyer ATR-54a9654d-d760Buyer ATR-07532591-ff92Buyer ATR-07532591-ff92Buyer ATR-0688759c-7d7aBuyer ATR-0203b59d-e722Buyer ATR-0203b59d-e722Buyer ATR-0648759c-7d7aBuyer ATR-0648759c-7d7aBuyer ATR-0648759c-7d7aBuyer ATR-073c6f0-99f7Buyer ATR-06427f2-7adcBuyer ATR-0753251-1615Buyer ATR-0928335-1615Buyer ATR-1945b80-5052Buyer ATR-1945b80-5052Buyer ATR-19210a3a-4dbcBuyer ATR-15210a3a-4dbcBuyer ATR-15210a3a-4dbcBuyer ATR-15210a3a-4dbcBuyer ATR-62612bb-1750April 2020Buyer ABuyer ATR-73fa54c-c5c4Buyer ATR-7de6df08-ea86Buyer ATR-7de6df08-ea86Buyer ATR-7de6df08-ea86Buyer ATR-7de6df08-ea86Buyer ATR-7de6df08-ea86Buyer ATR-7de6df08-ea86Buyer ATR-7de6df08-ea86Buyer ATR-7de6df08-ea86Buyer ATR-6bdd11dc-b8bcBuyer BTR-4ddb6fb1-6ae4	Buyer ATR-e924355b-3586503.99Buyer ATR-be92ddfd-5c78251.42Buyer ATR-54a9654d-d760251.06Buyer ATR-07532591-ff92249.8Buyer ATR-3b503915-98b5504.15Buyer ATR-068659c-7d7a-Buyer ATR-0203b59d-e7225,317.41Buyer ATR-0203b59d-e7225,317.41Buyer ATR-0203b59d-e7225,317.41Buyer ATR-027cf00-99f7-Buyer ATR-0512bb-2fc9-Buyer ATR-0928335-1615-Buyer ATR-19e45b80-50521,000.09Buyer ATR-16e4df08-ea86-Buyer ATR-78e2012b-1750-Buyer ATR-78e2012b-1750-Buyer ATR-78e2012b-1750-Buyer ATR-78e2012b-1750-Buyer ATR-78e2012b-1750-Buyer ATR-78e2012b-1750-Buyer ATR-78e2012b-1750-Buyer ATR-78e2012b-1750-<

Note: Nil

D. Records of CPO & PK Sold under other schemes since the last audit (if any) (May 2019 – June 2020)					
No.	Month- Year	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	May 2019	Buyer C	ISCC	902.15	-
2	Jun 2019	Buyer C	ISCC	460.85	-
3	Aug 2019	Buyer C	ISCC	280.91	-
		TOTAL		1,643.91	-

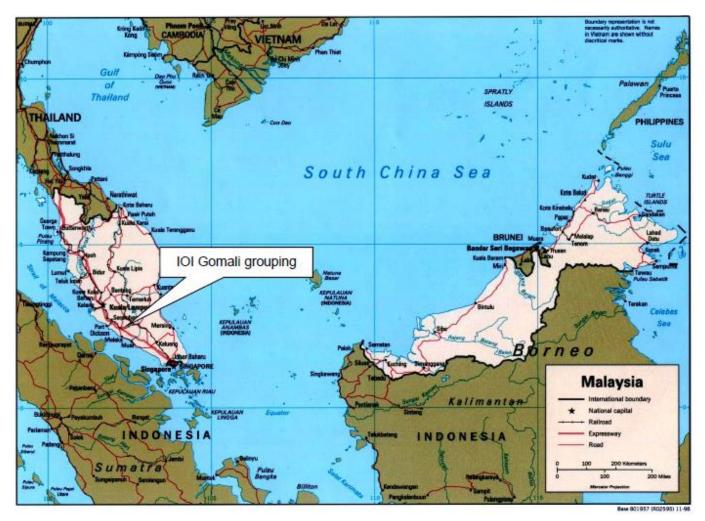
### PF441 RSPO P&C Public Summary Report Revision 10 (Mar 2020)

Note: Nil

E. Records of CPO & PK Sold as conventional since the last audit (if any) (May 2019 – May 2020)				
No.	Month- Year	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	May 2019	Buyer C	1,403.50	-
	TOTAL 1,403.50			
Note: Nil				

