

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2_1)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

Client Company name (Parent Company): IOI Corporation Berhad
Client company Address: IOI City Tower 2, Lebuhr IRC IOI Resort City 62502 Putrajaya, Malaysia
Certification Unit: Halusah Ladang Sdn Bhd - Sakilan Palm Oil Mill and supply base
Location of Certification Unit: Mile 22, Sandakan/ Telupid Road, W.D.T 164, 90009 Sandakan, Sabah, Malaysia
Date of Final Report: 18/06/2021

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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	IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Halusah Ladang Sdn Bhd – Sakilan Palm Oil Mill		
Location / Address	Halusah Ladang Sdn Bhd Mile 22, Sandakan/ Telupid Road, W.D.T 164, 90009 Sandakan, Sabah, Malaysia		
Website	www.ioigroup.com		
Management Representative	Mr. William Siow (Sustainability Manager, Plantation Division, IOI HQ)	E-mail	william.siow@ioigroup.com
Telephone	+603-89478888 (Head Office)	Facsimile	+603-89432266 (Head Office)

2. Certification Information			
Certificate Number	RSPO 543161	Date of First Certification	08/03/2010
		Certificate Start Date	08/03/2020
		Certificate Expiry Date	07/03/2025
Scope of Certification	Palm Oil and Palm Kernel Production		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance 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.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 720886	Ms 2530-3: 2013 Part 3: General Principles For Oil Palm Plantations And Organised Smallholders	BSI Services Malaysia Sdn Bhd	25/01/2023
MSPO 720885	Ms 2530-4:2013 Part 4: General Principles For Palm Oils Mills	BSI Services Malaysia Sdn Bhd	25/01/2023
MSPO 720888	MSPO Supply Chain Certification: 2018	BSI Services Malaysia Sdn Bhd	02/02/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Sakilan POM	Mile 22, Sandakan/ Telupid Road, WDT 164, 90009, Sandakan, Sabah.	5° 50' 21.74" N	117° 50' 37.77" E
Sakilan Estate	Mile 22, Sandakan/ Telupid Road, WDT 164, 90009, Sandakan, Sabah.	5° 50' 49.11" N	117° 53' 15.61" E
Linbar 1 Estate	Mile 45, Sandakan/ Telupid Road, WDT 164, 90009, Sandakan, Sabah.	5° 32' 58.63" N	117° 40' 53.42" E
Linbar 2 Estate	Mile 45, Sandakan/ Telupid Road, WDT 164, 90009, Sandakan, Sabah.	5° 30' 8.31" N	117° 38' 42.87" E

Note: N/A

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sakilan Estate	2,094	0	202.37	2,296.37	91.19
Linbar 1 Estate	2,315	7.24	305.93	2,628.17	88.08
Linbar 2 Estate	1,933	0	278.83	2,211.83	87.39
Total	6,342	7.24	787.13	7,136.37	88.87

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6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sakilan Estate	326	0	0	1,768	0	1,768	326
Linbar 1 Estate	223	2,092	0	0	0	2,092	223
Linbar 2 Estate	833	827	0	82	191	1,100	833
Total (ha)	1,382	2,919	0	1,850	191	4,960	1,382

Note: N/A

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Mar 20-Feb 21)	Actual (Nov 19-Feb 21)		Forecast (Mar 2021-Feb 2022)
		Previous License (Nov 2019 – Feb 2020)	Current License (Mar 2020 – Feb 2021)	
Sakilan Estate	44,611	11,746.35	45,117.15	34,783
Linbar 1 Estate	55,710	12,369.11	45,807.18	62,211
Linbar 2 Estate	17,300	5,938.66	17,726.89	18,771
Total	117,621	138,705.34		115,765

Note:
There are extension on Sakilan POM from November 2020 until January 2021 with approval dated 16/11/2020 as per below:-
FFB: 26,986
CPO: 6,071
PK: 1,350

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (Mar 20-Feb 21)	Actual (Nov 19-Feb 21)		Forecast (Mar 2021-Feb 2022)
		Previous License (Nov 2019 – Feb 2020)	Current License (Mar 2020 – Feb 2021)	
Nil	N/A			N/A
Total				

Note: N/A

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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (Mar 20-Feb 21)	Actual (Nov 19-Feb 21)		Forecast (Mar 2021-Feb 2022)
N/A		Previous License (Nov 2019 – Feb 2020)	Current License (Mar 2020 – Feb 2021)	
Total				

Note: N/A

10. Certified Tonnage				
Mill Capacity: 40 MT/hr	Estimated (Mar 20-Feb 21)	Actual (Nov 19-Feb 21)		Forecast (Mar 21-Feb 22)
	FFB	FFB		FFB
	144,621 mt	Previous License (Nov 2019 – Feb 2020)	Current License (Mar 2020 – Feb 2021)	115,765
		30,054.12	108,651.22	
	CPO (OER: 20.25%)	CPO (OER: 21.91%)		CPO (OER:22.50%)
	29,923 mt	6,424.40	23,800.11	26,048
	PK (KER: 4.29%)	PK (KER: 4.30%)		PK (KER: 5.0%)
	6,446 mt	1,224.66	4,669.10	5,788
TOTAL	N/A			N/A

Note:
There are extension on Sakilan POM from November 2020 until January 2021 with approval dated 16/11/2020 as per below:-
FFB: 26,986
CPO: 6,071
PK: 1,350

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11. Actual Sold Volume (CPO)					
Current License period (Mar 2020 – Feb 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	18,191.57	-	-	-	18,191.57
CPO (MT)	3,288.98	-	-	-	3,288.98
Total	21,480.55				21,480.55
Previous License period (Nov 2019 – Feb 2020)					
CPO (MT)	6,020.59	-	-	-	6,020.59

12. Actual Sold Volume (PK)					
Current License period (Mar 2020 – Feb 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	3,584.62	-	-	-	3,584.62
PK (MT)	611.20	-	-	-	611.20
Total	4,195.82				4,195.82
Previous License period (Nov 2019 – Feb 2020)					
PK (MT)	1,380.90	-	-	-	1,380.9

13. Independent Smallholders Certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	Nil	Nil
IS-CSPKO	Nil	Nil
IS-CSPKE	Nil	Nil

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 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.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **21-24/3/2021**. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on **17/11/2020**.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil (MYNI 2019) was used to guide the assessment of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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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)
Sakilan Palm Oil Mill	√	√	√	√	√
Sakilan Estate	√	√	√	√	√
Linbar 1 Estate	√	√	√	√	√
Linbar 2 Estate	√	√	√	√	√

Tentative Date of Next Visit: November 22, 2021 - November 26, 2021

Total No. of Mandays: 18

2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications <i>(Short description of the team members)</i>
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	<i>(Team Leader or Team member)</i>	
Muhamad Naquiuddin Mazeli	Team Leader	He holds Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years of working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors 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 related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained Safety and Health Officer and completed Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation. He is fluent in Bahasa Malaysia and English.
Muhammad Fadzli Masran	Team Member	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV and environmental. He is fluent in Bahasa Malaysia and English.
Hafriazhar Mohd Mokhtar	Team Member	He holds Bachelor Degree of Chemical Engineer. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He completed his endorsed RSPO P&C Lead Assessor and SCCS standards training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During this assessment, he assessed on the aspects of legal, social and stakeholder engagement. He is fluent in in Bahasa Malaysia and English.

Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

Remote Audit Plan

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Date	Time	Subjects	(MNM)	(VSH)	(EOC)	ICT Planned
Wednesday, 04/11/2020	10.30 - 12.00	Communication on document preparation - Audit plan - Any additional Information	√	√	√	Teleconference, Microsoft Team Meeting, Email
Tuesday, 17/11/2020	8.00 - 8.30	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader • Confirmation of assessment scope and finalize • Audit plan (including stakeholder's consultation) • Verification on previous audit findings and other requirement 	√	√	√	Teleconference, Microsoft Team Meeting, Email
	8.30 - 9.30	Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources. Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.		√		Teleconference, Microsoft Team Meeting, Email
	9.30 - 10.30	Criterion 3.8: Supply chain requirement for mills		√		Teleconference, Microsoft Team Meeting, Email
	10.30 - 11.30	Criterion 7.5: Practices minimise and control erosion and degradation of soils. Criterion 7.8: Practices maintain the quality and availability of surface and groundwater. Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimized Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions. Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High		√		

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Date	Time	Subjects	(MNM)	(VSH)	(EOC)	ICT Planned
		Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.				
	11.30 – 12.30	<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p> <p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p> <p>Criterion 3.5: A system for managing human resources is in place.</p> <p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p> <p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			√	Teleconference, Microsoft Team Meeting, Email
	12.30 – 1.30	Lunch & Break	√	√	√	
	1.30 – 3.00	<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent</p> <p>Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p> <p>Criterion 6.1: Any form of discrimination is prohibited.</p> <p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p> <p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to</p>			√	Teleconference, Microsoft Team Meeting, Email

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Date	Time	Subjects	(MNM)	(VSH)	(EOC)	ICT Planned
		<p>freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> <p>Criterion 6.4: Children are not employed or exploited.</p> <p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p> <p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>				
	<p>3.00 – 5.00</p>	<p>Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p> <p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p> <p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p> <p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p> <p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p> <p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p> <p>Criterion 3.8: Supply chain requirement for mills</p> <p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p> <p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p> <p>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively</p>	<p>√</p>			<p>Teleconference, Microsoft Team Meeting, Email</p>

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Date	Time	Subjects	(MNM)	(VSH)	(EOC)	ICT Planned
		<p>managed using appropriate Integrated Pest Management (IPM) techniques.</p> <p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment</p> <p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p> <p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>				
	5.00 – 5.30	<p>Audit team discussion & findings preparations.</p> <p>Closing Meeting</p> <p>Presentation of report by BSI Lead Auditor – briefing & discussion of findings</p> <p>Acceptance & acknowledgement by Sakilan Palm Oil Mill & Estates</p>	√	√	√	Teleconference, Microsoft Team Meeting, Email

Onsite audit Plan

Date	Time	Subjects	(MNM)	(MFM)	(HMM)
Sunday, 21/3/2021	8.00 - 1700	Travel from KLIA to Sandakan	√	√	√
Monday, 22/3/2021	0830-0930	<p>Sakilan estate:</p> <p>Opening Meeting:</p> <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 	√	√	√
	0930-1230	<p>Sakilan estate</p> <p>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.</p>	√	√	√

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Date	Time	Subjects	(MNM)	(MFM)	(HMM)
	1230–1330	Lunch	√	√	√
	1330 - 1500	Continue audit in Sakilan estate	√	√	√
	1500-1515	Travelling to Sakilan POM			
	1515 - 1730	Sakilan 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. Interim Closing Briefing	√	√	√
Tuesday 23/3/2021	0800–1230	Sakilan POM Continue audit in Sakilan POM	√	√	√
	1000-1230	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	1230–1400	Lunch and Travelling to Linbar 1	√	√	√
	1400 - 1700	Linbar 1 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.	√	√	√
	1700 - 1730	Interim Closing Briefing	√	√	√
Wednesday 24/3/2021	0800 - 1000	Continue audit in Linbar 1 estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	√	√	√
	1000 - 1230	Travelling to Linbar 2 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.	√	√	√
	1230 - 1330	Lunch	√	√	√

Date	Time	Subjects	(MNM)	(MFM)	(HMM)
	1330 - 1630	Continue Audit in Linbar 2 estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records	√	√	√
	1630-1700	Closing Meeting Preparation	√	√	√
	1700-1730	Closing Meeting	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- IOI Sakilan POM and supply base 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

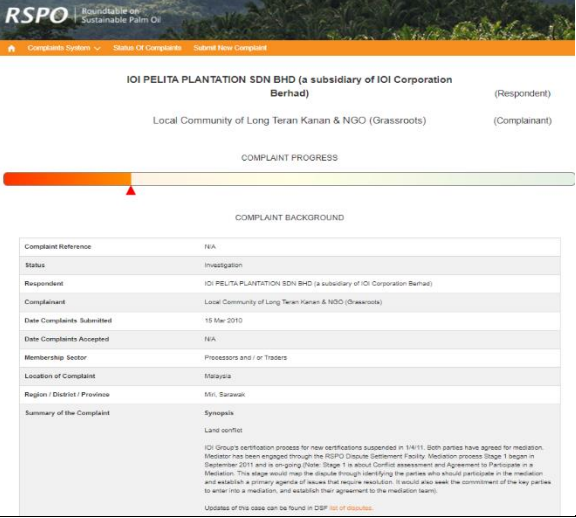
3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
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Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. Please refer to IOI Time Bound Plan updated as of 31 December 2020	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	The certification was still in progress and target was on year 2023 as per time bound plan. Please refer to IOI Time Bound Plan updated as of 31 December 2020 and IOI ACOP 2019 under Time Bound Plan which was submitted to RSPO.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Please refer to IOI Time Bound Plan updated as of 31 December 2020. This time bound plan was consistent with ACOP 2019. Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI. Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. The postponement of the main assessment into 2021 have been communicated to RSPO Head of Certification by email dated 2/9/2020. In November 2020, PT. SKS, PT. BNS and PT. BSS internal audit have been conducted.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses. Please refer to IOI Time Bound Plan updated as of 31 December 2020	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	Please refer to IOI Time Bound Plan updated as of 31 December 2020 and IOI ACOP 2019 which was submitted to RSPO.	Complied
Un-Certified Units or Holdings <i>(any non-compliance against the below shall be raised as Major Non-compliance)</i>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	No replacement. The concession in Indonesia PT. KPAM had undergo the NPP process prior to any new planting dated 13 April 2020. This can refer at https://rspo.org/certification/new-planting-procedure/public-consultations/page/3?	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No. The concession in Indonesia PT. KPAM had undergo the NPP process prior to any new	Complied

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	<p>planting. Please refer to the latest Time Bound Plan updated as of 31 December 2020.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p><i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</i> <i>Please refer to BSI-RSPO Secretariat approval.</i></p>	<p>Settlement on the dispute over land ownership in Tinjar Long Lapok is still in progress through the engagement programme headed by the IOI stakeholder team. Please refer to the latest Time Bound Plan updated as of 31 December 2020</p> 	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No labor dispute as per internal audit November 2020. Also there are some comment under ACOP 2019 as per below:</p> <p>2. One of the key obstacles that could affect the operation of the plantation, especially on social issues include lack of awareness on the usage of fire in agricultural practices, land rights and access to suitable capacity building. In order to address these issues we have developed a platform for the community to participate or access to the training program, including enhancing the communication between the plantation and the adjacent Communities.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>No non-compliance under legal being address during internal audit on November 2020. There also reporting under ACOP 2019.</p> <p>1. Changes in local legal requirements related to plantation management. The plantation region in Malaysia, has subscribed to legal system that enable their sustainable team to get access to the latest relevant laws and regulations to support the management of their plantation. Meanwhile, in Indonesia, IOI is consistently conduct the effort to track if there is any changes of law and regulation.</p>	<p>Complied</p>

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Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. The latest internal audit conducted was on November 2020 at P.T Sukses Karya Sawit, P.T Bumi Sawit Sejahtera and P.T Berkat Nabati Sejahtera. The team of sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes during audit been conducted accordingly. No negative comment been highlight by stakeholder. Refer 3.5 stakeholder comment.	Complied

3.3 Progress of scheme smallholders and/or outgrowers

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

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 Assessment there were One (1) Minor nonconformities and *no* Opportunity For Improvement raised. The *IOI Sakilan POM* Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2037587-202103-N1	Clause & Category (Critical / Minor)	Indicator 7.11.3 Minor
Date Issued	22/3/2021	Due Date	21/3/2022
Closed (Yes / No)	No	Date of nonconformity Closure	Next ASA
Statement of Nonconformity:	No evidence of the operating units' engagement on fire prevention and control measures with the adjacent stakeholders		

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Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.
Objective Evidence:	The estates visited engagement with the adjacent stakeholders during stakeholders' consultation meeting. Reviewed the latest stakeholders meeting was conducted as follows: 1. Sakilan Estate:17/08/2020 2. Linbar 1 Estate and Linbar 2 Estate: 18/09/2020 In the meeting, the estate brief the stakeholders on the IOI group policies, environmental and social issue. However, there is no evidence of the operating units' engagement on fire prevention and control measures with the adjacent stakeholders
Corrections:	The commitment from the new guidelines will be extracted and conversed to the adjacent stakeholders via other method of communication such as digital communication.
Root Cause Analysis:	The engagement on fire prevention and control measures with adjacent stakeholders is usually conducted once a year during the external stakeholder consultation and inclusive of inputs communication given following the Emergency Response Plan measure in which the new commitment as mentioned in the new guideline dated 8/1/2021 has yet being incorporated. Adding in, the guideline had just been newly distributed towards end February 2021 by IOI Sustainability HQ.
Corrective Actions:	Apart of having the communication digitally conversed, the commitment from the new guidelines will also be communicated during the annual stakeholder consultation and as when the needs arise. To appoint person in charge for fire prevention and control measure and ensure to update and engages with adjacent stakeholders on fire prevention and control measures if any update from the management.
Assessment Conclusion:	The status of Minor NC is remain open. The effectiveness of the minor NC closure will be verified in the next surveillance assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good document retrieval from the operating unit.
PF 2	Good commitment from estate management and IOI Sustainability team.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity

NCR Ref #	1853946-201911-M1	Clause & Category (Critical (Major) / Minor)	Indicator 4.1.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	19/02/2020
Statement of Nonconformity:	The Sustainable Palm Oil Policy is not adequately address the clause requirement.		
Requirement Reference:	A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
Objective Evidence:	The Sustainable Palm Oil Policy doesn't including prohibiting retaliation against Human Rights Defenders (HRD) and yet to be communicated to all levels of the workforce, operations, supply chain and local communities.		
Corrections:	The current Sustainable Palm Oil Policy will be revised to include the needs against requirement compliance. Communication to all level of workforce will be carried out once the revised policy is finalized. Timeline: Within the stipulated period of 90days (until 21st February 2020).		
Root Cause Analysis:	The Sustainable Palm Oil Policy does contain statement related to the Human Rights Defenders (HRD). It was stated in the policy that IOI respect and uphold the rights of all workers, including contract, temporary, and migrant workers, in accordance to United Nations Guiding Principles on Business and Human Rights (UNGPs). However, the operating units in Sakilan Group were not able to fully relate the relation between the statements in the UNGPs with the requirement.		
Corrective Actions:	A supplementary internal audit will be carried out at all Sakilan group operating unit to prevent recurrence of issue. Timeline: Within the stipulated period of 90days (until 21st February 2020).		
Assessment Conclusion:	Major NC verification visit on 19/02/2020: 1. Sighted the new IOI Sustainable Palm Oil Policy revised January 2020 by Group CEO, Dato' Lee Yeow Chor and Group Head of Sustainability, Dr. Surina Ismail. The policy under the Human Rights and Workplace has mentioned the respect and uphold the rights of all workers, including contract, temporary and migrant workers in accordance with the Universal Declaration of Human Rights, the International Labor Organization's core conventions, United Nations Guiding Principles on Business and Human Rights (New York and Geneva, 2011) and the principles of Free and Fair Labor in Palm Oil Production. Further reference made to the United Nations Guiding Principles on Business and Human Rights (New York and Geneva, 2011), under clause B Operational principles (State-Based Judicial Mechanisms), no 26, states should ensure that they do not erect barriers to prevent legitimate cases from being brought before the courts in situations where judicial recourse is an essential part f accessing remedy or alternative sources of effective remedy are unavailable. They should also ensure that the provision of justice is not prevented by corruption of the judicial process that courts are independent of economic or political pressures from other State agents and from business actors and that, the legitimate and peaceful activities of human rights defenders are not obstructed.		

