

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: IOI Corporation Berhad
Client Company / Parent Company Address: IOI City Tower 2, Lebuhr IRC, IOI Resort City 62502 Putrajaya, Malaysia.
Certification Unit: Pamol Plantations Sdn Bhd - Pamol Kluang Palm Oil Mill
Location of Certification Unit: 8½ Mile, Mersing Road, Kluang, 86007 Johor, Malaysia.
Date of Final Report: 22/02/2024

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Section 1: Scope of the 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)	Pamol Plantations Sdn Bhd - Pamol Kluang Palm Oil Mill		
Location / Address	8½ Mile, Mersing Road, Kluang, 86007 Johor, Malaysia.		
Website	www.ioigroup.com		
Management Representative	William Siow Kar Dat (Senior Sustainability Manager, Corporate Sustainability, IOI HQ)	E-mail	william.siow@ioigroup.com
Telephone	+603-89478888 (Head Office)	Facsimile	+603-89432266 (Head Office)

2. Certification Information			
Certificate Number	RSPO 547027	Certificate Start Date	16/03/2020
Date of First Certification	16/03/2010	Certificate Expiry Date	15/03/2025
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory, and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 700802	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (M) Sdn Bhd	30/12/2024
MSPO 700801	MSPO 2530-4:2013 General Principles for Palm Oil Mills		30/12/2024
MSPO 720913	MSPO Supply Chain Certification Standard 2018		22/12/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Pamol Kluang POM	8 1/2 Miles, Mersing Road , 86007 Kluang, Johor.	2°06'39.49" N	103°23'32.25" E
Pamol Timur Estate	Pamol Timur Estate , Jalan Kluang – Mersing, 86000 Kluang, Johor Kluang, Johor.	2°06'43.01" N	103°23'08.03" E
Pamol Timur Organic Oil	Pamol Timur Estate , Jalan Kluang – Mersing, 86000 Kluang, Johor Kluang, Johor.	2°06'43.1" N	103°23'08.3" E
Pamol Barat Estate	Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor.	2°06'46.09" N	103°20'38.00" E
Pamol Barat Organic Oil	Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor.	2°06'46.9" N	103°20'38.0" E
Mamor Estate	Mamor Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor.	2°08'43.01" N	103°18'21.05" E
Unijaya Estate	Unijaya Estate, Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 8609 Kluang, Johor.	1°56'26.01" N	103°16'41.05" E
Kahang Estate	Kahang Estate, Peti Surat 14, 86700 Kahang, Johor.	2°19'55.73" N	103°29'51.83" E
Swee Lam Estate	Swee Lam Estate, K.B.107, 81000 Kulai, Johor.	1°40'29.00" N	103°39'13.06" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pamol Timur Estate	^(a) 1,656.00	^(b) 5.41	^(c) 195.14	^(d) 1,856.55	89.20
Pamol Timur Organic Oil	440.00	0.07	0.00	440.07	99.98

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Pamol Barat Estate	^(e) 1,436.00	^(f) 1.14	^(g) 177.19	^(h) 1,614.33	88.95
Pamol Barat Organic Oil	688.00	1.14	0	689.14	99.83
Mamor Estate	⁽ⁱ⁾ 2,074.00	^(j) 44.26	^(k) 107.21	2,225.47	93.19
Unijaya Estate	1,160.00	^(l) 1.16	^(m) 99.48	1,260.64	92.02
Kahang Estate	2,278.00	⁽ⁿ⁾ 5.78	136.12	2,419.90	94.14
Swee Lam Estate	1,098.00	^(o) 1.87	^(p) 61.09	1,160.96	94.58
Total	10,830.00	60.83	776.23	11,667.06	

Note: Remarks on changes

Pamol Timur Estate

^(a)Reduction of 2ha planted hectare due to development of extension of Palm Oil Mill area and 440ha allocated for Pamol Timur Organic Oils.

^(b) 0.07ha of HCV situated in Pamol Timur Organic Oils hectareage. Reduction of 1.30 Ha as it is classified as conservation area.