F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
Note: Nil			

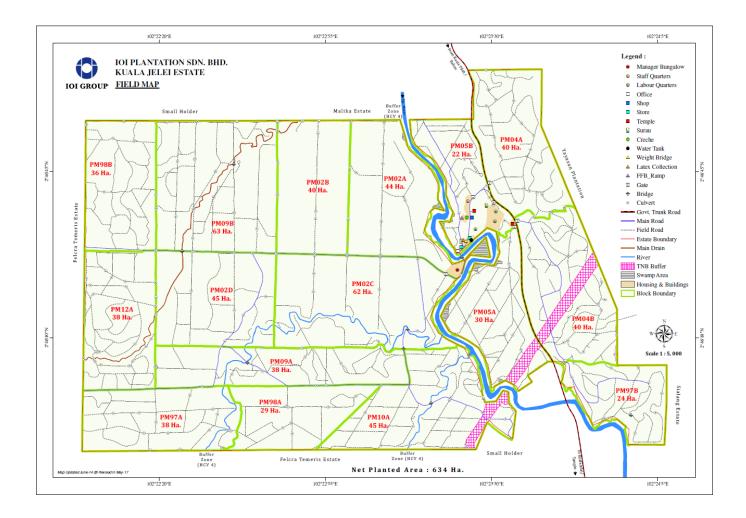




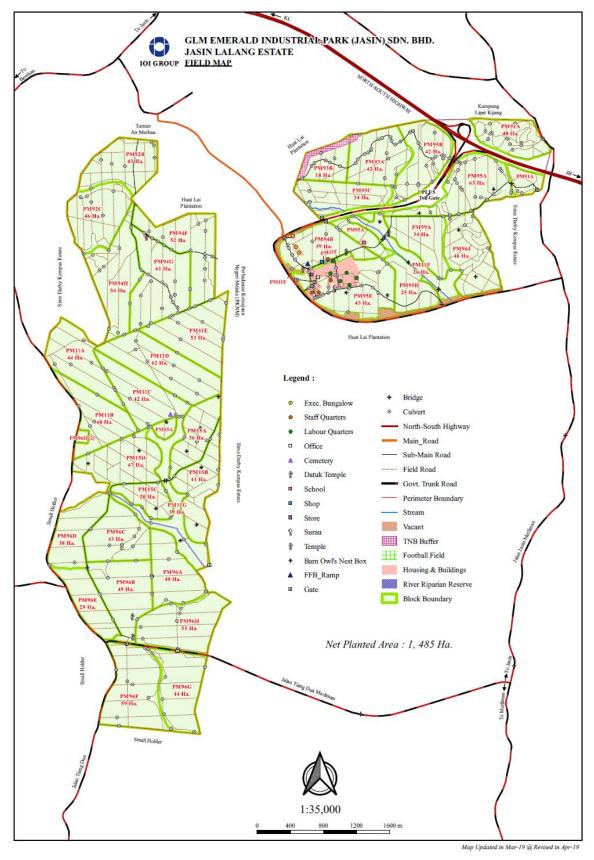
### **Appendix E: Location Map of Certification Unit and Supply bases**



### **Appendix F: Estate Field Map**

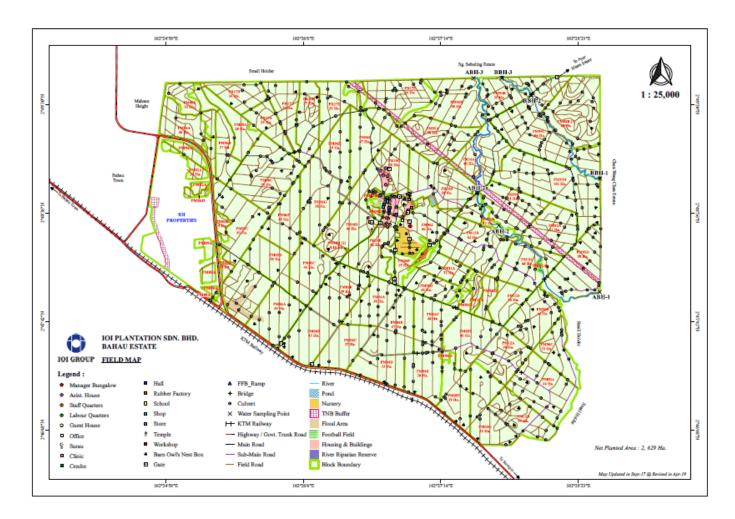




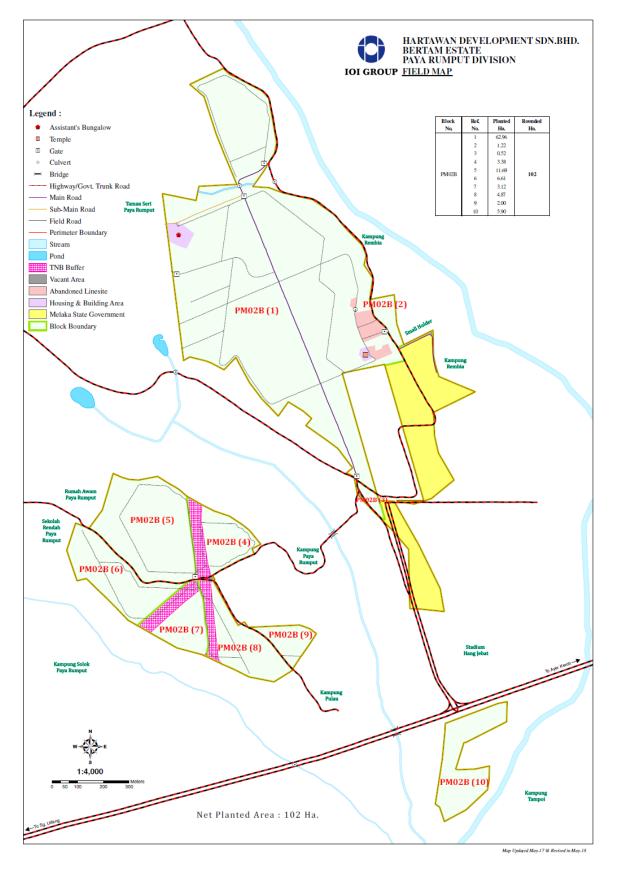


...making excellence a habit.<sup>™</sup> Page 130 of 133









...making excellence a habit. Page 132 of 133

### **Appendix G: List of Smallholder Sampled**

Nil

### **Appendix H: List of Abbreviations**

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