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	<p>2. Verified the communication records for the new policy to internal and external stakeholders for IOI Sakilan Certification Units as below:</p> <ul style="list-style-type: none"> • Central Working Committee (CWC) meeting 01st 2020 Sakilan Group on 22/01/2020 attended by 19 management team representatives. • Course title: Human Rights Defender by Mr Ezman bin Mohd Yusop on 01/02/2020 (82 workers) and 06/02/2020 (37 workers) in Sakilan POM. • Training: Human Rights Defender by Mr Bryan Barrega on 04/02/2020 to 15 staff workers in Sakilan Estate. • Training: Human Rights Defender by Mr Bryan Barrega on 03/02/2020 to 16 staff workers in Linbar 2 Estate. • Muster briefing: 04/02/2020 to 169 workers at Linbar 2 Estate, 29/01/2020 to 74 workers (Division 1) Sakilan Estate and 01/02/2020 to 54 workers (Division 2) Sakilan Estate. • Human Rights Defender briefing to all staffs, executive and HOD by Mr Bryan Barrega on 11/02/2020 to 31 workers at Linbar 1 Estate. • Stakeholder meeting for Sakilan Group on 17/02/2020 (0900 am at Sakilan POM attended by 54 external stakeholders & 0330 pm at Linbar 1 Estate attended by 11 external stakeholders). • Internal audit report (Doc ref no: SPO/SDK/F/002, issue/rev: I-01/R-00, 01/02/2020) conducted by SPO department, Sandakan region (Bryan Barrega) dated: <ul style="list-style-type: none"> • 18/02/2020: Linbar 2 Estate. Closed of the NC raised by external audit. • 17/02/2020: Sakilan Estate/Linbar 1 Estate and Sakilan POM. <p>Interview session with the internal and external stakeholders on the briefing conducted regarding new policy by Sakilan Management confirmed the information and implementation of the new policy been communicated. The stakeholders interviewed were school management, (government school, HUMANA, CLC), workers representatives (Indonesian & Malaysian), neighbouring estates, contractors and suppliers during the Major NC closure visit on 19/02/2020. All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 19/02/2020.</p>
<p>Verification conclusion:</p>	<p>Sighted the new IOI Sustainable Palm Oil Policy revised January 2020 by Group CEO, Dato’ Lee Yeow Chor and Group Head of Sustainability, Dr. Surina Ismail. The policy under the Human Rights and Workplace has mentioned the respect and uphold the rights of all workers, including contract, temporary and migrant workers in accordance with the Universal Declaration of Human Rights, the International Labor Organization’s core conventions, United Nations Guiding Principles on Business and Human Rights (New York and Geneva, 2011) and the principles of Free and Fair Labor in Palm Oil Production. Further reference made to the United Nations Guiding Principles on Business and Human Rights (New York and Geneva, 2011), under clause B Operational principles (State-Based Judicial Mechanisms), no 26, states should ensure that they do not erect barriers to prevent legitimate cases from being brought before the courts in situations where judicial recourse is an essential part from accessing remedy or alternative sources of effective remedy are unavailable. They should also ensure that the provision of justice is not prevented by corruption of the judicial process that courts are independent of economic or political pressures from other State agents and from business actors and that, the legitimate and peaceful activities of human rights defenders are not obstructed. Thus Major NC remained close.</p>

Non-conformity			
NCR Ref #	1853946-201911-M2	Clause & Category (Critical (Major) / Minor)	RSPO SCCS 5.4 (E4.1) Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	19/02/2020
Statement of Nonconformity:	Sakilan POM didn't inform CB immediately when there is projected overproduction of certified tonnage.		
Requirement Reference:	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.		
Objective Evidence:	It was found out that Sakilan POM has overproduction of certified tonnage within the Palmtrace License period (Dec 2018 – Oct 2019) with physical FFB processed is 122,558.57 MT while FFB volume in Palmtrace and RSPO Certificate is 114,556 MT.		
Corrections:	To inform Certification Body about the overproduction volume of the FFB certified tonnage promptly. Timeline: Within the stipulated period of 30days (until 21st December 2019).		
Root Cause Analysis:	Sakilan POM focused only on CPO and PK production monitoring and did not notice the requirement of FFB production in the RSPO Palmtrace system.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Sakilan Group will conduct a meeting every three months to discuss on FFB performance hence monitor any possibility of FFB volume overproduction. 2. Sakilan POM management will appoint a person to constantly monitor the total of physical FFB received and processed. The person will be responsible to inform the mill and regional sustainability management for further action if there is a possibility of FFB volume overproduction against the FFB volume in RSPO Palmtrace system. Timeline: Within the stipulated period of 30days (until 21st December 2019).		
Assessment Conclusion:	Major NC verification visit on 19/02/2020: <ol style="list-style-type: none"> 1. Email communication from Sustainability Marketing (Nur Farahin) on 03/12/2019 for the volume extension request to BSI in Palmtrace system (FFB: 19,072.68 MT, CPO: 5,128.71 MT and PK: 651.55 MT). The approval of Palmtrace volume extension request for Sakilan POM on 04/12/2019 sighted. 2. Central Working Committee (CWC) meeting 01st 2020 Sakilan Group on 22/01/2020 attended by 19 management team representatives. The overprojected FFB volume from the external RSPO audit. Estate need to give full cooperation for giving the correct and accurate FFB data to mill. A plan to have 3-monthly meeting/year to discuss on the production and estate & mill performance will be initiate after this. 3. Letter from Acting Manager (Linbar 2 Estate) dated 20/12/2019 on the meeting CWC Sakilan Group every 3 months starting January 2020. 4. Letter of appointment for legal/secretarial/office to Mr Thong Yee Han (Assistant Mill Manager-Sakilan POM) on 13/12/2019. Interview session with the person in charge also verified the new role of monitoring the FFB, CPO and PK volume during the Major NC closure on 19/02/2020. 		

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	All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 19/02/2020.
Verification conclusion:	During the period of November 2019 to October 2020, Sakilan Palm Oil Mill has received and processed 116,137.06 mt of FFB from its own supply bases. No overproduction occur during assessment and record verification, thus Major NC remained close.

Non-conformity			
NCR Ref #	1853946-201911-N1	Clause & Category (Critical (Major) / Minor)	Indicator 4.2.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	17/11/2020
Statement of Nonconformity:	The grievance process is not implemented effectively.		
Requirement Reference:	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
Objective Evidence:	No evidence on date of action taken and completion sighted in the Green Book, Complaint and Grievances, Sample taken on complaints at Sakilan Estate dated 6/8/19 by Mrs. Samsiah Soga, AU 116500 on House No 6, Block K, Division 2 - kitchen door out of order.		
Corrections:	1. Date of action taken and completion evidence will be attached on the said samples. 2. To appoint a dedicated person to regularly monitor the status of action taken on each of the issue reported in the Complaint / Grievances Book. Timeline: The attachment of the said samples sighted during audit were presented to auditors on 21st November 2019. The similar document will be submitted together with the appointment letter of the dedicated person by end December 2019.		
Root Cause Analysis:	There is no dedicated person to follow up the status of action taken by the management.		
Corrective Actions:	1. Management will confirm with workers' representatives if there is any unresolved complaints during Joint Consultative Committee meeting. 2. Grievance procedure training will be conducted to Sakilan Estate management by the regional office. Timeline: 1. Meeting to be conducted every 2 months. 2. Grievance Procedure training to be conducted in 2nd half of FY19/20.		
Assessment Conclusion:	The status of Minor NC is remain open. The effectiveness of the minor NC closure will be verified in the next surveillance assessment.		
Verification conclusion:	As per verification, all the complaints/request were solved within timeframe which is less than 2 weeks. The management already appoint social representative to		

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	<p>ensure the complaint was followed as per SOP. This is verified in the Complaint/Grievance book sampled as below:</p> <ol style="list-style-type: none"> 1. Linbar 2 Estate: Request to prolong the electricity period for ceremony, requested by Ramli Dagung on 06/03/2020. Status is approved. 2. Sakilan POM: Damage lamp at living hall on 23/07/2020. Status is completed. 3. Sakilan Estate: Damage septic tank at Jalinah’s house on 13/02/2020. Status is completed on 15/02/2020. <p>Thus the minor NC was close accordingly.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	<p>1853946-201911-I1 Indicator 6.2.2 Details: Seen in the Contract Agreement of workers under clause no 19: "Kontrak ini tidak boleh dipindahkan kepada majikan lain tanpa persetujuan daripada pekerja dan kebenaran bertulis daripada Pengarah Tenaga Kerja Sabah". However, the Management need to re-look into the clause as any transfer of foreign workers might involve Immigration Department as the visa & permit are approved by their respective department.</p> <p>Verification: As per verification Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts as below: Linbar 1 Estate: <ol style="list-style-type: none"> a. Employee ID: 1SRP/IOI/1215/5027 b. Employee ID: 1SRP/IOI/0313/5042 c. Employee ID: 1SRP/IOI/1015/5231 d. Employee ID: 1SRP/IOI/0115/5025 Linbar 2 Estate: <ol style="list-style-type: none"> a. Employee ID: 1SRP/IOI/1212/5570 b. Employee ID: 1SRP/IOI/0319/5652 c. Employee ID: 1SRP/IOI/0116/6766 d. Employee ID: 1SRP/IOI/1017/5765 Sakilan POM: <ol style="list-style-type: none"> a. Employee ID: 1SHL/IOI/0114/6912 b. Employee ID: 1SHL/IOI/0510/6924 c. Employee ID: 1SHL/IOI/0417/6959 d. Employee ID: 1SHL/IOI/0417/6985 Thus, Observation was close accordingly.</p>

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1853946-201911-M1	Major	Indicator 4.1.1	22/11/2019	19/02/2020 (Close)
1853946-201911-M2	Major	RSPO SCCS 5.4 (E4.1)	22/11/2019	19/02/2020 (Close)

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1853946-201911-N1	Minor	Indicator 4.2.3	22/11/2019	17/11/2020 (Close)
2037587-202103-N1	Minor	Indicator 7.11.3	22/3/2021	Open

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 *IOI Sakilan POM* 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	
<p>Internal Stakeholders Representative from SK Sakilan Crèche Ayah Kg lungmanis Kg Pahu Humana</p>	<p>Union/Contractors Malsa Corporation Chuanye Hardware S/B</p>
<p>Government Departments Nil</p>	<p>NGO Nil</p>

Stakeholders comment	
1	<p>Feedbacks: Mill & Estates vendor: No issue in contractual works and supplied spare parts pricing and payment. Has long business relationship with company for more than 10 years.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
	<p>Feedbacks:</p>

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<p>2</p>	<p>Neighbouring estate (Malsa Corporation): Managers been invited to latest stakeholder meeting and attended accordingly. Management of IOI Sakilan Estate communicated and explained well on RSPO sustainability requirements. Have good relationship with company management and no issues related to land and planting boundaries between both companies.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
<p>3</p>	<p>Feedbacks: Local & foreign workers’ JCC representatives: Most of workers felt stressful for not being able to go out of estate and housing compound due to voluntary lockdown enforced by management since January 2021. However, it is agreed among them that it is safer and whatsoever, estates management been very helpful to assist on workers needs including daily sundries.</p> <p>Management Responses: It was understood that the stressful condition among workers due to unable to go out of estate. Management provide full support mainly in providing workers needs with complete daily needs in grocery shops during this pandemic period for their own benefits as well as companies. Workers are provided with alternative to order through staff in-charges to go to town for other matters during this voluntary lockdown period.</p> <p>Audit Team Findings: No further issue.</p>
<p>4</p>	<p>Feedbacks: Grocery store/canteen operator: Had issues during Movement Control Order (MCO) and Conditional Movement Control Order (CMCO) period to buy shop’s stock from wholesaler due to stringent enforcement by estate management that requires mandatory swab test every time out and come back in estate. Had discussion and allowed to conduct the swab test only if necessary, i.e. if have symptoms.</p> <p>Management Responses: Management must strictly follow company’s directive in order to prevent occurrence and spread of COVID-19 case.</p> <p>Audit Team Findings: No further issue.</p>
<p>5</p>	<p>Feedbacks: Village (Kampung Lungmanis & Kampung Pahu) representatives: No issue by mill and estate activities. Have good relationship with management of company and staff who are mostly among local villagers. Company very helpful when local villagers have problem such as during the recent flood season by assisting to repair roads and aid with flood victim.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
	<p>Feedbacks:</p>

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6	<p>Schools (SK Sakilan Desa & Humana School) representatives: Estate managements always visits and contributes to school programs and activities. 100% of children among estate foreign workers are schooling at Humana including from neighbour estate. School facilities were well maintained by company.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
<p>Assessor Note: Not applicable as IOI Sakilan acquired (freehold and leased) all the land directly from the state of Sabah government. All the estates in IOI Sakilan currently in second generation planting cycle.</p>					



Previous land owner / user comment	
	<p>Feedbacks: Sakilan Estate & Mill obtained the land from Gaya House Sdn Bhd on 11.07.1979. Linbar 1 & Linbar 2 Estate obtained the land from Sabah State government on 08.07.1983.</p>
	<p>Management Responses: No other issue.</p>
	<p>Audit Team Findings: Since this was long ago and the company is now a developer company, no one can answer on the question for the land transfer process. Also, there is no customary rights land in the IOI-Sakilan POM Certification Unit.</p>

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that IOI Sakilan POM and Supply base has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (<i>MYNI 2019</i>) 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 IOI Sakilan POM and Supply base is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<p>Name: Muhamad Naquiuddin Mazeli</p>	<p>Name: A. PRAKASH SR. PLANTATION CONTROLLER SANDAKAN REGION</p>
<p>Company Name: BSI Services (M) Sdn Bhd</p>	<p>Company Name: IOI PLANTATION SERVICES SDN BHD</p>
<p>Title: Lead Auditor</p>	<p>Title: SENIOR PLANTATION CONTROLLER</p>
<p>Signature:</p> 	<p>Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<p>Date: 6/5/2021</p>	<p>Date: 17.05.2021</p>

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1			
The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Publicly available management documents such as land titles, OHS plans, EIA, SIA, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available and can be cross referred to their respective criterion.</p> <p>All operating units have individual documents and records to demonstrate compliance to this indicator. IOI Group documents are also accessible through their Group’s website link: http://www.ioigroup.com</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information provided in English and Bahasa Melayu accessible to all stakeholders in IOI complex with translation on the information provided by the management to requested party mainly among foreign workers . More information publicly available can be access through web https://www.ioigroup.com/Content/S/S_Define, this include Sustainable Palm Oil Policy, Sustainable implementation update and others.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Sakilan Estate has keep both external and internal stakeholder request in the Letter To/From Stakeholder File and Complaint/grievance book. Among the request sighted and record available for review. Sampling as per below:-</p>	Complied

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		A request record from Sekolah Kebangsaan Sakilan Desa (Letter ref: SKSD/100-07/03 dated 3 Jan 2020. Sakilan estate donate RM 128.00 to the School to fixed the Water Pump.	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Corporation Berhad has developed Stakeholder Request Procedure for Corporate Level and Estate Level and Grievance Procedure (Staff Grievances Standard of Procedure).</p> <p>The flowchart has detailed out the process of request by the stakeholders. Stakeholders can access to www.ioigroup.com, call IOI Group General Line or write formal letter to Head Office of IOI if they have any requests or complaints. The stakeholders need to be informed of outcome within 5 working days.</p> <p>Implementation made through the external stakeholder consultation conducted by the estates of this Certification Unit on 18/09/2020 at Sakilan POM Mini Hall. It was attended by 55 stakeholders including contractors, school teachers, canteen owners, suppliers, etc.</p> <p>The internal stakeholder meeting involves worker’s representatives, contractors, HUMANA School teacher, etc were conducted by respective estates as below:</p> <ol style="list-style-type: none"> 1. Sakilan Estate: 26/10/2020. 2. Linbar 1 Estate: 28/10/2020. 3. Linbar 2 Estate: 14/10/2020. 4. Sakilan POM: 05/10/2020 	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The stakeholder list was updated on 23/9/2020 at Sakilan Estate, 30/10/2020 at Linbar 1 Estate, 22/9/2020 at Linbar 2 Estate and 1/10/2020 at Sakilan POM including government bodies, NGO,</p>	Complied

		suppliers, contractors, community, neighbouring estates, etc. with their own representatives.	
Criterion 1.2 The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	The Business Ethics, Compliance, Anti-Corruption and Anti-Money Laundering Policy was available dated September 2018. The management of Sakilan already communicate the policy in all business operation including during stakeholder meeting and induction. IOI Group’s employees and directors are not allowed to accept or give courtesies, which involve cash or cash equivalents, or which could be evaluated as illegal or improper exchanges. In addition, government or public servants may be under strict guidelines, preventing them from receiving courtesies. Offering courtesies to government or public officials may be considered as a legal offence in certain countries. The briefing of Policy was conducted at respective unit as below: <ol style="list-style-type: none"> 1. Linbar 1 Estate: 29/09/2020. 2. Linbar 2 Estate: 05/02/2020. 3. Sakilan Estate: 03/11/2020. 4. Sakilan POM: 01/10/2020. 	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Mechanism for ensuring compliance is described in the “Mechanism of Tracking Law Changes”, dated 27/7/2018. The sustainability team is responsible to monitor implementation/updating of information through routine monitoring and internal audit. Internal Audit for Sakilan Estate dated 09/09/2020, Linbar 1 Estate dated 08/09/2020 and Linbar 2 Estate dated 07/09/2020 by Sustainable Palm Oil Department. Also, for ensure the compliance	Complied

		<p>of Business conduct & ethics by Sandakan Town Office, Procedure of controlling the disclosure of confidential information (for third party) estate dated 2011 has been established to ensure the compliance and the implementation of the policy and overall ethical business practice.</p>	
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>If smallholder is applicable, records that the smallholders are aware on the legal requirements they need to comply. Sakilan Certification Unit continued its commitment in compliance with legal requirements. The followings are among the examples of compliance verified: IOI Plantation Services Sdn Bhd: Sabah Department of Manpower (Ministry of Human Resources) Permit Deduction From Employees 'Salaries Section 113 (4), Labor ordinance (Sabah Chapter 67) for travel document processing fees (excluding levies, bank guarantees, workers' compensation insurance and health examination (GROWARISAN)) , deduction of sports and recreation club fees, electricity bill, telephone, store/grocery items, refund of purchase of buffalo, surau/church fee, SKHPPA, SRC, Medical (employee's dependents) and vehicle (4% interest) available for review. In Linbar 2 estate: Permit for KPDNKK for diesel and petrol available (S014337) dated valid 16/5/2020 until 15/5/2021 License for hired Indonesia workers (JTK H.KBN.600-4/1/1/01261/0282 valid until 26/7/2021</p>	<p>Complied</p>