^(c) Increase of 3.81 of Infrastructure & other due to construction of road to the new palm oil mill area and additional of 1.30 ha conservation area

^(d) Adjustment and remapping was made by GIS Department in October 2023

Pamol Barat Estate

^(e) Reduction of 688ha as it was allocated into Pamol Barat Organic Oils.

^(f) HCV Reduction of 1.14 ha situated in Pamol Barat Organic Oils. Variance of 4.95Ha as conservation was removed.

^(g) Reduction of 1.90 ha of Infrastructure & other due to development of TNB station

^(h) Adjustment and remapping was made by GIS Department in October 2023

Mamor Estate

⁽ⁱ⁾Increase of 1 ha planted area due to realignment based on UAV Imagery reported on 1st July 2023. There is no new planting at that area.

^(j) Decrease of 4.10 ha of HCV area as it is classified as conservation area (Unplanted Area).

^(k)Increase 3.10 ha infrastructure and others due to additional of conservation hectareage (Unplanted Area).

Unijaya Estate

^(l) Decrease of 0.31ha HCV area as it is classified as conservation area (Unplanted Area).

^(m) Increase of 0.31ha infrastructure and other due to addition of conservation area hectareage (Unplanted Area).

Kahang Estate

⁽ⁿ⁾ Increase 1.47 ha of HCV area due to demarcation of river riparian boundary zone shown in UAV Imagery by GIS.

Swee Lam Estate

^(o) Reduce 0.29 ha as it is classified as conservation area (Unplanted Area).

^(p) Increase 0.29ha of infrastructure and others due to addition of conservation area (Unplanted Area).

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pamol Timur Estate	25.00	1,215.00	416.00	0.00	1,631.00	25.00
Pamol Timur Organic Oils	0.00	440.00	0.00	0.00	440.00	0.00
Pamol Barat Estate	0.00	1,436.00	0.00	0.00	1,436.00	0.00
Pamol Barat Organic Oils	0.00	688.00	0.00	0.00	688.00	0.00

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Mamor Estate	538.00	97.00	1439.00	0.00	1,536.00	538.00
Unijaya Estate	175.00	696.00	289.00	0.00	985.00	175.00
Kahang Estate	0.00	364.00	1914.00	0.00	2,278.00	0.00
Swee Lam Estate	0.00	169.00	432.00	497.00	1,098.00	0.00
Total (ha)	738.00	5,105.00	4,490.00	497.00	10,092.00	738.00

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2023 – Feb 2024)	Actual (Nov 2022 – Oct 2023)		Forecast (Mar 2024 – Feb 2025)
		Previous license period (Nov 2022 – Feb 2023)	Current license period (Mar 2023 – Oct 2023)	
Pamol Timur Estate	49,105.00	11,522.99	25,446.89	39,076.00
Pamol Timur Organic Oil		417.71	7,270.52	11,137.50
Pamol Barat Estate	46,897.00	9,752.94	20,830.34	32,255.00
Pamol Barat Organic Oil		649.28	11,525.73	17,270.00
Mamor Estate	42,493.00	16,725.35	24,968.72	36,035.00
Unijaya Estate	24,120.00	4,794.84	12,323.74	23,760.00
Kahang Estate	64,460.00	18,587.17	30,140.87	64,500.00
Swee Lam Estate	25,450.00	5,884.04	15,040.73	28,260.00
Total	252,525.00	215,881.86		252,293.50

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2023 – Feb 2024)	Actual (Nov 2022 – Oct 2023)		Forecast (Mar 2024 – Feb 2025)
		Previous license period (Nov 2022 – Feb 2023)	Current license period (Mar 2023 – Oct 2023)	
N/A		N/A	N/A	
Total		N/A		

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2023 – Feb 2024)	Actual (Nov 2022 – Oct 2023)		Forecast (Mar 2024 – Feb 2025)
		Previous license period (Nov 2022 – Feb 2023)	Current license period (Mar 2023 – Oct 2023)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Nov 2022	18,695.78	-	18,695.78
2	Dec 2022	20,585.34	-	20,585.34
3	Jan 2023	14,260.26	-	14,260.26
4	Feb 2023	14,792.94	-	14,792.94
5	Mar 2023	13,069.41	-	13,069.41
6	Apr 2023	10,450.87	-	10,450.87
7	May 2023	15,753.98	-	15,753.98
8	June 2023	18,054.25	-	18,054.25
9	July 2023	19,398.47	-	19,398.47
10	Aug 2023	22,326.17	-	22,326.17
11	Sept 2023	23,238.96	-	23,238.96
12	Oct 2023	25,255.43	-	25,255.43
TOTAL		215,881.86	-	215,881.86

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Mar 2023 – Feb 2024)	Actual (Nov 2022 – Oct 2023)		Forecast (Mar 2024 – Feb 2025)
	Previous license period (Nov 2022 – Feb 2023)	Current license period (Mar 2023 – Oct 2023)	
FFB	FFB		FFB
252,525.00 mt	68,334.30 mt	147,547.50 mt	252,293.50 mt
	Total:	215,881.86 mt	
CPO (OER: 22.22 %)	CPO (OER: 22.13 %)		CPO (OER: 22.32 %)
56,103.89 mt	15,122.38 mt	32,652.26 mt	56,312.02 mt

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	Total:	47,774.64 mt		
PK (KER: 5.25 %)	PK (KER: 4.63 %)		PK (KER: 5.25 %)	
13,266.00 mt	3,163.88 mt	6,831.45 mt	13,245.44 mt	
	Total:	9,995.33 mt		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Nov 2022	3,850.31	838.24
2	Dec 2022	4,364.91	986.75
3	Jan 2023	3,133.82	836.41
4	Feb 2023	3,008.06	928.54
5	Mar 2023	2,755.10	504.34
6	Apr 2023	2,320.72	542.93
7	May 2023	3,627.07	782.92
8	June 2023	4,163.20	651.00
9	July 2023	4,330.78	1,042.37
10	Aug 2023	5,057.32	662.48
11	Sept 2023	5,349.97	911.01
12	Oct 2023	5,811.01	965.85
TOTAL		47,772.27	9,652.84

11. Summary of Actual Volume sold					
Current License period (Mar 2023 – Oct 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	26,140.84	-	-	-	26,140.84
PK (MT)	5,547.65	-	-	-	5,547.65
Credits	-	-	-	-	-
Previous License period (Nov 2022 – Feb 2023)					
CPO (MT)	13,334.94	-	-	-	13,334.94
PK (MT)	3,107.56	-	-	-	3,107.56
Credits	-	-	-	-	-

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11A. 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	Buyer A	XXXXXXXX	39,475.78	8,655.21
TOTAL			39,475.78	8,655.21

Note: Data is consolidated, and each transaction were verified against PalmTrace

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	N/A	N/A	N/A
TOTAL		N/A	N/A

11D. 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
1	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

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12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A			

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 **27/11/2023 – 02/12/2023**. The audit programme is included as Section 2.3.

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 Critical NC close out on-site assessment was conducted on **01/02/2024**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

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This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer 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 (Re- Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Pamol Kluang POM	√	√	√	√	√
Pamol Timur Estate		√		√	
Pamol Timur Organic Oil					√
Pamol Barat Estate	√			√	
Pamol Barat Organic Oil					√
Mamor Estate			√		√
Unijaya Estate		√		√	
Kahang Estate			√		
Swee Lam Estate	√			√	√

Tentative Date of Next Visit: November 27, 2024 - December 2, 2024

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nor Halis Abu Zar (NHAZ)	Team Leader	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma In Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: 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. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for RSPO P&C 2018 MYNI 2019 and MS2530:2013. He mainly covered for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia and International Level.</p> <p>Training attended:</p>