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		<p>MPOB license 5024510200 valid until 31/8/2021 PMT license SB PMT 1624 valid until 12/10/2021. For Sakilan POM: SB PMT 80633 (Air compressor) valid until 1/6/2021 PMD 10485 (Dandang Steam Water Tube) valid until 1/6/2021 DOE license for black smoke (Exemption) valid from 29/8/2020 until 29/6/2021 Weighbridge calibration for 60,000kg (B1504937) valid until 13/5/2021 for 80,000kg(B1625012) valid until 24/4/2021. JTK license for Women working at night (600-1/2/8/320(08)/SDK/2018-023) valid until 19/2/2021.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -</p>	<p>The documented system for ensuring legal compliance was available dated 1/11/2020 and been update by Mr Berthold. He been appointed by management, as per appointment letter dated 26/10/2020 available at site for review.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -</p>	<p>The legal and boundaries was clearly demarcated and visibly maintained by management using boundaries peg, drainage and boundary stone available as per verification at site as per below:-</p> <ul style="list-style-type: none"> • In Linbar 2 estate at field P16B with Segaluid Lokan Forest Reserve • For Linbar 1 estate in Field P10H with Lokan forest reserve • Sakilan estate field P97W with IJM Plantation 	Complied
Criterion 2.2:			
All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements			
2.2.1	<p>A list of contracted parties is maintained. - Minor compliance -</p>	<p>List of all contracted parties were maintained in the operating units' stakeholder list. The latest list was updated on 16/11/2020. Among the stakeholders registered were government agencies,</p>	Complied

		neighbouring estates, neighbouring villages, NGO, contractors, suppliers and service providers.	
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>There are only transportation contract available, sampling on KK Fong Sdn Bhd and IOI Halusah Ladang Sdn Bhd dated August 2019. The requirements to comply with applicable laws are stipulated in the contract agreements. Among the applicable laws mentioned are:</p> <ul style="list-style-type: none"> • Sabah Labour Ordinance • Passport Act • Anti-trafficking in Persons and Anti-Smuggling of Migrant Act • Immigration Act • SOCSO Act • Workmen Compensation Act • EPF • Minimum Wage Order • OSHA • EQA • Road Transportation Act 	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The contract agreements for all the contractors contain clauses to disallow child, forced and trafficked labour which were written under subtitles "Sustainability Palm Oil Policy (SPOP)", "Sabah Labour Ordinance" and "Human Rights". These three subtitles made reference to IOI's SPOP and SLO.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			

2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license <p>- Critical (Major) compliance -</p>	NA as there the mill does not purchase any FFB sourced from other company nor smallholders.	Not Applicable			
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	NA as there the mill does not purchase any FFB sourced from other company nor smallholders.	Not Applicable			
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>						
<p>Criterion 3.1</p>						
<p>There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>						
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	Annual budget and management plan were documented with five years projection includes FFB production, CPO, OER, and KER, costs of production, CAPEX and OPEX. There is no scheme smallholder within the supply base. The business plan was available for Sakilan estate, this business plan cover crop by year, replanting programmed, executive/staff and workers requirement costing for maintain palm oil and depreciation. Sampling on business plan dated 4 Sept 2020.	Complied			
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The replanting programme was available in Linbar 2 estate Business plan 19/20. The replanting programme cover for 10 years. Total will be replant was from year 2020 until 2025 as per detail below:-</p> <table border="1" data-bbox="1137 1331 1921 1377"> <tr> <td>Estate</td> <td>year</td> <td>hectarage</td> </tr> </table>	Estate	year	hectarage	Complied
Estate	year	hectarage				

		<table border="1"> <tr> <td rowspan="2">Linbar 2 estate</td> <td>2020/21</td> <td>346</td> </tr> <tr> <td>2021/22</td> <td>157</td> </tr> <tr> <td rowspan="4">Sakilan estate</td> <td>2020/21</td> <td>230</td> </tr> <tr> <td>2021/22</td> <td>232</td> </tr> <tr> <td>2022/23</td> <td>232</td> </tr> <tr> <td>2023/24</td> <td>241</td> </tr> </table> <p>For Linbar 1 estate no replanting for the next 10 years.</p>	Linbar 2 estate	2020/21	346	2021/22	157	Sakilan estate	2020/21	230	2021/22	232	2022/23	232	2023/24	241	
Linbar 2 estate	2020/21	346															
	2021/22	157															
Sakilan estate	2020/21	230															
	2021/22	232															
	2022/23	232															
	2023/24	241															
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>The management review has been conducted annually and the latest was done on 22 August 2020. This management review included result of internal audit, customer feedback, performance process, status of preventive, corrective action plans and others.</p>	Complied														
<p>Criterion 3.2 The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>																	
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The continuous improvement plans for all operating units for financial year 2020/21 were available. Among the aspects covered in the plans were Social, Environment, Safety and Technology. In general, among the plans established were improving the infrastructure of various building facilities, continuous educational programmes on wastes and pollution management, improving various occupational safety aspects such as control measures and venturing any possible new technology that worthy invested.</p>	Complied														
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p>	<p>Notwithstanding the unavailability of the RSPO metrics template, IOI maintains submitting its ACOP and RSPO GHG Calculations to the RSPO Secretariat.</p>	Complied														

	<p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
<p>Criterion 3.3 Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) in the form of written document for estates and mills are documented and maintained. It covers procedures as required by the RSPO P&C MYNI:2019.</p> <p>The company's management process and operations are guided by the following documents:</p> <ol style="list-style-type: none"> 1. Group Standard Operating Procedures (StOP) for Palm Oil Mill Operations, 01/07/2017 2. Group Safe Operating Procedures (SaOP) 3. Group Occupational Safety and Health Guidance for Estate Workers (in Bahasa Malaysia) 4. Group Standard Operating Procedure (StOPs) for estate dated 18 Feb 2017 5. Group Social Impact Assessment and Management Action Plans (Guidance Document) dated 10 Oct 2011 6. Group Environmental Impact Assessment and Management Action Plans dated December 2007. 	<p>Complied</p>

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		<p>7. Internal Audit procedure dated 3 May 2018</p> <p>8. The SOP for the unit of certification is in place and available. Refer to REF: IOIPD-SOP-LC dated December 2018, sampling on new sop such as Standard Operating Procedure (SOP) for Land Clearing and Ganoderma Control.</p> <p>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:</p> <ul style="list-style-type: none"> • Consultation and communication • Negotiation on compensation. • Guidance and procedure for gifts and hospitality. • Selection and contracting of contractors including recruitment agencies • Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination. • Procedures for Supply Chain. • Internal Audit procedure for Supply Chain • Remediation and Compensation Procedure (RaCP) • Accident and emergency procedures • Proper disposal of waste material 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The mechanism to check the consistent implementation of procedure was available such as Senior Mill Controller Visit and Internal Audit. The latest SNC visit was on 7/2/2021 by Mr N.Raymond. The other implementation to ensure consistent was on Internal Audit been conducted by Sustainable Palm Oil Department and latest record was on dated 10/9/2020.</p>	Complied

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3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The monitoring on implementation of internal audit finding was done periodically. Sampling on Plantation controller have been visit on 15/10/2020. The operation was recorded accordingly and available for reviewed in each estate.	Complied
Criterion 3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	No new planting in IOI Sakilan POM certification unit. Annual Review for Social Impact Assessment (SIA) (Linbar 1 Estate: 11/11/2020, Linbar 2 Estate: 19/10/2020, Sakilan Estate & Sakilan POM: October 2020) were developed with the participation of various stakeholders, examples are worker’s representatives, villagers, school teachers, contractors, etc. Latest Environmental Impact Assessment for all operating units visited was conducted in 2020 and reviewed on annually basis documented in Environment Impact Assessment Management Action Plans & Continuous Improvement Plan. No changes as per previous year record.	Complied
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. - Minor Compliance -	The external stakeholder consultation was conducted by the estates of this Certification Unit was held on 18/09/2020 at Sakilan POM Mini Hall. It was attended by 55 stakeholders including contractors, school teachers, canteen owners, suppliers, etc. The internal stakeholder meeting involves worker’s representatives, contractors, HUMANA School teacher, etc were conducted by respective estates as below: 1. Sakilan Estate: 26/10/2020. 2. Linbar 1 Estate: 28/10/2020. 3. Linbar 2 Estate: 14/10/2020.	Complied

		<p>4. Sakilan POM: 05/10/2020</p> <p>The mill and estates visited has established environmental management plan base on the impact assessment conducted. The plan was documented in several management plan such as:</p> <p>Estates</p> <ol style="list-style-type: none"> 1. Identification and Management Plan of Waste Products 2. Identification and Management Plan of Potential Pollutant Source 3. Identification of fertiliser alternative 4. Identification of Potential Source of GHG Emission and GHG Reduction Plan 5. Identification of Integrated Pest Management 6. Impacts from replanting and it's Management Plan 7. Water Management 8. Environmental Hazard and its Management Plan <p>Mill</p> <ol style="list-style-type: none"> 1. Identification and Management Plan of Waste Products, Potential Pollutant Source and Potential Source of GHG Emission 2. Identification of Side-Products/Waste 3. Identification of Potential Source of GHG Emission and GHG Reduction Plan 4. Water Management Plan 5. Road maintenance and construction 6. Identification and management plan of conservation area 7. Environmental Hazard and its Management Plan 	
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<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>SIA plan established has summarize the issues raised, potential impacts to social, action plans and monitoring programme as week as management review and comments.</p> <p>Reviewed the implementation of the environmental management plan as follows:</p> <ol style="list-style-type: none"> 1. Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. 2. Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from river. The mill has recorded 2.28 m³/mt FFB in the last financial year (Jul 2019-Jun 2020). 3. Linbar 1 Estate disposed scrap iron through appointed contractor by HQ. Latest disposal was conducted on 19/08/2020 as per payment voucher no. 0103 and 0104 4. Latest recycle waste disposal in Linbar 1 estate was conducted on 10/09/2020 as per official receipt no 21611 dated 21611. 5. Latest drinking water analysis for Linbar 2 Estate was conducted on 30/12/2020 as per certificate of analysis no. W2012230-03A-0 and W201230-03B-0 dated 21/01/2021. The results of water analysis after treatment was found conform to National Standard for Drinking Water Quality 	<p>Complied</p>
<p>Criterion 3.5 A system for managing human resources is in place.</p>			

3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>SOP for Workers on HR Matter (Ref No: IOI/SRO/HRD/20-156) includes the employment Procedure for Workers, Retirement, Termination, Absconded Foreign Workers, Resignation & Repatriation Process Flow for Foreign Workers established as guideline.</p> <p>Additionally, in Sabah, there is SOP for Legalization Programme (HRD/REC-REG/01/2019) for workers, Foreign Workers Recruitment Guideline & Procedures in Malaysia dated July 2018, Procedure of New Workers Recruitment with Valid Pass (Ref no: HRD/REC-VP/01/2019) and Procedure of New Workers Recruitment (Ref no: HRD/REC-NW/01/2019) for IOI Plantation Division Sabah</p> <p>Employment contracts also stated the termination clause where the period of resignation notice is agreed by both parties: 4 weeks for service less than 2 years, 6 weeks for services more than 2 years but less than 5 years and 8 weeks for service more than 5 years or more or between agreement of both parties.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on the employment contract, passport and pay slips reviewed in 6.5.2, the procedure of recruitment was implemented and records are maintained.</p>	Complied
<p>Criterion 3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>An Occupational Safety, Health and Hygiene Policy was established and signed by the Plantation Director. It is available in Bahasa Malaysia and English language. The policy has been communicated to all employees through briefings and hardcopy of policies were seen displayed at the estates notice boards.</p>	Complied

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		<p>OSH plan dated 5 Jan 2020 is available prepared by HSE manager. The plan was include the training needs, OSH meeting, Workplace inspection, medical surveillance and others.</p> <p>In Mill, chemical register was updated on 30 Oct 2019. This updated register cover chemical water, maintenance, boiler, lab, store, workshop and others.</p> <p>Sampling on CHRA implementation; report was establish on 27 March 2020 ref no. HQ/11/ASS/00/298-2020/182 by DAB OH Sdn Bhd. The management already send their workers to medical surveillance on 2/9/2020 at DAB OH Sdn Bhd examine by Dr Donny Cristante (HQ/19/DOC/00/00399). The result showed all fit to work with chemical and workshop.</p> <p>For Noise risk assessment, report ref DABOH/0920/051, conducted on 5/9/2020 by Dr Mohd Azizan (HQ/18/PEB/00/00024). The area cover in all activity in estate including tractor, boiler, steriliser and others. Audiometric test conducted on 24/8/2020 by DAB OH Sdn Bhd, 36 workers involve in this test. From the result all fit and no with abnormal result and STS result.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Major Compliance -</p>	<p>The H&S plan dated 5/1/2021 is available, as per effectiveness H&S plan implementation verified as per verification on HIRARC review on 28/9/2020 for accident happen in Sakilan POM. An emergency meeting was held on 9/9/2020 to investigate and discuss the root cause and corrective action plan for accident at Press station From reported in JKKP 8 JKKP8/67553/2020 on 8/9/2020. The 3rd OSH meeting in Sakilan POM dated 28/9/2020 has highlighted this accident and suggest replacement of iron hammer into rubber hammer. The training was conducted to retrain the workers on 31/10/2020.</p> <p>The H&S plan for Linbar 1 estate, the plan to conduct Noise Risk Assessment was conducted on 25/9/2020 by Dr Mohd Azizan Bin</p>	Complied

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		Abdul Aziz (HQ/18/PEB/00/00024) from DAB OH Sdn Bhd (Report Ref: DABOH/1020/056). From the recommendation the management has conducted the Baselines audiometric test at Linbar 1 estate on 7/1/2021 with total 25 workers including tractor driver and Genset staff.													
Criterion 3.7 All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.															
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -	The management establish IOI Group Sustainability Palm oil policy dated Oct 2020 to ensure full commitment towards the wellbeing, safety and health for their company. The commitment cover the scope of storage, handling, transportation, usage and disposal of agrochemical. The training need and plan was establish dated December 2020 to ensure the training cover as per policy. It cover Social, environment, Best Practice and safety aspect such as training on Policy, Induction training, scheduled waste training, IPM training and others. The training was conducted – refer to indicator 3.7.2.	Complied												
3.7.2	Records of training are maintained. - Minor Compliance -	The training program specified the target group of employees to be trained for the identified subjects. In addition to the Good Mill /Agricultural Practice training, Process stations / field SOP related to trade/job skills, the following topics were included in the 2019/20 annual training program: <table border="1" data-bbox="1151 1141 1928 1385" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Operating Unit</th> <th style="width: 20%;">Date</th> <th style="width: 50%;">Training</th> </tr> </thead> <tbody> <tr> <td rowspan="4" style="text-align: center;">Sakilan Mill</td> <td style="text-align: center;">10/11/2020</td> <td>Working at High Training</td> </tr> <tr> <td style="text-align: center;">10/11/2020</td> <td>Confined space training</td> </tr> <tr> <td style="text-align: center;">11/11/2020</td> <td>Laboratory training</td> </tr> <tr> <td style="text-align: center;">11/11/2020</td> <td>Boiler training</td> </tr> </tbody> </table>	Operating Unit	Date	Training	Sakilan Mill	10/11/2020	Working at High Training	10/11/2020	Confined space training	11/11/2020	Laboratory training	11/11/2020	Boiler training	Complied
Operating Unit	Date	Training													
Sakilan Mill	10/11/2020	Working at High Training													
	10/11/2020	Confined space training													
	11/11/2020	Laboratory training													
	11/11/2020	Boiler training													

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			01/11/2020	Engine room SOP training	
		Linbar 2	18/8/2020	First aid training	
			7/5/2020	Spraying safety training	
			25/8/2020	Store safety work training	
			13/4/2020	Creach SOP training	
			28/1/2020	Bufferzone and HCV training	
			5/2/2020	Policy training	
			28/4/2020	Scheduled waste training	
		Linbar 1	29/1/2020	First aid and CPR training	
			23/1/2020	Water treatment training	
			22/1/2020	Manuring Training	
			11/3/2020	Bufferzone and HCV training	
			29/9/2020	Sexual Harassment awareness training	
			15/9/2020	SDS Training	
			21/10/2020	Fire drill training	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The appropriate SCCS training was provided to critical control point to ensure the personnel carrying the task effectively. The latest training conducted on 9/11/2020 for office staff and 10/11/2020 for security. Awareness training was provided to transporters of CPO and PK to refinery or mill. The awareness was given on 12/1/2021 for PK Transporter (Syarikat Budi Bersaudara) and 17/3/2021 for CPO Transporter (Rico Enterprise Sdn Bhd).</p>	Complied		

Criterion 3.8			
Supply chain requirement for mills (note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>The mill only received certified FFB from its certified estates which belong to IOI Corporation Berhad. A procedure, RSPO Supply Chain – Identity Preserve (IP) [doc. No.: RSPOSC/SOP/IP/3, rev. 8, dated 31/10/2020] was developed to implement the IP supply chain system at the POM. The procedure is applicable for incoming FFB, outgoing CPO & PK at RSPO certified mills that operate IP supply chain system. The procedure has also covered the subjects of overproduction, handling of complaints and non-conformities product.</p> <p>During the period of November 2019 to October 2020, Sakilan Palm Oil Mill has received and processed 116,137.06 mt of FFB from its own supply bases.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p>	NA	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.</p>	Complied

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3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Based on the announcement summary in RSPO PalmTrace, there were 22,407.91 mt of CPO sold within the period of Nov 2019-Dec 2020.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> a. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c. Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>IOI Plantation Services Sdn Bhd has developed procedures to implement the elements of the applicable supply chain model as below:</p> <ul style="list-style-type: none"> • RSPO Supply Chain – Identity Preserve (IP) [doc. No.: RSPOSC/SOP/IP/3, rev. 8, dated 31/10/2020] • Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018. <p>The Mill Manager has an overall responsibility and authority over the implementation of the procedure, requirements and compliances with all the applicable RSPO Supply Chain Certification Standard and assisted by Assistant Managers, Engineers and Technical Executives as per stated in its procedure.</p> <p>FFB were obtained from all IOI's certified estates only. There was no third party's crop nor non-certified FFB received by the mill.</p>	Complied
3.8.6	<p>Internal Audit</p> <ol style="list-style-type: none"> i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ol style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. 	<p>IOI Plantation Services Sdn Bhd has developed Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018 for conducting RSPO SCCS and RSPO Rules on Market Communications and Claims internal audit.</p> <p>The last internal audit was carried out on 9/12/2020 by the SPO Department Sandakan Region. The coverage of internal audit has included the General Chain of Custody Requirements for the Supply Chain and Module D: Identity Preserved. There was no non-conformity raised as a result of the internal audit.</p>	Complied

	<p>ii. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>		
3.8.7	<p>Purchasing and Goods In</p> <p>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p> <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement. The mechanism for handling non-conforming oil palm products and/or documents is addressed under RSPOSC/SOP/IP/3 Clause 12 which describes the non-certified material or product shall be kept segregated from the certified ones.</p>	Complied
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; 	<p>Based on samples of CPO & PK sales contracts/PO/sales confirmation and their samples of accompanying shipping documents corresponding to the contracts, all the required information in the standard was available. E.g. of shipping documents verified:</p> <ul style="list-style-type: none"> - Sales contract/purchase order - Commercial invoice - Delivery notes/Weighbridge tickets - Certificate of analysis - Goods receipt confirmation from buyer/buyer’s weighbridge tickets 	Complied

	<ul style="list-style-type: none"> e. RSPO certificate number; f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g. The quantity of the products delivered; h. Any related transport documentation; i. A unique identification number. 		
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i. The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii. The mill shall ensure the following: <ul style="list-style-type: none"> a. The mill has legal ownership of all input material to be included in outsourced processes b. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced 	<p>The mill have updated procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPOSC/SOP/IP/3 Rev: 08 dated 31/10/2020.</p> <p>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;-</p> <p>CPO Transporter</p> <ul style="list-style-type: none"> a) Rico enterprise b) KK Fong Sdn Bhd c) Syarikat Perniagaan Piqrusyahlia jaya <p>PK Transporter</p> <p>Syarikat Pengangkutan Budi Bersaudara</p> <p>Sampling on KK Fong Sdn Bhd and IOI Halusah Ladang Sdn Bhd dated August 2019. This agreement valid until 31/7/2022. It cover all requirement as per criteria 3.8.9</p>	<p>Complied</p>

	in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The POM have a record of all contact detail for transporter and updated. The record was stated under stakeholder list dated Jan 2020.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No changes and same as per previous year report.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv. For Mass Balance Module, the mill: <ul style="list-style-type: none"> a. Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can 	<p>Sakilan POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>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.</p> <p>The material and products movement on real-time basis is 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”. Among the information available in the format is date, FFB processed, OER, CPO amount [opening, produced and closing] and transferred CPO [mill weight, refinery weight].</p>	Complied

	be sold before it is in stock.		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	As per Mill monthly production records, the record was updated and available for reviewed	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	The mill have updated procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPO SC/SOP/IP/3 Rev: 08 dated 31/10/2020. From the record verification no outsider FFB accepted in Sakilan POM. The FFB source only from supply base as per RSPO Sakilan certificate.	Complied
3.8.16	<p>Registration of Transactions</p> <p>i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	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. For the period of Nov 2019 to Oct 2020, there were 29 announcements made.	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	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	Complied

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		Trademark License from RSPO. The trademark license# is 2-0002-04-100-03 which is valid from 19/12/2019 to 18/12/2021.	
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	IOI has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: https://www.ioigroup.com/Content/BUSINESS/B_Product	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	IOI has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: https://www.ioigroup.com/Content/BUSINESS/B_Product	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	IOI Plantation does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	IOI Plantation ensure communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No RSPO corporate logo used as evidence during the document audit and site visit.	Complied

Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and sales contract to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	The requirements of the RSPO SCCS are adhered to and was verified from the sampled weighbridge tickets of the sales of CPO.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Not applicable as Sakilan POM is neither distributors nor wholesalers.	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	IOI Sakilan does not have any product specific claim.	Complied

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6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable to Sakilan POM as they do not conduct business to consumer claims.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable to Sakilan POM as they do not conduct business to consumer claims.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable to Sakilan POM as they do not conduct business to consumer claims.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not applicable to Sakilan POM as they do not conduct business to consumer claims.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable to Sakilan POM as they do not conduct business to consumer claims.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable to Sakilan POM as they do not conduct business to consumer claims.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to	There was no use of RSPO Trademark logo used on product claim.	Complied

	RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Not Applicable for Sakilan POM.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	As at to date, no RSPO trademark used by the facility.	Complied
Messaging (IP)			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>As at to date, no RSPO trademark used by the facility.</p>	<p>Complied</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1</p>			
<p>The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Group has developed Sustainable Palm Oil Policy dated October 2020 where the company respects and uphold the rights of all workers, including contract, temporary and migrant workers in accordance with the Universal Declaration of Human Rights, International Labour Organization’s core conventions, United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labour in Palm Oil Production.</p> <p>The policy was displayed at notice board in office and linesite. Briefing of the policy was conducted on 03/11/2020 (Sakilan Estate), 09/10/2020 (Linbar 1 Estate) and 20/10/2020 (Linbar 2</p>	<p>Complied</p>

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		Estate) and 01/10/2020 (Sakilan POM) for all the workers through morning briefing and website: https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	As per Sustainable Palm Oil Policy dated March 2018, the company will eliminate all forms of illegal, forced, bonded, compulsory or child labour and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries. No changes from previous year.	Complied
Criterion 4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	IOI Corporation Berhad has developed and implemented Whistleblowing Policy, revised on October 2019 where the objective of the policy is to provide an avenue for all employees of IOI Group and all other stakeholders to raise concerns about any improper conduct within IOI Group. The policy is designed to provide transparent and confidential process for dealing with concerns. The policy has ensured protection to whistle-blowers where the person may choose to remain anonymous when reporting. The whistleblowing investigation shall be completed within 2 weeks from date of receiving the whistleblowing. Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties since last audit. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.	Complied

4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Procedures available and communicated during the Annual Review Social Impact Assessment with external and internal stakeholders as below:</p> <ol style="list-style-type: none"> 1. Stakeholder Request Procedure 2. Grievance Procedure 3. Sexual Harassment Grievance Procedure 4. Grievance Procedure for Land Owner <p>Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties since last audit. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed that they understood the procedures.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the complaints/request were solved within timeframe which is less than 2 weeks. This is verified in the Complaint/Grievance book sampled as below:</p> <ol style="list-style-type: none"> 1. Linbar 2 Estate: Request to prolong the electricity period for ceremony, requested by Ramli Dagung on 06/03/2020. Status is approved. 2. Sakilan POM: Damage lamp at living hall on 23/07/2020. Status is completed. 3. Sakilan Estate: Damage septic tank at Jalinah's house on 13/02/2020. Status is completed on 15/02/2020. 	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>IOI Group has given public access for grievance mechanism in website: www.ioigroup.com where the Grievance Procedure dated 20 Jan 2020 has mention: Process flow Page 2 and General terms & definitions page 5: Third party: if required during the process, IOI and the complainant can agree to involve a neutral third-party facilitator, mediator or specific social, environmental expert,</p>	Complied

		particularly where issues are complex or multiple groups are involved.	
Criterion 4.3			
The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	As a group level, IOI has the corporate social responsibility program and stated in website: https://www.ioigroup.com/Content/CI/Corp_Responsibilities as below: Dec 2020 Yayasan Tan Sri Lee Shin Cheng continued to support Dual Blessing Bhd by donating RM30,000 and 10 computers worth RM20,000 to its IT hub, which provides training and skills to the disabled community. Oct 2020 IOI Edible Oils Sdn Bhd supplied 10 pairs of goggles, spray equipment, and 15 units of steel beds to help frontliners during the COVID-19 pandemic. Sept 2020 IOI Plantation Services Sdn Bhd, assisted by the Malaysian Palm Oil Board's Beluran Branch, reached out to Kamansi Village and held a three-hour interactive programme with villagers under the Sustainable Palm Oil Cluster (SPOC) to address sustainability and traceability-related issues and concerns. The programme was successful as these villagers will obtain their Malaysian Sustainable Palm Oil certification under the SPOC Scheme soon.	Complied
Criterion 4.4			
Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			

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<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Land is not encumbered. It is lease from State Government of Sabah</p> <p>Sakilan Estate</p> <p>There are 3 land titles that form the estate hectarage of 2296.37 ha</p> <table border="1" data-bbox="1137 523 1926 1393"> <thead> <tr> <th data-bbox="1137 523 1525 639">Grant no./ History of ownership</th> <th data-bbox="1532 523 1711 639">Date of Title / lease period</th> <th data-bbox="1718 523 1926 639">Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 644 1525 882">CL 075471260, area =999.6 ha direct transfer from govt to Sakilan Desa Sdn Bhd</td> <td data-bbox="1532 644 1711 882">12.11.1997. 1000 year lease from 5.7.1888 to 04.7.2887</td> <td data-bbox="1718 644 1926 882">Signed between Govt of State of Sabah and Sakilan Desa Sdn Bhd on 18.12.1997</td> </tr> <tr> <td data-bbox="1137 887 1525 1125">CL 075471288, area =1.974 ha direct transfer from govt to Sakilan Desa Sdn Bhd</td> <td data-bbox="1532 887 1711 1125">12.11.1997. 1000 year lease from 5.7.1888 to 04.7.2887</td> <td data-bbox="1718 887 1926 1125">Signed between Govt of State of Sabah and Sakilan Desa Sdn Bhd on 18.12.1997</td> </tr> <tr> <td data-bbox="1137 1129 1525 1393">CL 075471242, area =1294.8 ha 1st registered owner = The North Borneo Trading Co. Ltd. 16.4.1953, London and transfer to 2nd Owner on 12.8.1960 (Tay Chee Hiong, Hong Teck Guan, Tan Kok</td> <td data-bbox="1532 1129 1711 1393">12.11.1997. 1000 year lease from 5.7.1888 to 04.7.2887</td> <td data-bbox="1718 1129 1926 1393">Signed between Govt of State of Sabah and Sakilan Desa Sdn Bhd on 18.12.1997</td> </tr> </tbody> </table>	Grant no./ History of ownership	Date of Title / lease period	Remarks	CL 075471260, area = 999.6 ha direct transfer from govt to Sakilan Desa Sdn Bhd	12.11.1997. 1000 year lease from 5.7.1888 to 04.7.2887	Signed between Govt of State of Sabah and Sakilan Desa Sdn Bhd on 18.12.1997	CL 075471288, area = 1.974 ha direct transfer from govt to Sakilan Desa Sdn Bhd	12.11.1997. 1000 year lease from 5.7.1888 to 04.7.2887	Signed between Govt of State of Sabah and Sakilan Desa Sdn Bhd on 18.12.1997	CL 075471242, area = 1294.8 ha 1 st registered owner = The North Borneo Trading Co. Ltd. 16.4.1953, London and transfer to 2 nd Owner on 12.8.1960 (Tay Chee Hiong, Hong Teck Guan, Tan Kok	12.11.1997. 1000 year lease from 5.7.1888 to 04.7.2887	Signed between Govt of State of Sabah and Sakilan Desa Sdn Bhd on 18.12.1997	<p>Complied</p>
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		<p>Shiong, Tan Kok Hong and Lai wing Yip) then on 3.9.1964 to 3rd Owner Teck Ann Company Ltd then on 20.8.1973 to 4th owner Teck Guan Company Sdn Bhd and on 20.08.197to 5th Owner Gaya House Sdn Bhd 3 and finally to 6th Owner Sakilan Desa Sdn Bhd on 11.7.1979</p>			
Linbar 1 Estate					
<p>CL 09511667 area =4840.0 ha Direct transfer from Government of the State of Sabah Linbar Estate Sdn Bhd T&C = Cultivation of Oil Palm</p>		<p>999 years leased directly from 1.1.1983 – 31.12.2981</p>	<p>Signed between Govt of State of Sabah and Linbar Estate Sdn Bhd on 08.07.1983. IOI Management divide the land into 2 estates, namely Linbar 1 estate and Linbar 2 Estate, each having an area of 2628.17 ha and 2211.83</p>		

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				ha respectively.	
		Linbar 2 Estate share the same land title with Linbar 1 Estate	-	There is no land encroachment nor land conflicts.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no new leasing of land recorded in previous year. There are no records of land dispute for the estates. The land for Linbar 2 and Linbar 1 Estate is lease land from the Sabah Government on 08/07/1983 (land title – 095311667; plan number 09127907). The land was leased to Linbar Estate Sdn Bhd and later transferred to Rights Purpose Sdn Bhd on 21/11/1997. Rights Purpose Sdn Bhd is a subsidiary of IOI group. The land leased until 31/12/2081. For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.			Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities’ and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.			Complied

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4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no new leasing of land recorded in previous year. There are no records of land dispute for the estates. The land for Linbar 2 and Linbar 1 Estate is lease land from the Sabah Government on 08/07/1983 (land title – 095311667; plan number 09127907). The land was leased to Linbar Estate Sdn Bhd and later transferred to Rights Purpose Sdn Bhd on 21/11/1997. Rights Purpose Sdn Bhd is a subsidiary of IOI group. The land leased until 31/12/2081. For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Land maps for the leased land. 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. Sakilan Estate Map was GIS generated internally by GIS Department, survey dated 14.3.2018, GIS Data used based on Mar 2017. Sakilan POM is within the Sakilan estate land. Linbar 1 Estate Map was GIS generated internally by GIS Department. Survey date based on January 2019, Map created: 16.8.2019 Linbar 2 Estate Map was GIS generated internally by GIS Department. Survey date based on September 2018, Map created: 21.9.2018	Complied

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4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Demonstrable rights of land ownership were verified as per land title issued by the Director of Land and Surveys Office, Government of State of Sabah. Land tenure and ownership history is as shown in Indicator 4.4.1 above.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	No new planting activities at Sakilan POM and supply bases.	Not Applicable

4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	No new planting activities at Sakilan POM and supply bases.	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	No new planting activities at Sakilan POM and supply bases.	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	No new planting activities at Sakilan POM and supply bases.	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	No new planting activities at Sakilan POM and supply bases.	Not Applicable
4.5.7	<p>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.</p> <p>- Minor compliance -</p>	No new planting activities at Sakilan POM and supply bases.	Not Applicable

4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new planting activities at Sakilan POM and supply bases.	Not Applicable
Criterion 4.6 Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
Criterion 4.7 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			

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4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
Criterion 4.8			
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied

4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	For FPIC, the Grievance Procedure for Land Owner is available but so far, no land dispute cases in Sakilan POM and supply bases.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1			
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	This indicator is not applicable since Sakilan POM did not source its FFB from smallholders.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	This indicator is not applicable since Sakilan POM did not source its FFB from smallholders	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	This indicator is not applicable since Sakilan POM did not source its FFB from smallholders	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the	This indicator is not applicable since Sakilan POM did not source its FFB from smallholders	Complied

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	contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -																							
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	This indicator is not applicable since Sakilan POM did not source its FFB from smallholders.	Complied																					
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	This indicator is not applicable since Sakilan POM did not source its FFB from smallholders.	Complied																					
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	<p>There are two weighbridge equipment at Sakilan POM. Details are as follow:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>Brand</td> <td>METTLER TOLEDO</td> <td>FINE 8000 C</td> </tr> <tr> <td>Identification No. as marked</td> <td>SSD-ADTK O22281</td> <td>SSD-ATK 003022</td> </tr> <tr> <td>Particulars</td> <td>80,000kg X 10kg</td> <td>60,000kg X 10kg</td> </tr> <tr> <td>Equipment No.</td> <td>B 417533751</td> <td>1711017</td> </tr> <tr> <td>Safety Sticker No.</td> <td>1.9k 056600</td> <td>1.9k 056537</td> </tr> <tr> <td>Calibration date</td> <td>09.07.2020</td> <td>13/05/2020</td> </tr> <tr> <td>Calibrated by</td> <td>Metrology Corporation Malaysia Sdn Bhd</td> <td>Metrology Corporation Malaysia Sdn Bhd</td> </tr> </table> <p>The Mill FFB Suppliers are own IOI estates, that is, Sakilan Desa Sdn Bhd (Sakilan Estate) and Right Purpose Sdn Bhd (Linbar 1 and Linbar 2 Estate).</p>	Brand	METTLER TOLEDO	FINE 8000 C	Identification No. as marked	SSD-ADTK O22281	SSD-ATK 003022	Particulars	80,000kg X 10kg	60,000kg X 10kg	Equipment No.	B 417533751	1711017	Safety Sticker No.	1.9k 056600	1.9k 056537	Calibration date	09.07.2020	13/05/2020	Calibrated by	Metrology Corporation Malaysia Sdn Bhd	Metrology Corporation Malaysia Sdn Bhd	Complied
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		<p>Sakilan POM (FFB Recipient) will issue Weighbridge ticket. Details include</p> <ul style="list-style-type: none"> • MPOB Licence No. of Supplier • Weighbridge Ticket No.; Date, Time in /Out; Vehicle no. • Account No. • Chit No., • DO No. cross reference with DO Chit from Supplier • Block / year • Driver's name • Gross and Nett Weight • Potential OER and Graded OER, Deduction OER • RSPO Certificate Number 	
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>This indicator is not applicable since Sakilan POM did not source its FFB from smallholders</p>	Not Applicable
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>This indicator is not applicable since Sakilan POM did not source its FFB from smallholders.</p>	Not applicable
<p>Criterion 5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their</p>	<p>There is no smallholders scheme or send their FFB to Sakilan POM. Sakilan POM is receive FFB only from its own supply bases.</p>	Not Applicable

	supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -		
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There is no smallholders scheme or send their FFB to Sakilan POM. Sakilan POM is receive FFB only from its own supply bases.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There is no smallholders scheme or send their FFB to Sakilan POM. Sakilan POM is receive FFB only from its own supply bases.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There is no smallholders scheme or send their FFB to Sakilan POM. Sakilan POM is receive FFB only from its own supply bases.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There is no smallholders scheme or send their FFB to Sakilan POM. Sakilan POM is receive FFB only from its own supply bases.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	IOI Group has developed and implemented Equal Opportunity Employment & Freedom of Association Policies dated October 2017 in both languages where the company respects the freedom of association and collective bargaining to the workers. The workers have the right to join or form trade unions of their own choosing	Complied

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		<p>without prior authorization and to bargain collectively. The policy has been displayed at notice board in office and linesite.</p> <p>The briefing of Policy was conducted at respective unit as below:</p> <ol style="list-style-type: none"> 1. Linbar 1 Estate: 29/09/2020. 2. Linbar 2 Estate: 05/02/2020. 3. Sakilan Estate: 03/11/2020. 4. Sakilan POM: 01/10/2020. <p>Interview conducted with internal stakeholders among both local and foreign workers confirmed that they not been discriminated by the company.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>There are no discrimination practices as all workers (foreign and locals) were obtained the same housing and amenities, salary rate and etc. Sighted the workers with same work scope but different gender has the same rate of salary for the month of Jan, June and Sept 2020 as below:</p> <p>Linbar 1 Estate:</p> <ol style="list-style-type: none"> a) Employee ID: 1SRP/IOI/1215/5027 b) Employee ID: 1SRP/IOI/0313/5042 c) Employee ID: 1SRP/IOI/1015/5231 d) Employee ID: 1SRP/IOI/0115/5025 <p>Linbar 2 Estate:</p> <ol style="list-style-type: none"> a) Employee ID: 1SRP/IOI/1212/5570 b) Employee ID: 1SRP/IOI/0319/5652 c) Employee ID: 1SRP/IOI/0116/6766 d) Employee ID: 1SRP/IOI/1017/5765 <p>Sakilan POM:</p> <ol style="list-style-type: none"> a) Employee ID: 1SHL/IOI/0114/6912 b) Employee ID: 1SHL/IOI/0510/6924 	Complied

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		c) Employee ID: 1SHL/IOI/0417/6959	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The company has practices to conduct medical check-up prior recruitment of workers or continue of employment of workers as per the Procedure of Recruitment of Workers. If the result of FOMEMA found unfit, the workers will be repatriate. The recruitment of workers will be based on the medical fitness of workers. Interviewed with the workers found that no unfair recruitment has occurred in the company.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within IOI Sakilan complex underwent Urine Pregnancy Test (UPT) conducted by Hospital Assistant on monthly basis as per sample sighted as following:</p> <ul style="list-style-type: none"> - Sakilan Estate: Total women employee handling chemical = 27; Latest test date: 5/3/2021; Result: 27 negatives; 0 positive - Sakilan POM: Total women employee in mill = 12; Latest test date: 4/3/2021; Result: 12 negatives; 0 positive - Linbar II Estate: Particulars of Health and Pregnancy Test for Female Store Keeper, Sprayer, Manurer & Nursery; Date: 1/3/2021 	Complied
6.1.5	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Group has developed and implemented Garis Panduan Pelaksanaan Women and Empowerment Committee (WEC) Ref No: IOI/G/SE/001 Rev 01 dated 17/02/2020 where the function of the committee has been clearly outlined in the procedure. Besides, the policy has ensured that the victim can be remained anonymous and will not be subject to any form of retaliatory action for submitting the complaint. All grievances submitted will remained as confidential.</p>	Complied