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		<p>He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021 and August 2023, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<p>Mohamad Amirul Saifullah bin Mohamad Senan (MAS)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Agricultural Science from Universiti Putra Malaysia.</p> <p>Work Experience: With over 6 years of experience in oil palm plantation operations, agriculture, safety, and health-related fields, he has been an integral part of a large publicly listed plantation organization since 2012. His job responsibilities include supervising and monitoring estate operations to ensure compliance with RSPO, ISCC, and MSPO requirements and regulations, Good Agricultural Practice, and other standard operating procedures. He has also actively participated in internal audits of plantation operations to ensure adherence to RSPO, ISCC, and MSPO requirements.</p> <p>Subsequently, he spent 6 years working with an international Certification Body (CB), conducting certification audits of plantation operations for compliance with RSPO, MSPO, and ISCC requirements. He is a qualified Lead Auditor for RSPO P&C, RSPO Supply Chain, ISCC, MSPO OPMC, and MSPO Supply Chain certification audits, as well as a qualified Auditor for ISO 9001:2015 certification audits. Since January 2019. he has conducted audits in various countries, including Malaysia, Indonesia, Cambodia, Thailand, Singapore, Japan, India, Germany, and Spain. His expertise extends to the Palm Oil sector, encompassing industry fundamentals such as good agricultural practices (GAP), best management practices (BMP), sustainability, social issues (e.g., worker welfare and employment terms, gender issues), occupational health and safety (OHS) matters, and environmental considerations (e.g., pollution control and resource conservation).</p> <p>Training attended: Attended, completed and passed ISO 9001:2015 Lead Auditor Course (CQI-IRCA certified), ISO 45001:2018 Lead Auditor Course (CQI-IRCA certified), RSPO P&C Lead Auditor Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Training Course (endorsed by RSPO Secretariat), RSPO P&C 2018 Version Introduction Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Update Course (endorsed by RSPO Secretariat), MSPO Lead Auditor Course (endorsed by MPOCC), MSPO Supply Chain Certification Training Course (endorsed by MPOCC), ISCC EU and PLUS Basic Training, ISCC Greenhouse Gas Training,</p>

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		<p>ISCC Waste and Residues Training, SA8000 Introduction & Basic Auditor Course, and HCV-HCSA Assessor Training Course.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Rahayu Zulkifli (RZ)	Team Member	<p>Education: Law Degree from John Moores University, Liverpool, United Kingdom</p> <p>Work Experience: She was a practicing lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana.</p> <p>Training attended: Rahayu successfully attended the RSPO-endorsed Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness Training in 2016, and RSPO-endorsed Lead Auditor Refresher course in 2018. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 & 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Dr. Suhaili Sahari	Peer Reviewer	<p>Education:</p> <p>Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p> <p>Work Experience:</p> <p>Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and</p>

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		<p>implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. ASI reviewer training 3. Safety and Health 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4 7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard : Global GAP, Euro GAP
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Accompanying Persons:

Name	Role
Not Applicable	

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	NHAZ	MAS	RZ
Sunday 26/11/2023	PM	Audit Team Travel from Kuala Lumpur to Kluang	√	√	√
Monday, 27/11/2023 Mamor Estate	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Lead Auditor • Confirmation of assessment scope and finalize Audit plan 	√	√	√
	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	12.30 – 13.30	Lunch	√	√	√

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Date	Time	Subjects	NHAZ	MAS	RZ
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Tuesday, 28/11/2023	08.30 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
Swee Lam Estate	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Wednesday 29/11/2023	08.30 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
Pamol Kluang POM	12.30 – 13.30	Lunch	√	√	√

Date	Time	Subjects	NHAZ	MAS	RZ
	13.30 – 16.30	Lab, weighbridge, and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Thursday 30/11/2023	08.30 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Friday 01/12/2023	08.30 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate	12.30 – 13.30	Lunch & Friday Prayer	√	√	√

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Date	Time	Subjects	NHAZ	MAS	RZ
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.00 – 16.15	Audit Team Discussion and report preparation	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Saturday 02/12/2023	08.30 – 12.30	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation & etc.)	√	√	
IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate & IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate	12:30 – 13:00	Audit Team Discussion and report preparation	√	√	√
	13:00 – 14:00	Closing Meeting	√	√	√
	PM	Audit Team travel back to Kuala Lumpur	√	√	√

NC Closure Assessment Plan

Date	Time	Subjects	NHA
Wednesday, 31/01/2024	-	Auditor Travelling	√
Thursday, 01/02/2024	09:00 – 09:15	Opening Meeting: • Opening Presentation by Lead Auditor • Confirmation of assessment scope and finalize Audit plan	√
	09:15 – 11:30	• Verification on previous Major NC: 2428663-202311-M1 • Site observation, workers interview (individual and group session) if necessary • Document review – implemented evidence	√
	11:30 – 12:00	Closing Meeting	√
	12:00	Auditor Travelling	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Time bound plan included all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company. IOI Time Bound Plan has been approved by RSPO on 19/05/2023.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 19/05/2023 was approved RSPO. The approved TBP states that IOI Corporation Berhad plans to achieve 100% RSPO Certification for all estates and mills by 2025.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new acquisition. For PT Sawit Nabati Agro (SNA) all group except PT Kalimantan Prima Agro Mandiri (KPAM) has undergone certification audit. Meanwhile, for PT KPAM and IOI Pelita is planning to be certified in 2024 and 2025 respectively. Due to pandemic and in the process of obtaining the complete HGU and TBP has been approved by RSPO on 19/05/2023 for PT SNA and PT KPAM. Besides, the new proposed timebound for IOI Pelita approved by RSPO is justified as subject to the time requires for land survey endorsement and land excised activities. For PT Sawit Nabati Agro all group except PT Kalimantan Prima Agro Mandiri has been audited on 28/11/2022 to 03/12/2022. Final report has been completed at 16/07/2023 and certified.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	IOI RSPO Time Bound Plan is approved by RSPO with valid justification from IOI.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes. PT Sawit Nabati Agro is Estates under IOI Group which consist of 4 estates which is PT Berkat Nabati Sawit, PT Sukses Karya Sawit, PT Bumi Sawit Sejahtera and PT Kalimantan Prima Agro Mandiri. For PT Sawit Nabati Agro all group except PT Kalimantan Prima Agro Mandiri has undergone certification audit while PT KPAM plan to be certified in 2024. Due to Pandemic and in the process of obtaining the complete HGU and TBP has been approved by RSPO on 19/05/2023. For PT Sawit Nabati Agro all group except PT Kalimantan Prima Agro Mandiri has been audited on 28/11/2022 to 03/12/2022. Final report has been completed at 16/07/2023 and certified. IOI Pelita plan to be certified in 2025 and justified as subject to the time requires for land survey endorsement and land excised activities in reference to the approved TBP dated 19/05/2023	Complied

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<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 19/05/2023 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There have not been any isolated lapses in implementation of the plan. Plan for Certification has been conducted as per approved plan which year of 2022. Sites had been audited on 28/11/2022- 03/12/2022 and Major NC closure had been conducted on 10th to 11th May 2023. Final report has been completed at 16/07/2023 and certified.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 19/05/2023 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There has not been any isolated lapses in implementation of the plan.</p>	<p>Complied</p>
Un-Certified Units or Holdings		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>Updates on the RSPO CP Complaints case tracking were referred to on issues related to this on IOI's uncertified units prior to and during the audit. Verified that incidences of HCV clearance that were reported at the IOI's uncertified unit at Kalimantan, Indonesia namely PT Bumi Sawit Sejahtera since year 2010 is being resolved as per the RSPO NPP and RSPO CP Complaints processes. Another 1 unit, namely PT Kalimantan Prima Agro Mandiri at Kalimantan, had undergone the NPP Public Consultation and approved in April 2018 and HCSA Peer Review Assessment completed in May 2018. Currently, the plantation is under development and pending issuance by the Local Government HGU. Reports on the NPP progress made to resolve the issues at the said units were checked and monitored till latest update made available on: https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail As off this audit, there has been no other incidences of any replacement of primary forest at any other area under the IOI group</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>The concession in Indonesia PT Kalimantan Prima Agro Mandiri had undergone the NPP process prior to any new planting. RSPO has approved PT Kalimantan Prima Agro Mandiri NPP Summary Report and was published on the RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below: https://rspo.org/certification/new-planting-procedure/public-consultations/page/2? 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>Complied</p>