		The Women and Empowerment Committee was established in Sakilan Estate, Linbar 2 Estate, Linbar 1 Estate and Sakilan POM. Meeting was conducted on 17/02/2020 & 12/11/2020 in Sakilan Estate, 24/06/2020 and 22/10/2020 in Linbar 1 Estate, 08/09/2020 in Linbar 2 Estate, 14/03/2020 and 29/09/2020 in Sakilan POM. No issue was reported during the meeting. Interviewed with the female workers confirmed that they are understood the procedure to lodge complaint if they have any sexual harassment cases. As to date, there was no case of sexual harassment reported as informed by them.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Sighted the pay slip for both female and male sprayers have the same rate for same work scope as sighted in pay slip in clause 6.2.3.	Complied
Criterion 6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Reference been made to Sabah Labour Ordinance was clearly mentioned in the muster briefing and addendum of worker's employment contract/vacation leave pay/employee identification cum input document dated February 2020 as below: Linbar 1 Estate: 15/09/2020 & 07/09/2020. Linbar 2 Estate: 11/09/2020. Sakilan Estate: 08/09/2020 Sakilan POM: 05/09/2020.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal	Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts as below:	Complied

	<p>requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Linbar 1 Estate:</p> <p>a) Employee ID: 1SRP/IOI/1215/5027 b) Employee ID: 1SRP/IOI/0313/5042 c) Employee ID: 1SRP/IOI/1015/5231 d) Employee ID: 1SRP/IOI/0115/5025</p> <p>Linbar 2 Estate:</p> <p>a) Employee ID: 1SRP/IOI/1212/5570 b) Employee ID: 1SRP/IOI/0319/5652 c) Employee ID: 1SRP/IOI/0116/6766 d) Employee ID: 1SRP/IOI/1017/5765</p> <p>Sakilan POM:</p> <p>a) Employee ID: 1SHL/IOI/0114/6912 b) Employee ID: 1SHL/IOI/0510/6924 c) Employee ID: 1SHL/IOI/0417/6959 d) Employee ID: 1SHL/IOI/0417/6985</p>	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>The worker's pay slips for March, May & Oct 2020 shows the compliance to Sabah Labour Ordinance and Minimum Wage Order 2020.</p> <p>Sample sighted as below:</p> <p>Linbar 1 Estate:</p> <p>a) Employee ID: 1SRP/IOI/1215/5027 b) Employee ID: 1SRP/IOI/0313/5042 c) Employee ID: 1SRP/IOI/1015/5231 d) Employee ID: 1SRP/IOI/0115/5025</p> <p>Linbar 2 Estate:</p>	<p>Complied</p>

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		<p>a) Employee ID: 1SRP/IOI/1212/5570 b) Employee ID: 1SRP/IOI/0319/5652 c) Employee ID: 1SRP/IOI/0116/6766 d) Employee ID: 1SRP/IOI/1017/5765</p> <p>Sakilan POM: a) Employee ID: 1SHL/IOI/0114/6912 b) Employee ID: 1SHL/IOI/0510/6924 c) Employee ID: 1SHL/IOI/0417/6959 d) Employee ID: 1SHL/IOI/0417/6985</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities in compliance with the Workers Minimum Housing and Amenities Standard Act 1990 provided by the company as evidence from the site visit. Regular monitoring also conducted as per sample records of following:</p> <ul style="list-style-type: none"> - Latest VMO visit Sakilan Estate; Date: 17/3/2020, previous visit by VMO conducted line site inspection dated 4/3/2021 - Sakilan POM latest housing inspection records i.e. Checklist Inspection of Labour Line conducted on 26/3/2021. Latest VMO visit date: 17/3/2020 <p>Fogging was latest conducted on 15/3/2021 as per sample Fogging Schedule Records.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Based on the sample records, Sakilan POM monitored through records of price comparison in sundry shop available within workers housing area. Sighted price comparison made for the month of Sep-20, Oct-20, Nov-20, Dec-20, Jan-21 & Feb-21. Other grocery shop operator i.e. Kedai Runcit Maju Jaya sundry shop price list also available.</p>	Complied

<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>(Endorsed by the RSPO BoG on 7th November 2019)</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in</p>	<p>IOI has engaged Monash University on the Decent Wages in the Malaysia Palm Oil Industry and the report published on 02/04/2020. The topic discussed includes the living wage benchmark, site visits and foreign workers.</p> <p>In summary, based on the worker’s nationality, the decent living wage after taking into consideration of income tax, social security, food cost and housing cost it can be concluded that the nett living wage based on nationalities is as below:</p> <ol style="list-style-type: none"> 1. Indonesia: RM 1,183.907 2. India: RM 791.26 3. Bangladesh: RM 1,088.50 	<p>Complied</p>
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<p>accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage</i> (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment 		
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	<ul style="list-style-type: none"> The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 and 6.2.3 above. No casual, temporary and day labour employed within all operating units within IOI Sakilan complex.</p>	Complied
<p>Criterion 6.3</p> <p>The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Group has developed and implemented Equal Opportunity Employment & Freedom of Association Policies dated October 2017 in both languages where the company respects the freedom of association and collective bargaining to the workers. The workers have the right to join or form trade unions of their own choosing without prior authorization and to bargain collectively. The policy has been displayed at notice board in office and linesite.</p> <p>The briefing of Policy was conducted at respective unit as below:</p> <ol style="list-style-type: none"> Linbar 1 Estate: 29/09/2020. Linbar 2 Estate: 05/02/2020. Sakilan Estate: 03/11/2020. Sakilan POM: 01/10/2020. <p>Interview conducted with internal stakeholders among both local and foreign workers confirmed that they have the freedom of</p>	Complied

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		association and right to collective bargaining with the company's management.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request as per samples sighted as following: - Sakilan Estate Minutes of Meeting records of Mesyuarat Jawatankuasa Rundingan Bersama Majikan (JCC) kali ke-4 2020; Date: 03/11/2020 - Sakilan POM Jawatankuasa Persidangan Diantara Pekerja dan Majikan (JCC); Date: 01/10/2020; Venue: Mill office - Linbar I Estate Minit Mesyuarat Jawatankuasa Perundingan Bersama Joint Consultative Committee (JCC) Kali Pertama 2021; Date: 29/01/2021	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Based on the interview conducted with the workers' representatives and records of JCC election at all operating units within IOI Sakilan, it was confirmed that management does not interfere with the formation or operation of the workers committee.	Complied
Criterion 6.4			
Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	IOI Group has developed and implemented Sustainability Palm Oil Policy dated March 2018 where the company eliminates child labour in the company. Reviewed of the name list of workers found that	Complied

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		the workers recruited with minimum age of 18 years old. The briefing of Policy was conducted at respective unit as below: <ol style="list-style-type: none"> 1. Linbar 1 Estate: 29/09/2020. 2. Linbar 2 Estate: 05/02/2020. 3. Sakilan Estate: 03/11/2020. 4. Sakilan POM: 01/10/2020. 	
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	All the workers have their own individual file namely 'Employee Identification cum Input Document' where the evidence of date of birth include the passport detail available.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	As per worker's name list, all the workers are more than 18 years hired in Sakilan Complex. It was further verified with the stakeholders (school teacher, villagers, contractors, etc.) and workers during interview session.	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. - Minor compliance -	Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them. Records of communication also available as per sample sighted for hardware supplier of Sakilan Estate i.e. Chuan Yee Hardwares Sdn. Bhd./Kebaco Sdn. Bhd. that was signed on 1/6/2020.	Complied
Criterion 6.5			
There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	The company has implemented Policy on Harassment at Workplace dated June 218 where the company is committed to promote a safe and healthy working environment. The company has zero tolerance	Complied

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	<p>- Critical (Major) compliance -</p>	<p>for any form of harassment at workplace. The policy serves as a guidance on handling matters related to harassment.</p> <p>The briefing of Policy was conducted at respective unit as below:</p> <ol style="list-style-type: none"> 1. Linbar 1 Estate: 29/09/2020. 2. Linbar 2 Estate: 05/02/2020. 3. Sakilan Estate: 03/11/2020. 4. Sakilan POM: 01/10/2020. <p>Interview conducted with internal stakeholders among both local and foreign workers mainly women confirmed that they aware of their reproductive rights and understand how to respond to sexual harassment and/or violence in case of any. So far none happen.</p>	
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The company has implemented IOI Group Sustainable Palm Oil Policy dated October 2020, mentioned that the will protect reproductive health of women employees and promote women empowerment.</p> <p>The briefing of Policy was conducted at respective unit as below:</p> <ol style="list-style-type: none"> 1. Linbar 1 Estate: 29/09/2020. 2. Linbar 2 Estate: 05/02/2020. 3. Sakilan Estate: 03/11/2020. 4. Sakilan POM: 01/10/2020. <p>Interview conducted with internal stakeholders among both local and foreign workers mainly women confirmed that they aware of their reproductive rights.</p>	<p>Complied</p>

6.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>New mothers' assessment was undertaken by gender committee representatives as per records of gender committee meeting conducted on 17/02/2020 & 12/11/2020 in Sakilan Estate, 24/06/2020 and 22/10/2020 in Linbar 1 Estate, 08/09/2020 in Linbar 2 Estate, 14/03/2020 and 29/09/2020 in Sakilan POM.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them.</p> <p>No grievance issues that requires the implementation of the mechanism occurs in all operating units within IOI Sakilan complex since the last audit.</p>	Complied
<p>Criterion 6.6 No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>It was well mentioned in the IOI Group Sustainability Palm Oil Policy dated October 2020 that:</p> <ol style="list-style-type: none"> 1. Company will eliminate all forms of illegal, forced, bonded, compulsory or child labour and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process whether by us, our contractors, our agents or their sub-agents in receiving and sending countries. 2. No retention of worker's passport/identity documents or withholding of workers' wages other than that prescribed by law. <p>Interview conducted with internal stakeholders among both local and foreign workers confirmed that the company do not force them to work and all foreign workers are legal.</p>	Complied

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6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>There were Indonesian and Philippine workers hired in Sakilan Certification Unit.</p> <p>IOI Group has developed Sustainable Palm Oil Policy dated October 2020 and Foreign Workers Recruitment Guideline & Procedure in Malaysia revised on July 2018 where the company has provided induction and orientation training to the workers on the employment contract, wages, benefits such as medical leave and overtime, rules and regulation, safety training and Malaysia's culture. Besides, the company provide fair and equal employment opportunities to all workers and provide decent living condition.</p>	Complied
<p>Criterion 6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The Policy for Occupational Safety, Health and Hygiene Policy in IOI dated April 2019 was amended from previous Policy dated March 2018 and acknowledged by N B Sudhakaran.</p> <p>The respective Mill and Estate Manager has appoint an Assistant Manager as the person in charge (PIC) for safety and environment. The PIC role covers areas of responsibilities on safety, health and welfare of the staff/workers. The Mill and Estates Managers were appointed as the Chairman for the ESH committee. His duties among others was to preside the ESH meetings, discharge the General Duties of Employers and make decision arising out of issues discussed for improvement of Safety, Health, Welfare and the Environment.</p> <p>OSH meeting at Sakilan POM is conducted quarterly by management; dated 28/9/2020, and previous record was on 3/6/2020 and 26/3/2020.</p>	Complied

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		<p>En Sudirman was appointed as responsible person and workers representative for H&S on 9/7/2020. For management representative En Mohd Ezman was appointed on 9/7/2020</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Briefings to employees on safety policy are made through training and briefing forums. In addition there were also briefings at muster ground as refresher program for the employees. Safety procedures adherence are emphasised to the employees as part of the work culture. Content includes prioritise safety, execute work safely, and adhere all safety rules and regulations and to target zero accident. Safety policy and targets were available on display board printed in both English & Bahasa Malaysia.</p> <p>OSH meeting are held periodically 3 monthly. The latest meeting was conducted on 20/10/2020 and previous meeting was on 8/7/2020.</p> <p>IOI Plantations has established flow chart for Emergency Response Plan documented in Safety and health Plan under Emergency Response Plan. The ERP covers Accident for plantations tractor and lorry driver, Physical Injury, Fire outbreak, Flood, Chemical spillage at storage/premix area and Chemical spillage in the field CPO, Diesel and lubricant spillage.</p> <p>The management provided First aid training to First aider in the estate. The verification onsite showed the first aid all available at all field operation as per First aid checklist dated 29/1/2020</p> <p>In Sakilan estate, training on fire drill conducted on 19/9/2020 by Mr Romeo, First aid conducted on 14/10/2020 by Pn Jalinah bt Rachman (Estate Hospital Assistant) and attended by 8 mandore (First aider). Record JKKP 8 available dated 17/1/2020 (JKKP 8/51199/2019 with LTA 56.17 days.</p>	<p>Complied</p>

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		<p>For Linbar 2 estate, the record of JKKP 8/53160/2019 dated 21/01/2020 with LTA 17.54 days. Accident record was kept accordingly, JKKP 8 dated 10/1/2020.</p> <p>For Linbar 1, the record LTA was 48.01 days. The previous year only have 1 record of JKKP 6 with total 24 days as per Medical Certificate(MC).</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>PPEs are issued according to standard operating procedure (Safety work procedure), HIRARC and CHRA recommendation. Management also establish StOPs for Palm Oil Mill - IOI/StOP/A; Issue No: 2 dated: 1/7/2017 to ensure safety work in all potential hazardous operation such as machine operations. The PPE issuance record for Boiler operator, steriliser operator and workshop operator is available dated 11/2/2021.</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>All workers was provided with medical care and covered by SOCSO. The cost incurred from work related incident leading to injury and sickness are covered by SOCSO and IOI management,. Sampling of incident cases as per below:-</p> <p>In Mill, as per JKKP 8 (JKKP 8 /67622/2020) dated 8/1/2021 stated there are 4 accident happen in 2020. Sampling on 2 accident, the MC with total 3 days was covered by employer, verified as per payslip on Sept 2020.</p> <p>In Linbar 2 estate, sampling on accident happen on Dec 2020 in harvesting operation. The workers got medical certificate with total 7 days. The worker was covered by SOCSO and management already in progress for claim as per application PA-F101R1 dated 25/1/2021.</p>	Complied

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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of accidents are maintained and summarized in the relevant form and submitted to DOSH as per OSH NADOPOD Regulations 2004. The occurrence of accidents recorded for YTD November 2019 is as shown below: <table border="1" data-bbox="1137 507 1930 753"> <thead> <tr> <th>Operating Unit</th> <th>LTA (days)</th> </tr> </thead> <tbody> <tr> <td>Sakilan POM</td> <td>12.32</td> </tr> <tr> <td>Sakilan Estate</td> <td>56.17</td> </tr> <tr> <td>Linbar 1</td> <td>48.01</td> </tr> <tr> <td>Linbar 2</td> <td>17.54</td> </tr> </tbody> </table>	Operating Unit	LTA (days)	Sakilan POM	12.32	Sakilan Estate	56.17	Linbar 1	48.01	Linbar 2	17.54	Complied
Operating Unit	LTA (days)												
Sakilan POM	12.32												
Sakilan Estate	56.17												
Linbar 1	48.01												
Linbar 2	17.54												

Principle 7: Protect, conserve and enhance ecosystems and the environment

Criterion 7.1
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM plans for implementation at the Sakilan Certification Unit estates 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). Records of planting of new areas and maintenance of existing areas of beneficial plants and location maps were available (predator host plant map). For Pest & Disease (P&D), census was carried out for rat damage on annual basis. Implementation verified, sighted record census for Cassia Cobanensis dated 22 until 29/9/2020 available for review at site.	Complied
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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. - Minor compliance -	Field visits conducted during the audit and didn't found 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 such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	The use of fire for pest control is not practiced.	Complied
<p>Criterion 7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -</p>	<p>Justification of pesticides applied is available in the agriculture policies. Refer to Agricultural Policies, Section 6.0: Weeding – Weed Control and Section 9.0: Pest and Disease. The use of pesticide is specific to the targeted pest, weed and disease. Justification takes consideration to minimize effect on non-target species. The Justification of chemical used in estate available dated 4 July 2019, this include Glyphosate, Metsulfuron methyl, Triclopyr, Fluoxypyr 1 –methyl, Brodifacoum, Propineb, cypermethrin and Diuron.</p> <p>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:</p> <p>No use of paraquat and pesticides that are categorised as World Health Organisation Class 1A or 1B. 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, with special</p>	Complied

		method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.									
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>The record of pesticide usage (A.I per Ha) was available this included the area been treated, the amount of chemical been used and also the application record, the A.I per HA as per below:-</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>A.I / ha</th> </tr> </thead> <tbody> <tr> <td>Sakilan estate</td> <td>0.216</td> </tr> <tr> <td>Linbar 1</td> <td>2.00</td> </tr> <tr> <td>Linbar 2</td> <td>1.96</td> </tr> </tbody> </table>	Estate	A.I / ha	Sakilan estate	0.216	Linbar 1	2.00	Linbar 2	1.96	Complied
Estate	A.I / ha										
Sakilan estate	0.216										
Linbar 1	2.00										
Linbar 2	1.96										
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The IPM plan (beneficial plant programme) available for 2020. This includes Cassia Cobanensis (60%), Antigonon Leptosus (20%), and Tunera Subulata (20%). The Plan cover in all estate, sampling on Linbar 2 estate for November 2020 in field 91L (60 chain) and 91K (63 chain) For December record implementation of Cassia cobanensis in field 14 A (69 chain), and 14D (75 chain).</p>	Complied								
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>Not applicable because there has been no prophylactic use of pesticides at the visited estates.</p>	Complied								
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat</p>	<p>The management only purchase chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Sighting of the Chemical Register dated 30/11/2018 at these estates showed that only class II, III & IV chemicals were used. There were no Class 1A and Class 1B agrochemicals used.</p> <p>Paraquat was eliminated. In replace, alternatives such as Glyphosate were used instead. Verification on chemical register also</p>	Complied								

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	<p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>no record of class I pesticide been used in all sampling estate. HIRARC assessment already cover all operation activity in estate, this including spraying, harvesting and others. The management already reviewed dated 1/7/2020 by HSE Executive and assistant. CHRA was conducted by Dr Mohd Azizan from DAB OH Sdn Bhd dated 12 Nov 2020 (Ref: HQ/11/ASS/00/298-2020/217). Medical Surveillance was done on 2/11/2020 at DAB OH Sdn Bhd. By Dr Donny Cristanto (HQ/19/DOC/00/00399).</p>	
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were handled, used or applied by trained workers in accordance with the product label. In addition to the product label, Safety Data Sheets were used and explained to the participants.</p>	<p>Complied</p>
<p>7.2.7</p>	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH Regulations (2000). At all visited estates the storage of pesticides was in accordance with recognized best practices. They were stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level.</p>	<p>Complied</p>

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7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	In Sakilan estate, last disposal of pesticide containers with triple rinsed and punctured was on 22/8/2019 at Newgates Industries (Borneo) S/B with total 1060kg.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No Aerial spraying conducted in all estates. Verified as per interview and document review.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Medical surveillance in Sakilan estate was conducted on 2/7/2020 at DAB OH Sdn Bhd with total 28 people including store keeper, sprayer, rat baiting, and workshop. All fit to work with chemical. In Sakilan Mill, Medical surveillance was conducted on 2/9/2020 with total 45 people including laboratory, Storekeeper, workshop, boiler, and effluent.	Complied
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	Pregnant and breast-feeding women are strictly not allowed to work with pesticides. Noted that there were a few women working as chemical mixers (prepacking) and sprayers. Verified that the female workers were checked for pregnancy test at three-month interval by the on-site Medical Assistant. All results showed negative findings. Verified with master list of workers and interview with management and workers no record of workers under 18 in all estate.	Complied

Criterion 7.3
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.