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	http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf	
<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 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility as per the link below: https://askrspo.force.com/Complaint/s/case/50090000028ErzqAAC/detail This is further check in the website: https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . Only 1 (one) management unit identified with potential liability and require concept note and remediation plan as reported in case tracker. Further information on the current progress is available in IOI Corporation Berhad’s website: https://www.ioigroup.com/sustainability/ioi-pelita-current-progress. The land conflict in IOI Pelita had been resolved and the complaint was formally closed. Further information on the status of the case is available in RSPO Complaints Portal website Case: GR-000926 (force.com) Details of the process taken by IOI for the conclusion of the issue can be referred in the IOI website https://www.ioigroup.com/sustainability/ioi-pelita-current-progress; https://www.ioigroup.com/press-releases/ioi-announces-final-settlement-of-the-ioi-pelita-sarawak-land-dispute-case</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>There were no labour disputes reported. IOI continued to monitor the labour issue. The JCC Meeting that involved by top management was conducted to ensure there is no labour issue in IOI business. Website checked confirmed that there is no issue on Labour Disputes.</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>There was no legal non-compliance reported. IOI continued to comply with all applicable legal requirements. Compliance to each applicable law and regulation are monitored by the operating units. The certification units obtained and renewed licenses and permits as required by the law. Website checked confirmed that there is no issue on Legal non-compliance.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be</p>	<p>Yes. Internal audit was carried out for IOI Pelita Plantation Sdn Bhd (Sejap Estate) and PT Sawit Nabati Agro Group in November 2022. A positive assurance statement was available and justified. Where related to</p>	<p>Complied</p>

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available and justified.	land rights, IOI is actively resolving it. Frequency on internal audit was conducted on yearly basis.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders are being engaged during stakeholders' consultation which are being carried out during social impact assessment (SIA). Issues raised during the session are being recorded and actions/resolutions being handled by respective units.	Complied

3.2 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 since there is no scheme smallholders and scheme out growers.	Not Applicable

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP (Only applicable when revision is made)			
							Any revision from the last approved TBP?	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Pamol Kluang	Pamol Kluang POM	-	Certified		2010	24/4/2022	No			
	Pamol Timur Estate	1,856.55	Certified		2010	24/4/2022	No			
	IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate	440.07	Certified		2010	24/4/2022	No			
	Pamol Barat Estate	1,614.33	Certified		2010	24/4/2022	No			
	IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate	689.14	Certified		2010	24/4/2022	No			
	Mamor Estate	2,230.00	Certified		2010	24/4/2022	No			
	Unijaya Estate	1,260.50	Certified		2010	24/4/2022	No			
	Kahang Estate	2,419.90	Certified		2010	24/4/2022	No			
Bukit Leelau	Swee Lam Estate	1,160.96	Certified		2010	24/4/2022	No			
	Bukit Leelau POM	-	Certified		2010	29/12/2021	No			
	Bukit Leelau Estate	2,096.00	Certified		2010	29/12/2021	No			
	Detas Estate	2,225.78	Certified		2010	29/12/2021	No			
	Merchong Estate	1,952.50	Certified		2010	29/12/2021	No			
	Mekassar Estate	1,209.39	Certified		2010	29/12/2021	No			

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	Leepang A Estate	2,403.70	Certified		2010	29/12/2021	No			
	Laukin A Estate	1,619.90	Certified		2010	29/12/2021	No			
Gomali	Gomali POM	-	Certified		2010	24/8/2021	No			
	Gomali Estate	2,555.75	Certified		2010	24/8/2021	No			
	Paya Lang Estate	2,467.25	Certified		2010	24/8/2021	No			
	Tambang Estate	2,010.70	Certified		2010	24/8/2021	No			
	Sagil Estate	2,504.99	Certified		2010	24/8/2021	No			
	Regent Estate	2,300.27	Certified		2010	24/8/2021	No			
	Bahau Estate	2,841.41	Certified		2010	24/8/2021	No			
	Kuala Jelai Estate	679.2600	Certified		2010	24/8/2021	No			
	Bertam Estate	448.8000	Certified		2010	24/8/2021	No			
	Jasin Lalang Estate	750.75	Certified		2010	24/8/2021	No			
	Pukin	Pukin POM	-	Certified		2012	13/6/2022	No		
Pukin Estate		2,428.12	Certified		2012	13/6/2022	No			
Shahzan IOI 1 Estate		1,562.98	Certified		2012	13/6/2022	No			
Shahzan IOI 2 Estate		1,640.74	Certified		2012	13/6/2022	No			
Segamat Estate		1,896.40	Certified		2012	13/6/2022	No			
Leepang A Estate		2,725.12	Certified		2012	13/6/2022	No			
Bukit Serampang Estate		2,403.70	Certified		2012	13/6/2022	No			
Unico Group	Unico POM	-	Certified		2018	5/7/2021	No			
	Unico 6 Estates	2,060.00	Certified		2018	5/7/2021	No			
	Ladang Asas Estates	1,909.00	Certified		2018	5/7/2021	No			