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<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Wastes management plan is documented and incorporated with internal Environmental Impact Assessment of all the sampled operating units. Among the wastes identified are:</p> <ul style="list-style-type: none"> • Scheduled wastes & empty chemical containers • Clinical wastes • Domestic & recyclable wastes, sewage and garden residue • POME • Scrap iron • Fibre & shell <p>Scheduled wastes were disposed through licensed vendors and records of disposal were maintained in accordance to EQA Regulations whereas the empty chemical containers, apart from being used for containing pre-mixed herbicides, were triple-rinsed and sent to recycler vendor.</p>	<p>Complied</p>
<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The proper disposal of waste material was according to the company procedure as per sampling below verification;- Sakilan POM</p> <ol style="list-style-type: none"> 1. The mill act as collection centre for Sakilan Estate. The mill monitored the scheduled waste inventory for both Sakilan Estate and Sakilan POM in Scheduled Waste Records form before submitted to DOE through ESWISS system on monthly basis. Reviewed the Scheduled Waste Records form and ESWISS Scheduled II for the month of February 2021 found the data is consistent. 2. The mill disposed the Scheduled Waste through licensed contractors. Reviewed the consignment note as follows: <ol style="list-style-type: none"> a. 16/11/2020, SW 110, C/N no. 2020111618TKONPR b. 16/11/2020, SW 102, C/N no. 2020111617YZD320 	<p>Complied</p>

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		<p>c. 16/11/2020, SW 305, C/N no. 2020111618VFHDX d. 16/11/2020, SW 410, C/N no. 2020111618ZA5RS0 e. 16/11/2020, SW 417, C/N no. 2020111618P3Z1KX</p> <p>3. The mill disposed scrap iron through appointed contractor by HQ. Latest disposal was conducted on 07/01/2021 as per Delivery Order no. SA121000001.</p> <p>4. Domestic waste collection waste manage by the mill and send to for disposal at Sakilan Estate designated landfill. The domestic waste collection was done once a week. Reviewed the collection records for the month of January 2021 dated 03/01/2021, 10/01/2021, 17/01/2021, 24/01/2021 and 31/01/2021.</p> <p>Sakilan Estate</p> <p>1. The estate monitor the inventory of the scheduled waste documented in Scheduled 2 and reported to Sakilan POM on monthly basis. Reviewed inventory records for SW 110, SW 112, SW 305 and SW 410 for the month of November and December 2020. The estate send the scheduled waste to central collection centre at Sakilan POM before disposal.</p> <p>2. The estate disposed the domestic waste in designated landfill. The landfill located in field P97W. The waste were segregated before disposed. The 3R items were segregated and sent for recycle.</p> <p>Linbar 1 Estate</p> <p>1. The estate disposed the domestic waste in designated landfill. The landfill located in field P18A. The waste were segregated before disposed. The 3R items were segregated and sent for recycle.</p>	
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		<p>2. The estate disposed scrap iron through appointed contractor by HQ. Latest disposal was conducted on 19/08/2020 as per payment voucher no. 0103 and 0104</p> <p>3. Latest recycle waste disposal was conducted on 10/09/2020 as per official receipt no 21611 dated 21611.</p> <p>4. The estate monitor the inventory of the scheduled waste documented in Scheduled 2 and reported to Sakilan POM on monthly basis. Reviewed inventory records for SW 410, SW 409, SW 305, SW 104 and SW 410 for the month of February 2021. The estate send the scheduled waste to central collection centre at Sakilan POM before disposal. Reviewed the evidence of SW received by the mill as per Weighbridge ticket no. SC21000030 dated 16/03/2021 and SC21000008 dated 15/01/2021</p> <p>Linbar 2 Estate</p> <p>1. The estate monitor the inventory of the scheduled waste documented in Scheduled 2 and reported to Sakilan POM on monthly basis. Reviewed inventory records for SW 102, SW 104, SW 305, SW 409 and SW 410 for the month of February 2021. The estate send the scheduled waste to central collection centre at Sakilan POM before disposal. Reviewed the evidence of SW received by the mill as per Weighbridge ticket no. SC21000013 dated 15/03/2021.</p> <p>2. The estate ensure the appointed mill disposed the Scheduled Waste through licensed contractors. Reviewed the consignment note as follows:</p> <ul style="list-style-type: none"> a. 05/12/2020, SW 109, C/N no. 20201208E5OLKQ b. 13/12/2020, SW 110, C/N no. 2020120912V9SX18 c. 14/12/2020, SW 409, C/N no. 20201214145681CY d. 13/12/2020, SW 417, C/N no. 2020120914CREJGL 	
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		e. 05/12/2020, SW 410, C/N no. 2020120914XC1I6W	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	No evidence of fire use for waste disposal. The estate disposed the domestic waste in designated landfill.	Complied
Criterion 7.4			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	IOI group has established Group Standard Operating Procedure (StOP) for Land Clearing, index 4.1 and Group Standard Operating Procedure (StOP) for Land Preparation for New Planting and Replanting, index 4.2 prepared on September 2007. No site visit during remote audit due to Covid 19 issue and MCO requirement. IOI has established 3 SOP as guidance to conduct the estate daily operation. IOI has established Group Standard Operating Procedures as guidance document to operate the estate issued on September 2007. Latest review was done in December 2016 with additional on StOP for Planting Beneficial Plant and Stop for management and Monitoring of Existing Cultivation of Oil Palm on Peat. The SOP covers all 17 activities such as Seed Production, Planting Techniques, Manuring, Weeding, Pest and Disease, Harvesting and Planting of Beneficial Plants. The record of efb implementation was available, EFB application in linbar 2 estate on August 2020 with total 47.58 mt.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	The soil fertility management at all the estates was guided by the IOI group SOP, Section 8.0: Manuring and Section 15.0: Foliar sampling. The practices consistently monitored by estate operation management and estate. Sampling in Sakilan estate foliar sampling and soil sampling was done on 17 Sept 2020 by the Agronomist from IOI Research Centre Sabah	Complied

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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. - Minor compliance -	SOP/WI/programmes which has the information about application of EFB/POME/palm residues. The record of EFB implementation was available, EFB application in Linbar 2 estate on August 2020 with total 47.58 mt.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The record of fertiliser input was maintained properly by management of each sampling estate, to verify the implementation in Sakilan estate sampling on application of NK Mix record with total 18 MT in Field 97A. The data from costing book and fertiliser issuance record was accurate.	Complied
Criterion 7.5 Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Maps identifying marginal and fragile soil, including steep terrain were available for verification. They were prepared by IOI GIS Department, dated June 2018. Among the information available in the soil maps is landform, parent materials and main soil units. The information in the slope maps is among others the degree of slope and area covered (in %).	Complied
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. - Minor compliance -	IOI Plantation has established Standard Operating Procedures for oil palm planting at permitted levels on sloping land documented in Group Standard Operating Procedures (StOPs) for Estate Operations under 2.0: Standard Procedure for Land Preparation for the New Planting and Replanting. Sighted at the replanting area at the estates visited, no replanting was conducted at area more than 25°. All steep area in estates visited was identified and categorised under Conservation area. The area was demarcated with red and white pole. The area as follows:	Complied

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		<table border="1"> <tr> <td>Estate</td> <td>Hectare</td> </tr> <tr> <td>Sakilan Estate</td> <td>2.94 ha</td> </tr> <tr> <td>Linbar 1 Estate</td> <td>2.32 ha</td> </tr> <tr> <td>Linbar 2 Estate</td> <td>0.00 ha</td> </tr> </table> <p>As per Conservation area management plan established, the area to be abandon from any development and left the natural vegetation to grow.</p>	Estate	Hectare	Sakilan Estate	2.94 ha	Linbar 1 Estate	2.32 ha	Linbar 2 Estate	0.00 ha	
Estate	Hectare										
Sakilan Estate	2.94 ha										
Linbar 1 Estate	2.32 ha										
Linbar 2 Estate	0.00 ha										
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There was no new planting at the Sakilan Certification Unit.	Complied								
<p>Criterion 7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>											
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -</p>	<p>Management establish Group Standard Operating Procedures (StOPs) for estate Operations Master List dated September 2007 to ensure of long term suitability of land for Palm oil cultivation. This manual include planting density, land clearing and preparation, Leguminous cover plant, Manuring, weeding, Pest and disease and others.</p> <p>Soil map was available for all estate, Sampling in Linbar 1 estate, the map based from GIS data used on Inventory January 2019 prepared by GIS, Department dated 16 August 2019.</p>	Not Applicable								
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -</p>	No new planting in Certification unit and no fragile soil in sampling estate.	Not Applicable								

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7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	No new planting in sampling estate however the soil map was available for all estate, sampling in Linbar 1 estate, the map based from GIS data used on Inventory January 2019 prepared by GIS, Department dated 16 August 2019.	Not Applicable
Criterion 7.7			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No new planting in sampling estate and no peat soil in Sakilan Certification Unit. As per verification on Soil map dated 21/9/2018 prepared by GIS Department the major soil series in Linbar 2 estate was Silabukan series, Sapi Series and Brantian Series. From the soil analysis by IOI Research Centre, Sabah the organic matter for Sapi Series in estate only 1.16% (96I) dated 5/12/2019.	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. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	No peat soil in Sakilan Certification Unit. As per verification on Soil map dated 21/9/2018 prepared by GIS Department the major soil series in Linbar 2 estate was Silabukan series, Sapi Series and Brantian Series. From the soil analysis by IOI Research Centre, Sabah the organic matter for Sapi Series in estate only 1.16% (96I) dated 5/12/2019.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	No peat soil in Sakilan Certification Unit. As per verification on Soil map dated 21/9/2018 prepared by GIS Department the major soil series in Linbar 2 estate was Silabukan series, Sapi Series and Brantian Series. From the soil analysis by IOI Research Centre, Sabah the organic matter for Sapi Series in estate only 1.16% (96I) dated 5/12/2019.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place.	No peat soil in Sakilan Certification Unit. As per verification on Soil map dated 21/9/2018 prepared by GIS Department the major soil series in Linbar 2 estate was Silabukan series, Sapi Series and	Not Applicable

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	- Critical (Major) compliance -	Brantian Series. From the soil analysis by IOI Research Centre, Sabah the organic matter for Sapi Series in estate only 1.16% (96I) dated 5/12/2019.	
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	No peat soil in Sakilan Certification Unit. As per verification on Soil map dated 21/9/2018 prepared by GIS Department the major soil series in Linbar 2 estate was Silabukan series, Sapi Series and Brantian Series. From the soil analysis by IOI Research Centre, Sabah the organic matter for Sapi Series in estate only 1.16% (96I) dated 5/12/2019.	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil in Sakilan Certification Unit. As per verification on Soil map dated 21/9/2018 prepared by GIS Department the major soil series in Linbar 2 estate was Silabukan series, Sapi Series and Brantian Series. From the soil analysis by IOI Research Centre, Sabah the organic matter for Sapi Series in estate only 1.16% (96I) dated 5/12/2019.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation</p>	No peat soil in Sakilan Certification Unit. As per verification on Soil map dated 21/9/2018 prepared by GIS Department the major soil series in Linbar 2 estate was Silabukan series, Sapi Series and Brantian Series. From the soil analysis by IOI Research Centre, Sabah the organic matter for Sapi Series in estate only 1.16% (96I) dated 5/12/2019.	Not Applicable

	<p>Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>		
<p>Criterion 7.8 Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plan was established by the SPO team for all the operating units under Sakilan Certification Unit, dated October 2020. The objectives of the plan were to conserve and to maintain the availability of surface and ground water through pollution prevention. It outlined the method to conserve and minimise pollution of water through implementation of various methods such as best practice of raw water & effluent treatment, maintaining riparian zone, management of land irrigation, maintaining soft vegetation in the field, regular education to employees on conserving water and water pollution preventions to name a few.</p> <p>The operating units visited provide the workers with adequate clean water through treated water at water treatment plant. Drinking water analysis was conducted twice per year.</p> <p>Sakilan POM and Sakilan Estate</p> <p>Latest drinking water analysis was conducted on 30/12/2020 as per certificate of analysis no. W2012230-018-0 and W201230-01A-0 dated 21/01/2021. There was off spec result for After Chlorination for Fluoride @ 0.7(DWQS @ 0.6), Iron @ 1.396(DWQS @ 0.3) and Manganese @ 0.406(DWQS @ 0.2). The mill has conducted investigation and established action to address the issue. Maintenance for clarifier tank was conducted on 04/02/2021 s recorded in tank cleaning log book and purchase order no. 4531029968 dated 04/02/2021.</p> <p>Linbar 1 Estate</p>	<p>Complied</p>

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		<p>Latest drinking water analysis was conducted on 30/12/2020 as per certificate of analysis no. W2012230-07A-0 and W201230-07B-0 dated 21/01/2021. The results of water analysis after treatment was found conform to National Standard for Drinking Water Quality.</p> <p>Linbar 2 Estate</p> <p>Latest drinking water analysis was conducted on 30/12/2020 as per certificate of analysis no. W2012230-03A-0 and W201230-03B-0 dated 21/01/2021. The results of water analysis after treatment was found conform to National Standard for Drinking Water Quality</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Sakilan Estate</p> <p>The estate has demarcated the riparian buffer zone with red colour ring at the palm trunk along the buffer zone as sighted at the field P97N and P97G.</p> <p>Signboard on prohibition of chemical application along the buffer zone was erected at the area. No evidence of chemical application was sighted at buffer zone in P97N and P97G.</p> <p>The estate conducted river water sampling analysis twice per year. Reviewed the Environmental Compliance Report for 1st half of FY2020 with ref. no. KWEC-(EV)/M/20 dated 10/03/2020. For 2nd half 2020, the sampling was conducted on 24/09/2020.</p> <p>Linbar 1 Estate</p> <p>The estate has demarcated the riparian buffer zone with red and white colour pole and red colour ring at the palm trunk along the buffer zone. Sighted the demarcation of buffer zone at the field P18C with no evidence of chemical application along the area.</p> <p>Signboard on prohibition of chemical application along the buffer zone was erected at the area.</p> <p>River water analysis was conducted three times a year. Latest sampling was conducted on 24/09/2020 as per report ref. no. KEC-</p>	Complied

		<p>(EV)/M/20 for Sg. Tengah that flow through the estate to Sg. Lokan. The results was found conforms to NWQS class III.</p> <p>Linbar 2 Estate</p> <p>The estate has demarcated the riparian buffer zone with red and white colour pole and red colour ring at the palm trunk along the buffer zone. Sighted the demarcation of buffer zone for Sg. Lokan at the field P96C with no evidence of chemical application along the area.</p> <p>Signboard on prohibition of chemical application along the buffer zone was erected at the area.</p> <p>River water analysis was conducted three times a year. Latest sampling was conducted on 24/09/2020 as per report ref. no. KEC-(EV)/M/20. The results was found not conforms to NWQS class III as the Phosphate level were recorded at 0.41 against standard at 0.1. The estate has conducted investigation regarding the matter and suspected that was due to activity from neighbouring estate as the sampling point area was due for replanting and no manuring programmed.</p>							
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system equipped with ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Based on the independent lab report, the mill has maintained below 20 ppm of BOD for the last 12 months.</p> <p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. reviewed the Quarterly Return Form to DOE FY 2020 as follows:</p> <p>2nd quarter</p> <table border="1" data-bbox="1137 1342 1827 1390"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Month	Parameter	Results				Complied
Month	Parameter	Results							

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		<table border="1"> <tr> <td rowspan="2">Apr -</td> <td>BOD</td> <td>N/A</td> </tr> <tr> <td>pH</td> <td>N/a</td> </tr> <tr> <td rowspan="2">May 15/05/2020</td> <td>BOD</td> <td>9.00</td> </tr> <tr> <td>pH</td> <td>19.00</td> </tr> <tr> <td rowspan="2">Jun 11/06/2020</td> <td>BOD</td> <td>8.70</td> </tr> <tr> <td>pH</td> <td>15.60</td> </tr> <tr> <td colspan="3">3rd quarter</td> </tr> <tr> <td>Month</td> <td>Parameter</td> <td>Results</td> </tr> <tr> <td rowspan="2">Jul 01/07/2020</td> <td>BOD</td> <td>16.10</td> </tr> <tr> <td>pH</td> <td>8.70</td> </tr> <tr> <td rowspan="2">Aug 03/08/2020</td> <td>BOD</td> <td>18.20</td> </tr> <tr> <td>pH</td> <td>6.90</td> </tr> <tr> <td rowspan="2">Sep 01/09/2020</td> <td>BOD</td> <td>14.20</td> </tr> <tr> <td>pH</td> <td>8.70</td> </tr> </table> <p>No sampling was conducted for April 2020 due to temporary closure of laboratory due to COVID 19 Movement Control Order as per letter with ref. no. DL/MSG/2020/65 dated 07/04/2020.</p>	Apr -	BOD	N/A	pH	N/a	May 15/05/2020	BOD	9.00	pH	19.00	Jun 11/06/2020	BOD	8.70	pH	15.60	3 rd quarter			Month	Parameter	Results	Jul 01/07/2020	BOD	16.10	pH	8.70	Aug 03/08/2020	BOD	18.20	pH	6.90	Sep 01/09/2020	BOD	14.20	pH	8.70	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from river. The mill has recorded 2.28 m ³ /mt FFB in the last financial year (Jul 2019-Jun 2020).	Complied																																				

Criterion 7.9			
Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Plan for improving efficiency of fossil fuel was spelt out in Environmental Impact Assessment, Management Action Plans & CIP. Among the plans established by the operating units were:</p> <ul style="list-style-type: none"> • Minimise pollution and GHG emission risk by monitoring the effectiveness of diesel consumption by tractors and generator sets • Conversion of conventional lights to energy saving lights • regular service of tractors for efficient running of engines • to switch off electronic appliances whenever not in use • maximising the use of shell and fibre as fuel for boiler operation <p>Reviewed the records of implementation as follows:</p> <ol style="list-style-type: none"> 1. The mill monitored the fossil fuel consumption and power generated. FY July 2019-June 2020, diesel consumption per ton FFB was recorded at 4.68 L/ton FFB with power generated at 17.20 kWh/ton FFB. As to date FY July 2020 – June 2021, diesel consumption power generated was recorded at 23.27 kWh/ton FFB 2. The mill monitored the usage of renewable energy consumption such as fibre and shell for boiler fuel on monthly basis. Reviewed the records of power generated FY July 2019-June 2020 recorded at 22.61 kWh/ton FFB and to date FY July 2020 – June 2021 recorded at 21.92 kWh/ton FFB. 3. Linbar 1 Estate monitor the diesel consumption per ton FFB produce. The data was monitored for 5 years. As FY July 2019-June 2020, diesel consumption per ton FFB was recorded at 6.9177. As to date FY July 2020 – June 2021 the diesel 	Complied

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		consumption recorded at 6.8491/ton FFB.	
		4. Linbar 2 Estate monitor the diesel consumption per ton FFB produce. The data was monitored for 5 years. As FY July 2019-June 2020, diesel consumption per ton FFB was recorded at 12.563. As todated FY July 2020 – June 2021 the diesel consumption recorded at 20.924/ton FFB.	
Criterion 7.10			
Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	The GHG emissions for FY 2019/20 was verified through Palm GHG Calculator version 4. Source of the emissions were mainly due to fossil fuel consumption, POME treatment and consumption of fertilizer. Based on the verification of records, all the sampled issuance was traceable.	Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	Not applicable since no new development by the certification unit.	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH4) emission through POME treatment. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions. Among the plans to minimize the pollutants were ensuring efficiency of the effluent treatment plant and maximizing the application of EFB therefore dependency to inorganic fertilizers can be reduced.	Complied
Criterion 7.11			

Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>IOI group has established Zero Burning Policy as per 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, EQA 1974 specifically on section 29A (prohibition on Open Burning) and 29AA (Exclusion from 'Open Burning') signed by the Plantation Director on May 2018. The policy was communicated to all the employee through training, briefing and signage at several notice board in the estate.</p> <p>IOI group has established Group Standard Operating Procedure (StOP) for Land Clearing, index 4.1 and Group Standard Operating Procedure (StOP) for Land Preparation for New Planting and Replanting, index 4.2 prepared on September 2007. All felled palm will be shredded or chip and piled between planting rows.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>IOI group has established IOI Group Fire Management Guidelines. Refer document no. 101/G/EV/012, revision 0, issued on 08/01/2021 signed by the Plantation Director.</p> <p>The IOI Group IOI Group Fire Management Guidelines was categorized into 3 stages:</p> <ul style="list-style-type: none"> • Stage 1: Prevention and Monitoring • Stage 2: Emergency Response • Stage 3: Post-Fire Analysis & Programs <p>The operating units subscribed the NASA Fire Information Resource Management System (FIRMS) to monitor the fire incident occurrence in the estate and surrounding areas.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The estates visited engagement with the adjacent stakeholders during stakeholders' consultation meeting. Reviewed the latest stakeholders meeting was conducted as follows:</p> <ol style="list-style-type: none"> 1. Sakilan Estate:17/08/2020 	Non-compliance

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		<p>2. Linbar 1 Estate and Linbar 2 Estate: 18/09/2020</p> <p>In the meeting, the estate brief the stakeholders on the IOI group policies, environmental and social issue.</p> <p>However, there is no evidence of the operating units' engagement on fire prevention and control measures with the adjacent stakeholders.</p>										
<p>Criterion 7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>												
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since there is no land clearing after November 2005.</p>	<p>Not Applicable</p>									
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2b Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>Internal HCV Assessment was done in 2015 and report was prepared on 20/11/2018 covering all the operating units under Sakilan CU. The report includes the Management Action Plans is annually reviewed and last review was on 01/11/2020. Among the HCV Identified as follows:</p> <table border="1" data-bbox="1137 1141 1883 1361"> <thead> <tr> <th>Estate</th> <th>Internal HCV</th> <th>External HCV</th> </tr> </thead> <tbody> <tr> <td>Sakilan Estate</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Linbar 1 Estate</td> <td>7.25 ha Riparian Reserve for Sg. Lokan</td> <td>54,000.00 ha Segaliud Lokan Forest Reserve</td> </tr> </tbody> </table>	Estate	Internal HCV	External HCV	Sakilan Estate	N/A	N/A	Linbar 1 Estate	7.25 ha Riparian Reserve for Sg. Lokan	54,000.00 ha Segaliud Lokan Forest Reserve	<p>Complied</p>
Estate	Internal HCV	External HCV										
Sakilan Estate	N/A	N/A										
Linbar 1 Estate	7.25 ha Riparian Reserve for Sg. Lokan	54,000.00 ha Segaliud Lokan Forest Reserve										

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<p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Linbar 2 Estate</p>	<p>N/A</p>	<p>54,000.00 ha Segaliud Lokan Forest Reserve</p>	<p>With regards to the HCV & Conservation Area Management Action Plans & Continuous Improvement Plan, each of the operating unit conduct their own review.</p> <p>Generally, among the action plans established were:</p> <ul style="list-style-type: none"> • To enhance security to prevent illegal hunting • To establish/maintain riparian zone according to DID guideline • To rehabilitate the degraded riparian zone • To provide awareness and education among employees regarding HCV and conservation areas through trainings and signage's <p>The certification units has conducted HCV assessment in 2015 and as per report High Conversation Value and Conservation Area dated 20/11/2018. The report includes management Action Plans and Continuous Improvement plan. The plan was reviewed on annually basis.</p> <p>Sakilan Estate</p> <p>Latest reviewed was conducted in November 2020. No HCV identified in the estate. The estate identified HCV Management Area for riparian buffer zone for stream that flow through the estate from and to Sg. Bulu and Sg. Garinono under and established management plan for the area. Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estate conduct monitoring at the HCV area. The monitoring covers on the condition of the signboard, red and white ring marking at the palm trunk, buffer zone width, no evidence of
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		<p>chemical application and water flow. Reviewed the monitoring records dated 13/01/2021, 20/01/2021, 27/01/2021, 05/02/2021 and 10/02/2021.</p> <p>2. The estate monitored the wildlife present in the estate. The monitoring is based on sightings and footprint. Reviewed the monitoring records for the month of February 2021</p> <p>Linbar 1 Estate and Linbar 2 Estate</p> <p>Latest reviewed was conducted in November 2020.1 HCV 4 Riparian buffer zone for Sg. Lokan in Linbar 1 Estate and 1 HCV 1 which are Segaliud-Lokan (54,000 ha) forest reserves located adjacent with Linbar 1 Estate and Linbar 2 Estate have been identified.</p> <p>The estate has established management plan for HCV identified. Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estate has established 30.98 ha of Forest Reserve buffer zone along the Segaliud Lokan Forest Reserve. Signboard on prohibition of trespassing and hunting was erected at designated area along the buffer zone as sighted in P10G and P10H in Linbar 1 Estate and P16A and P16B in Linbar 2 Estate 2. Linbar 1 Estate conducted HCV area monitoring on weekly basis. Reviewed the patrolling records for field P10H, P10B, P15B, and P14C dated 09/01/2021, 19/01/2021, 15/02/2021, and 23/02/2021. Reviewed the summary of field patrolling report for the month of January 2021 dated 28/01/2021. 3. Linbar 2 Estate conducted HCV area monitoring on weekly basis. Reviewed the patrolling records dated 07/01/2021, 13/01/2021, 18/01/2021, and 11/02/2021. 	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or	No land clearing after November 2005 and no new planting and land clearing since 15 November 2018. Internal HCV Assessment was	Complied

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	<p>enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>done in 2015 and report was prepared on 20/11/2018 covering all the operating units under Sakilan CU. The report includes the Management Action Plans is annually reviewed and last review was on 01/11/2020. Among the HCV Identified as follows:</p> <table border="1" data-bbox="1137 499 1883 858"> <thead> <tr> <th>Estate</th> <th>Internal HCV</th> <th>External HCV</th> </tr> </thead> <tbody> <tr> <td>Sakilan Estate</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Linbar 1 Estate</td> <td>7.25 ha Riparian Reserve for Sg. Lokan</td> <td>54,000.00 ha Segaliud Lokan Forest Reserve</td> </tr> <tr> <td>Linbar 2 Estate</td> <td>N/A</td> <td>54,000.00 ha Segaliud Lokan Forest Reserve</td> </tr> </tbody> </table> <p>With regards to the HCV & Conservation Area Management Action Plans & Continuous Improvement Plan, each of the operating unit conduct their own review.</p> <p>Generally, among the action plans established were:</p> <ul style="list-style-type: none"> • To enhance security to prevent illegal hunting • To establish/maintain riparian zone according to DID guideline • To rehabilitate the degraded riparian zone • To provide awareness and education among employees regarding HCV and conservation areas through trainings and signage's <p>The certification units has conducted HCV assessment in 2015 and as per report High Conversation Value and Conservation Area dated 20/11/2018. The report includes management Action Plans and</p>	Estate	Internal HCV	External HCV	Sakilan Estate	N/A	N/A	Linbar 1 Estate	7.25 ha Riparian Reserve for Sg. Lokan	54,000.00 ha Segaliud Lokan Forest Reserve	Linbar 2 Estate	N/A	54,000.00 ha Segaliud Lokan Forest Reserve	
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		Continuous Improvement plan. The plan was reviewed on annually basis.													
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	<p>Internal HCV Assessment was done in 2015 and report was prepared on 20/11/2018 covering all the operating units under Sakilan CU. This assessment already included right of local communities for HCV as per below area:-</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Internal HCV</th> <th>External HCV</th> </tr> </thead> <tbody> <tr> <td>Sakilan Estate</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Linbar 1 Estate</td> <td>7.25 ha Riparian Reserve for Sg. Lokan</td> <td>54,000.00 ha Segaliud Lokan Forest Reserve</td> </tr> <tr> <td>Linbar 2 Estate</td> <td>N/A</td> <td>54,000.00 ha Segaliud Lokan Forest Reserve</td> </tr> </tbody> </table> <p>No issue raised during the assessment been done verified as per stakeholder interview.</p>	Estate	Internal HCV	External HCV	Sakilan Estate	N/A	N/A	Linbar 1 Estate	7.25 ha Riparian Reserve for Sg. Lokan	54,000.00 ha Segaliud Lokan Forest Reserve	Linbar 2 Estate	N/A	54,000.00 ha Segaliud Lokan Forest Reserve	Complied
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Linbar 2 Estate	N/A	54,000.00 ha Segaliud Lokan Forest Reserve													
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	<p>Among RTE species identified in the external HCV 1 Segaluid Lokan Forest Reserve, adjacent with Linbar 1 Estate and Linbar 2 Estate which protected under Protection of wildlife Act 1972 (Act 76), Sabah Wildlife Conservation and Enactment 1997 and IUCN Re List 2008 such as elephant, long tail macau, white beaked hornbills, eagles, pangolin and other wildlife animals as reported in High Conversation Value and Conservation Area dated 20/11/2018 reviewed in November 2020.</p> <p>IOI Group in collaboration with Sabah Wildlife Department has appointed personnel as Honorary Wildlife Warden as per</p>	Complied												

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		<p>appointment letter by Director of Sabah Wildlife Department. Refer letter JHL.600-0/23/1 Jld.4 (269).</p> <p>Education programmes such as training/briefing and signages were given to the workforce. Records of trainings were maintained by the operating units for verification.</p> <p>Sakilan Estate</p> <p>The estate monitored the wildlife present in the estate. The monitoring is based on sightings and footprint. Reviewed the monitoring records for the month of February 2021.</p> <p>Linbar 1 Estate</p> <p>The estate monitored the wildlife present in the estate. Reviewed the summary of field patrolling report for the month of January 2021 dated 28/01/2021.</p> <p>Linbar 2 Estate</p> <p>The estate conducted animal monitoring once a month by appointed Wildlife Warden. Reviewed the records of patrolling dated 02/02/2021 and 12/03/2021. There is evidence of elephant encroachment sighted during the records. Communications wildlife was made by the Wildlife Warden.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>No new planting and land clearing since 15 November 2018. IOI Group in collaboration with Sabah Wildlife Department has appointed personnel as Honorary Wildlife Warden as per Government Gazette no. 49: KPKAS: 500-14/2KII.2 (120) dated 07/03/2019.</p> <p>The estate monitored the wildlife present in the estate. The monitoring is based on sightings and footprint.</p> <p>The estate conducted HCV monitoring on weekly basis. Reviewed the monitoring records FY 2020.</p>	Complied

7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Sakilan POM certification unit.</p>	<p>Complied</p>
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Appendix B: Approved Time Bound Plan (31th December 2020)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakon, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	ASA-04 audit completed in July 2020	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2020	ASA-01: 30 % remote audit completed in November 2020. Remaining 70% onsite audit will be conducted in January 2021.	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Apr 2020	ASA-01 audit completed in November 2020	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, and Jasin Lalang	Aug 2009	Re-Certified in Oct 2020	Recertification audit completed in July 2020	No outstanding issues
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2020	Recertification audit completed in August 2020	No outstanding issues

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	Recertification audit completed in September 2020	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	Recertification audit completed in August 2020	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, Leepang 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Re-certified in December 2018	ASA-02 audit completed in September 2020	No outstanding issues.
10.	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Re-certified in Mar 2018	ASA-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	Sept 2013	Re-certified in December 2018	ASA-02: 30 % remote audit completed in	No outstanding issues

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		2, Leepang 3, and Leepang 4			November 2020. Remaining 70% onsite audit will be conducted in January 2021.	
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 (Outgrowers & Smallholders)	Planned - 2018	Certified in July 2018	ASA-02 audit completed in July 2020.	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)	<p>Progress on Stage 2: Community Participatory Mapping</p> <p>Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping, started in August 2019. Technical assistance to the affected communities is being provided by CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point, the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.</p> <p>On 12 June 2020, CICOM resumed the Community Participatory Mapping process. Two of the remaining three communities yet to be mapped, Long Jegan and Long Teran Batu, had some reservations about their participation in the Community Participatory Mapping. To address their concerns, a team consisting of the State of Sarawak’s Ministry of Modernization of Agriculture, Native Land and Regional Development (MANRED), Land Custody and Development Authority (LCDA), District Office of Beluru, and IOI visited the two communities on July 20-21. As a result, Long Jegan and Long Teran Batu decided to</p>

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						<p>participate in the mapping exercise. The mapping of these two villages was completed on 29 July 2020.</p> <p>On 21 July 2020, the Penans of Long Lapok, which is another local community living outside the Provisional Lease area, submitted to IOI a request to include them in the Resolution Process. CICOM will, therefore, include this community in the mapping exercise to understand their land claims better. This will inevitably delay further the completion of the Community Participatory Mapping.</p> <p>CICOM managed to complete the initial mapping exercise in line with the deadline of 31 July 2020. However, when CICOM proceeded to socialization and verification of the maps with the affected communities, a group of 48 LTKA farmers suddenly came up with new land claims, which required CICOM to conduct further land surveys and thus delayed the process of the Community Participatory Mapping.</p> <p>On August 7th, the Berawan of Long Jegan sent a letter to the RSPO expressing their dissatisfaction with IOI Pelita and CICOM helping other communities with mapping their land claims without consultation with the leaders of Long Jegan who claim the entire area. IOI Pelita and the representatives of the State of Sarawak Government met on October 5th and obtained Long Jegan’s consent to continue their participation in the mapping process and delay the addressing of the overlapping land claims till the next stage of the resolution process, that is till Stage 3 – Negotiations for Final Dispute Settlement. The local authorities made it also clear that the intercommunal land disputes between various communities are beyond the control or authority of IOI Pelita and instead should be directed to their District Officer. During the meeting the elders of Long Jegan asked IOI Pelita and CICOM for help with additional mapping exercises. This will unfortunately further delay the completion of Stage 2 (Community Participatory Mapping). CICOM completed the Community Participatory Mapping and Stage 2 of the Resolution Process on 7 November 2020.</p> <p>Stage 3: Negotiations for Final Settlement</p> <p>Stage 3 is expected to start as early as 1 December 2020 providing that Covid-19-related movement restrictions are lifted. In the meantime, the communities will be able to prepare themselves for the negotiations and obtain any additional assistance they might need from CICOM.</p>

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						<p>The screenshot displays the RSPO Complaint System interface. At the top, it identifies the Respondent as IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad) and the Complainant as Local Community of Long Teran Kanan & NGO (Grassroots). A progress bar indicates the status of the complaint. Below this, a 'COMPLAINT BACKGROUND' table provides the following details:</p> <table border="1"> <tr><td>Complaint Reference</td><td>N/A</td></tr> <tr><td>Status</td><td>Investigation</td></tr> <tr><td>Respondent</td><td>IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)</td></tr> <tr><td>Complainant</td><td>Local Community of Long Teran Kanan & NGO (Grassroots)</td></tr> <tr><td>Date Complaints Submitted</td><td>15 Mar 2010</td></tr> <tr><td>Date Complaints Accepted</td><td>N/A</td></tr> <tr><td>Membership Sector</td><td>Processors and / or Traders</td></tr> <tr><td>Location of Complaint</td><td>Malaysia</td></tr> <tr><td>Region / District / Province</td><td>Miri, Sarawak</td></tr> <tr><td>Summary of the Complaint</td><td>Synopsis Land conflict IOI Group's certification process for new certifications suspended in 1/4/11. Both parties have agreed for mediation. Mediator has been engaged through the RSPO Dispute Settlement Facility. Mediation process Stage 1 began in September 2011 and is ongoing (note: Stage 1 is about Conflict assessment and Agreement to Participate in a Mediation. This stage would map the dispute through identifying the parties who should participate in the mediation and establish a primary agenda of issues that require resolution. It would also seek the commitment of the key parties to enter into a mediation, and establish their agreement to the mediation team). Updates of this case can be found in DSF list of disputes.</td></tr> </table>	Complaint Reference	N/A	Status	Investigation	Respondent	IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)	Complainant	Local Community of Long Teran Kanan & NGO (Grassroots)	Date Complaints Submitted	15 Mar 2010	Date Complaints Accepted	N/A	Membership Sector	Processors and / or Traders	Location of Complaint	Malaysia	Region / District / Province	Miri, Sarawak	Summary of the Complaint	Synopsis Land conflict IOI Group's certification process for new certifications suspended in 1/4/11. Both parties have agreed for mediation. Mediator has been engaged through the RSPO Dispute Settlement Facility. Mediation process Stage 1 began in September 2011 and is ongoing (note: Stage 1 is about Conflict assessment and Agreement to Participate in a Mediation. This stage would map the dispute through identifying the parties who should participate in the mediation and establish a primary agenda of issues that require resolution. It would also seek the commitment of the key parties to enter into a mediation, and establish their agreement to the mediation team). Updates of this case can be found in DSF list of disputes .
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16.	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned - 2021	Uncertified Unit	RSPO Stage 1 was conducted in September 2019.	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p>

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19.	PT KPAM, Indonesia	Under Development	Planned - 2023	Uncertified Unit	NPP and HCSA was approved in April 2018. Currently under development.	<p>RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:</p>  <p>https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?</p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:</p> <p>http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf</p>

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Sakilan** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Sakilan** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.92
PKO	0

Extraction	%
OER	22.12
KER	4.36

Production	t/yr
FFB Process	122,119.64
CPO Produced	27014.64
PKO Produced	5324.791

Land Use	Ha
OP Planted Area	6,342.00
OP Planted on peat	0
Conservation (forested)	48.59
Conservation (non-forested)	46.24
Total	

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	58291.86	0.48	0	0	0	0	58,291.86	0.48
CO ₂ Emission from fertilizer	14,072.44	0.12	0	0	0	0	14,072.44	0.12
NO ₂ Emission	12,372.14	0.10	0	0	0	0	12,372.14	0.10
Fuel Consumption	1,480.44	0.01	0	0	0	0	1,480.44	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-55,252.95	-0.45	0	0	0	0	-55,252.95	-0.45
Conservation Sequestration	-445.57	-0.00	0	0	0	0	-445.57	-0.00

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Total	30,518.36	0.25	0	0	0	0	30,518.36	0.25
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0	0
Fuel Consumption	1,911.66	0.02
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	-2,563.57	-0.02
Sales of EFB	0	0
Total	-651.91	-0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	November 2019	10,219.19	0	10,219.19
2	December 2019	9,054.88	0	9,054.88
3	January 2020	7,139.28	0	7,139.28
4	February 2020	3,640.77	0	3,640.77
5	March 2020	7,854.97	0	7,854.97
6	April 2020	11,150.03	0	11,150.03
7	May 2020	11,411.78	0	11,411.78
8	June 2020	12,173.07	0	12,173.07
9	July 2020	11,089.51	0	11,089.51
10	August 2020	9,178.63	0	9,178.63
11	September 2020	12,399.98	0	12,399.98
12	October 2020	10,824.97	0	10,824.97
13	November 2020	7,246.68	0	7,246.68
14	December 2020	6,976.72	0	6,976.72
15	January 2021	6,004.00	0	6,004.00
16	February 2021	2,340.88	0	2,340.88
	Total	138,705.34	0	138,705.34
Note: Nil				