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Unico Desa	Unico Desa POM	-	Certified		2018	16/5/2022	No			
	Unico 1 Estate	2,317.50	Certified		2018	16/5/2022	No			
	Unico 2 Estate	2,352.02	Certified		2018	16/5/2022	No			
	Unico 3 Estate	2,203.80	Certified		2018	16/5/2022	No			
	Unico 4 Estate	2,235.69	Certified		2018	16/5/2022	No			
	Unico 5 Estate	2,287.47	Certified		2018	16/5/2022	No			
Morisem	Morisem POM	-	Certified		2013	18/12/2021	No			
	Morisem 1 Estate	2,032.00	Certified		2013	18/12/2021	No			
	Morisem 2 Estate	2,042.14	Certified		2013	18/12/2021	No			
	Morisem 3 Estate	2,013.70	Certified		2013	18/12/2021	No			
	Morisem 4 Estate	2,023.00	Certified		2013	18/12/2021	No			
	Leepang 2 Estate	2,159.19	Certified		2013	18/12/2021	No			
Syarimo	Syarimo POM	-	Certified		2013	20/3/2022	No			
	Syarimo 1 Estate	1,914.00	Certified		2013	20/3/2022	No			
	Syarimo 2 Estate	1,986.52	Certified		2013	20/3/2022	No			
	Syarimo 3 Estate	2,442.02	Certified		2013	20/3/2022	No			
	Syarimo 4 Estate	2,376.95	Certified		2013	20/3/2022	No			
	Syarimo 5 Estate	2,267.55	Certified		2013	20/3/2022	No			
Baturong	Baturong POM	-	Certified		2010	8/10/2021	No			
	Baturong 1 Estate	2,698.00	Certified		2010	8/10/2021	No			
	Baturong 2 Estate	2,315.00	Certified		2010	8/10/2021	No			
	Baturong 3 Estate	1,807.00	Certified		2010	8/10/2021	No			

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	Cantawan Estate	1,163.00	Certified		2010	8/10/2021	No			
Leepang	Leepang POM	-	Certified		2013	16/12/2021	No			
	Morisem 5 Estate	1,889.00	Certified		2013	16/12/2021	No			
	Leepang 1 Estate	2,364.04	Certified		2013	16/12/2021	No			
	Leepang 5 Estate	1,690.67	Certified		2013	16/12/2021	No			
	Permodalan 1 Estate	2,253.82	Certified		2013	16/12/2021	No			
	Permodalan 2 Estate	2,141.52	Certified		2013	16/12/2021	No			
Mayvin	Mayvin POM	-	Certified		2010	22/12/2021	No			
	Mayvin 1 Estate	1,610.00	Certified		2010	22/12/2021	No			
	Mayvin 2 Estate	1,812.81	Certified		2010	22/12/2021	No			
	Tangkalap Estate	2,277.45	Certified		2010	22/12/2021	No			
	Mayvin 5 Estate	1,765.18	Certified		2010	22/12/2021	No			
	Mayvin 6 Estate	1,836.82	Certified		2010	22/12/2021	No			
Sakilan	Sakilan POM	-	Certified		2010	16/4/2022	No			
	Sakilan Estate	2,296.37	Certified		2010	16/4/2022	No			
	Linbar 1 Estate	2,628.17	Certified		2010	16/4/2022	No			
	Linbar 2 Estate	2,211.83	Certified		2010	16/4/2022	No			
Pamol Sabah	Pamol Sabah POM	-	Certified		2016	30/11/2021	No			
	Ulu Estate	1,834.72	Certified		2016	30/11/2021	No			
	Bayok Estate	2,209.93	Certified		2016	30/11/2021	No			
	Rungus Estate	2,126.55	Certified		2016	30/11/2021	No			
	Tindakon Estate	2,051.02	Certified		2016	30/11/2021	No			