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	November 2019	2,252.34	420.70
2	December 2019	1,886.92	342.18
3	January 2020	1,483.66	293.56
4	February 2020	801.48	168.22
5	March 2020	1,786.874	346.270
6	April 2020	2,526.644	514.432
7	May 2020	2,591.619	523.460
8	June 2020	2,415.210	514.492
9	July 2020	2,264.034	439.703
10	August 2020	2,013.273	368.550

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11	September 2020	2,837.305	598.037
12	October 2020	2,471.947	510.962
13	November 2020	1,617.495	282.317
14	December 2020	1,558.317	249.875
15	January 2021	1,222.542	229.490
16	February 2021	494.850	91.512
	Total	30,224.51	5,893.76
Note: Nil			

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	IOI Commodity Trading Sdn Bhd	TR-004c59f4-3f98 TR-f34b1149-2170 TR-a6e8da9b-a4ab	4358.63	
2	IOI Commodity Trading Sdn Bhd	TR-14aa4010-5620	1661.96	
3	IOI Commodity Trading Sdn Bhd	TR-58a7495d-21ad TR-f9acab8c-3255 TR-19ae3e99-d3a3 4TR-d2cc9af7-be07	3429.03	
4	IOI Commodity Trading Sdn Bhd	TR-e8c9f8cf-5aa2 TR-a6185cd3-f5c9 TR-3381eb9d-81cb TR-b248d65f-1def TR-a85f27c4-db10	4830.94	
5	IOI Commodity Trading Sdn Bhd	TR-9aff2e02-28da TR-9253b1bc-d779 TR-b124b5ab-ceda	1180.76	
6	IOI Commodity Trading Sdn Bhd	TR-7825afd3-4793 TR-21e7571b-d866 TR-f4688895-4c62	5143.83	
7	IOI Commodity Trading Sdn Bhd	TR-7825afd3-4793 TR-21e7571b-d866 TR-f4688895-4c62	215.69	
8	IOI Commodity Trading Sdn Bhd	TR-94712301-f818 TR-ae4c3418-9acd TR-c929a58f-1e56 TR-27c3c32a-80f4	2793.92	

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		TR-f2bc84c4-be4c		
9	IOI Commodity Trading Sdn Bhd	TR-fe421a7e-c3c9 TR-37541f48-8fcd	597.4	
10	IOI Commodity Trading Sdn Bhd	TR-0787c8d1-a8fc	1,472.02	
11	IOI Commodity Trading Sdn Bhd	TR-10d2497a-621a	302.16	
12	IOI Commodity Trading Sdn Bhd	TR-3148e48e-0876 TR-621288b7-fa12 TR-9a5c3dc6-4f49	236.52	
13	IOI Commodity Trading Sdn Bhd	TR-77b23d99-2863 TR-7e6511b4-aded	1,278.28	
14	IOI Commodity Trading Sdn Bhd	TR-988c26b7-437a TR-ce45aae6-555f		1018.31
15	IOI Commodity Trading Sdn Bhd	TR-692c2c09-abf1		362.59
16	IOI Commodity Trading Sdn Bhd	TR-05cc0e5c-5034 TR-71f9380c-f3ab TR-e3e6a7fc-558e		793.1
17	IOI Commodity Trading Sdn Bhd	TR-63262668-85be		358.63
18	IOI Commodity Trading Sdn Bhd	TR-60fd8c68-3c82		578.72
19	IOI Commodity Trading Sdn Bhd	TR-7e734953-83e0		506.66
20	IOI Commodity Trading Sdn Bhd	TR-287bc0c3-8310		343.62
21	IOI Commodity Trading Sdn Bhd	TR-76b66be3-6ebc		494.76
22	IOI Commodity Trading Sdn Bhd	TR-5a99ea01-83be		509.13
23	IOI Commodity Trading Sdn Bhd	TR-1f5fa1cc-fe00		284.21
24	IOI Commodity Trading Sdn Bhd	TR-871d444d-ddb2		291.70
25	IOI Commodity Trading Sdn Bhd	TR-c4cde5db-4d19 TR-4b4ecab9-f6be		352.37
Note: Nil				

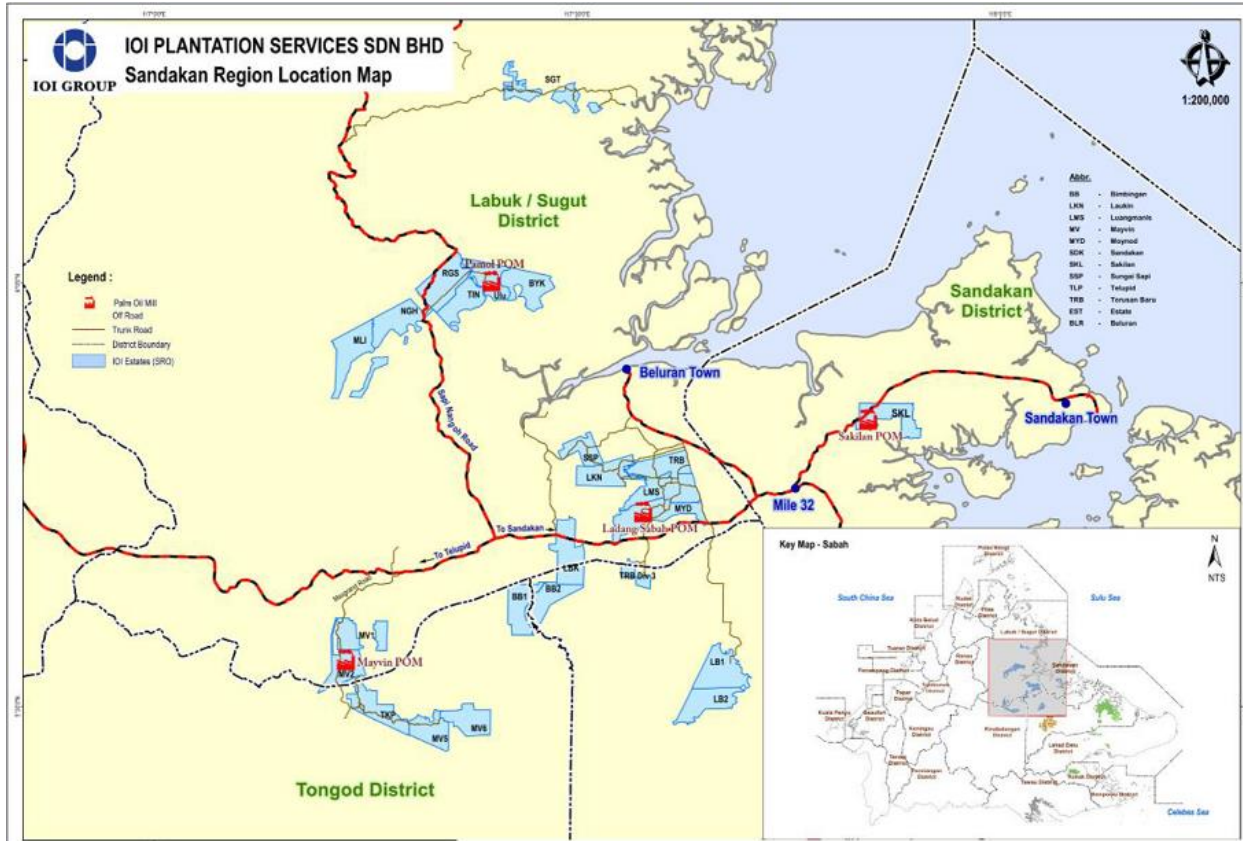
D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			
Note: Nil				

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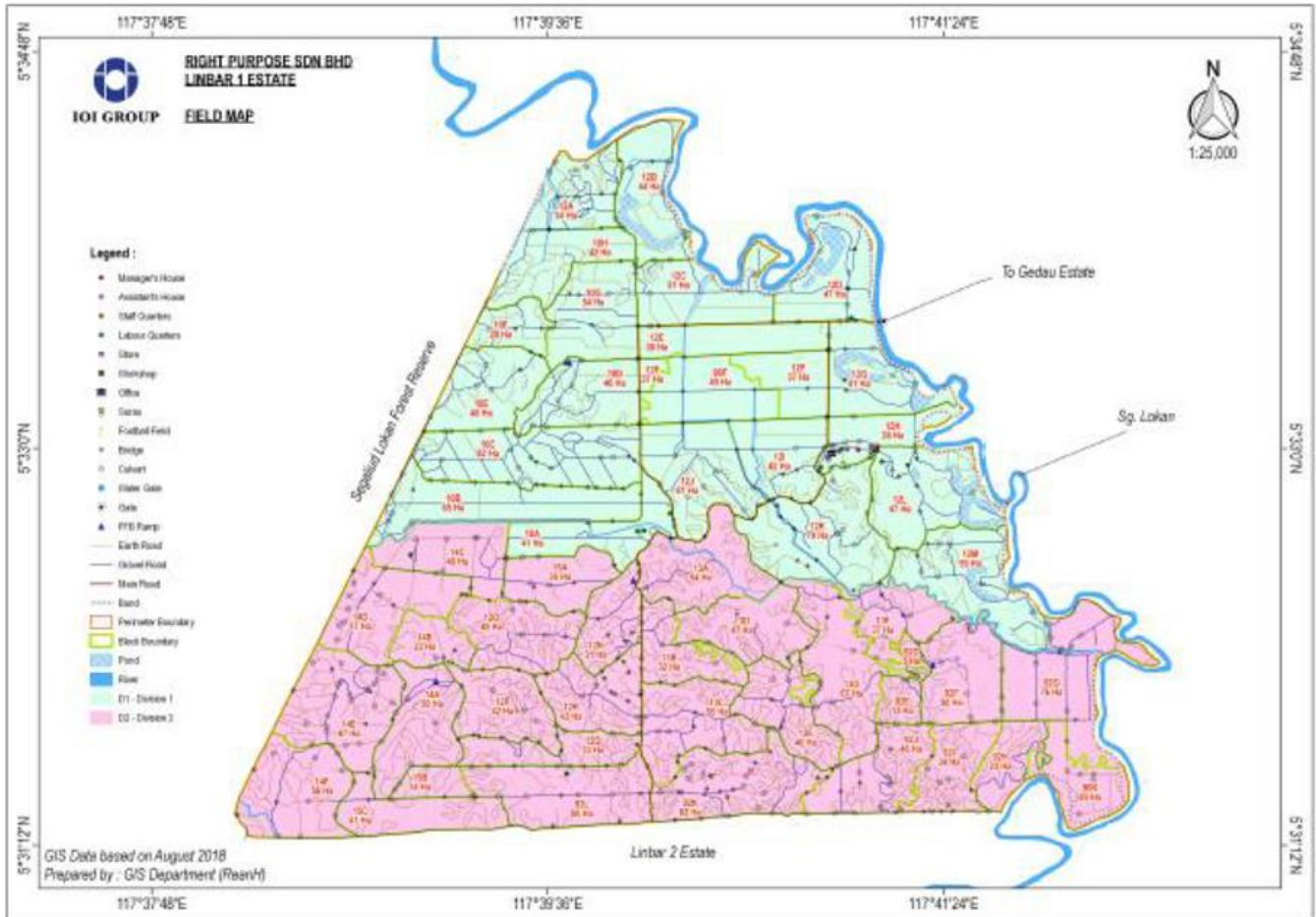
E. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Nil		
Note: Nil			

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

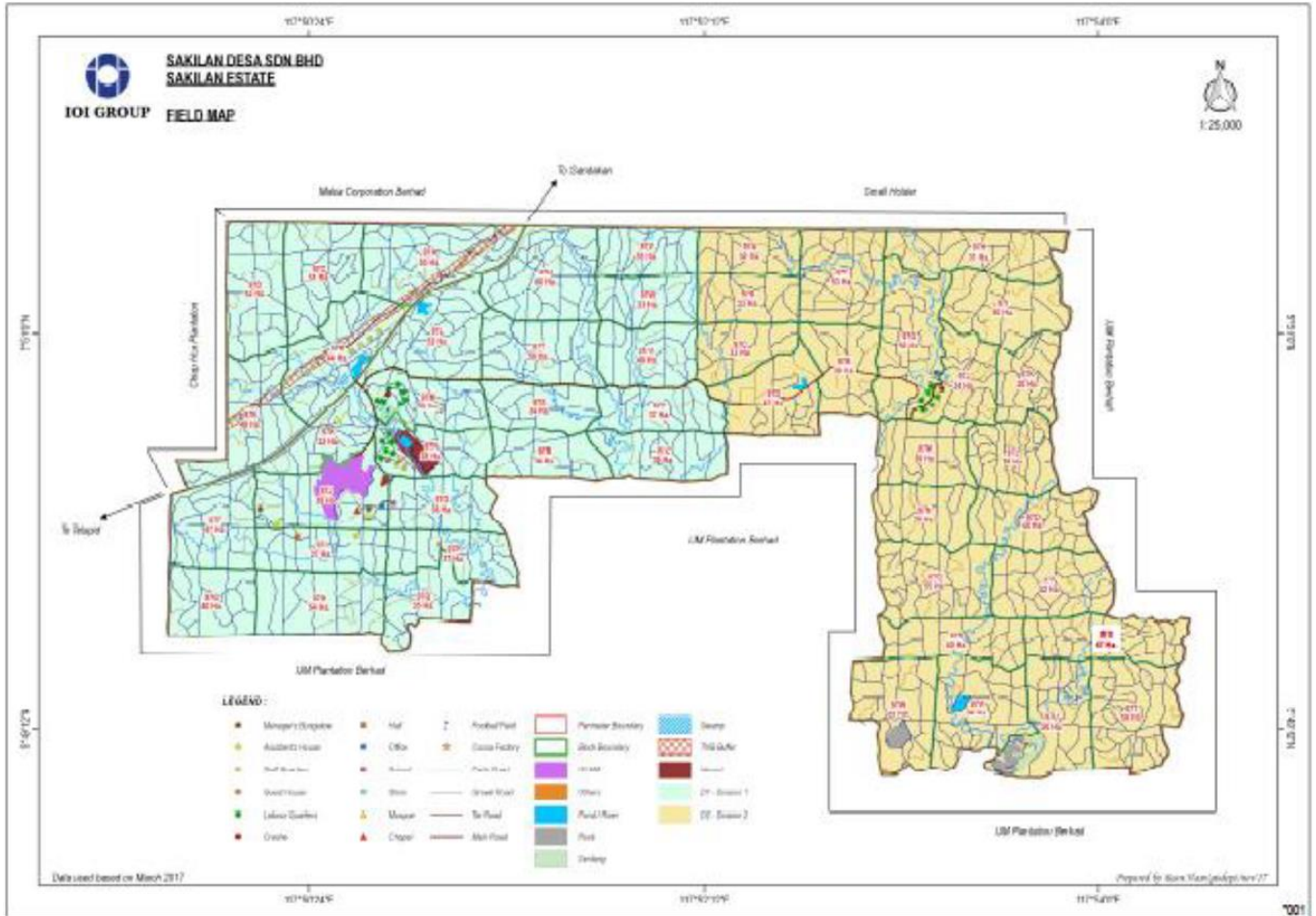


Appendix F:
 Linbar 1 estate

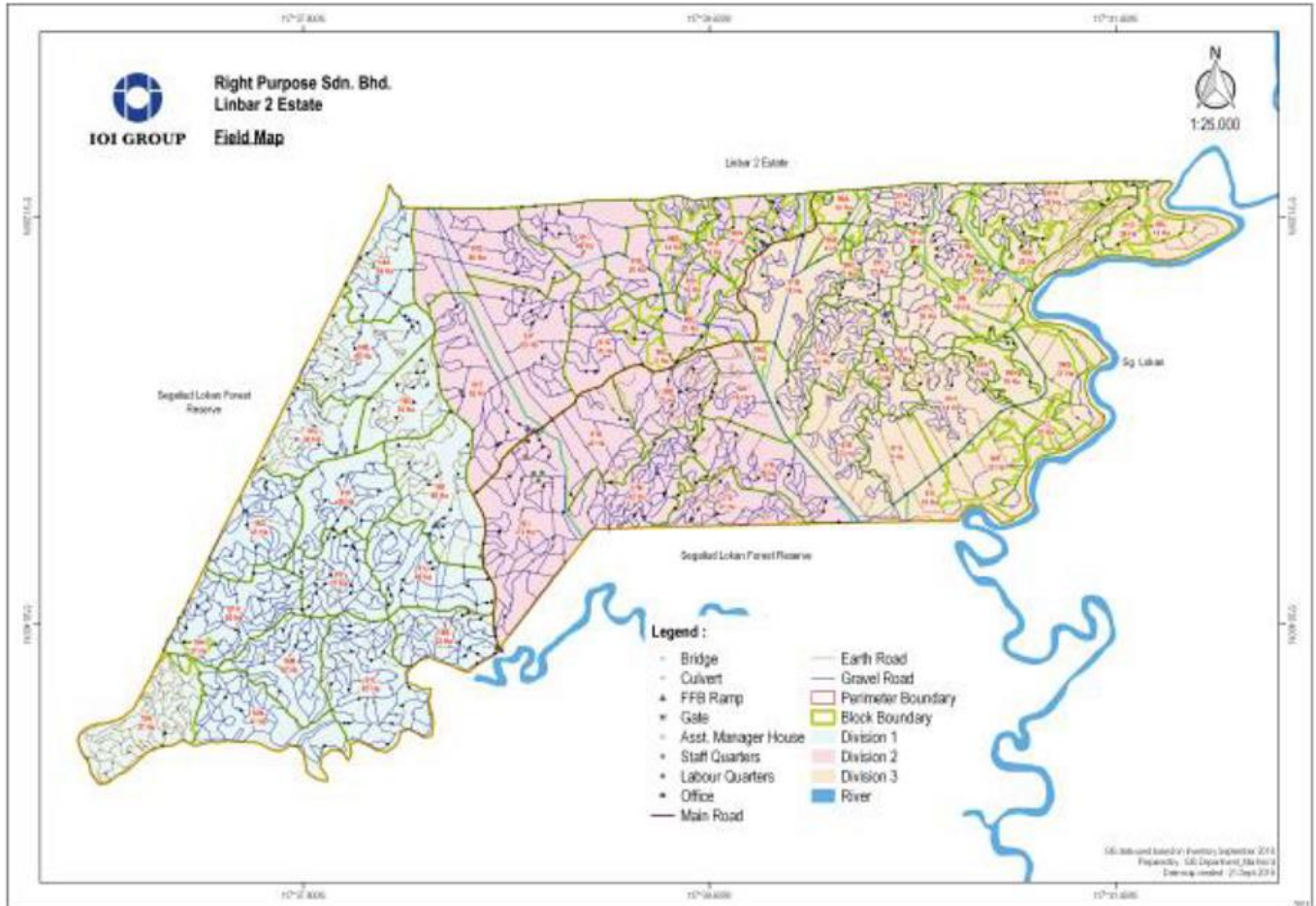


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Sakilan Estate



Linbar 2 estate



Appendix G: List of Smallholder Sampled

Not Applicable because no smallholder scheme in Sakilan certification unit.

Appendix H: List of Abbreviations

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