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	Nangoh Estate	2,279.35	Certified		2016	30/11/2021	No			
	Meliau Estate	2,998.65	Certified		2016	30/11/2021	No			
	Sugut Estate	1,792.34	Certified		2016	30/11/2021	No			
Ladang Sabah	Ladang Sabah POM	-	Certified		2013	10/4/2022	No			
	Bimbingan 1 Estate	1,937.39	Certified		2013	10/4/2022	No			
	Bimbingan 2 Estate	1,955.61	Certified		2013	10/4/2022	No			
	Labuk Estate	2,668.50	Certified		2013	10/4/2022	No			
	Moynod Estate	3,043.71	Certified		2013	10/4/2022	No			
	Luangmanis Estate	2,713.29	Certified		2013	10/4/2022	No			
	Laukin Estate	2,503.53	Certified		2013	10/4/2022	No			
	Terusan Baru Estate	2,128.00	Certified		2013	10/4/2022	No			
	Sungai Sapi Estate	1,299.30	Certified		2013	10/4/2022	No			
	PT Sawit Nabati Agro	PT. Sukses Karya Sawit (SKS) POM		Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU
SKS 1 Estate		1,396.81	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
SKS 2 Estate		3,156.39	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
SKS 3 Estate		3,126.80	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process	19/5/2023

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									of obtaining the complete HGU	
	PT Berkat Nabati Sawit (BNS) 1 Estate	2,867.42	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
	BNS 2 Estate	1,513.94	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
	BNS 3 Estate	2,128.60	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
	BNS 4 Estate	2,320.04	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
	PT Bumi Sawit Sejahtera (BSS) 1 Estate	3,563.85	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
	BSS 2 Estate	2,041.15	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
	BSS 3 Estate	2,509.10	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023

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	BSS 4 Estate	1,689.90	Not Certified	2021		3/12/2022	Yes	2023	Due to Pandemic and in the process of obtaining the complete HGU	19/5/2023
	PT Kalimantan Prima Agro Mandiri (KPAM) 1 Estate	2,408.00	Not Certified	2023		3/12/2022	No	2024		4/11/2022
	KPAM 2 Estate	2,499.83	Not Certified	2023		3/12/2022	No	2024		4/11/2022
	KPAM 3 Estate	2,307.02	Not Certified	2023		3/12/2022	No	2024		4/11/2022
	KPAM 4 Estate	1,252.15	Not Certified	2023		3/12/2022	No	2024		4/11/2022
IOI Pelita Plantation Sdn Bhd	Sejap Estate	4,959.80	Not Certified	2025		Nov 2021	Yes	2025	Subject to the time required for land survey endorsement and land excised activities.	19/5/2023

3.3 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) Critical; two (2) Minor nonconformities and five (5) Opportunity For Improvement raised. The Pamol Kluang Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2428663-202311-M1	Issued Date	02/12/2023
Due Date	01/03/2024	Closure Date	01/02/2024
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	The workers are not utilizing the provided Personal Protective Equipment (PPE).		
Requirement Reference:	(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.		
Objective Evidence:	Location: Pamol Kluang POM During a workplace visit as part of the audit, it was noted that two workers were cutting grass using a knapsack grass cutter without wearing any Personal Hearing Protector (PHP). Subsequent interviews with these workers confirmed their awareness of the requirement to wear the PHP, as the management had provided training on this matter. Furthermore, the workers attested to receiving the PHP free of charge. This information was cross verified with the PPE Issuance Record, confirming that the management had indeed supplied Personal Hearing Protectors (PHP) to these two workers as required.		
Corrections:	1. The supervisor concerned was issued with a warning letter for failing to ensure that the workers under his supervision use the appropriate PHP. 2. Warning letter was also issued to both workers because of failing to wear the PHP.		
Root Cause Analysis:	Though the mill management already issued, recorded and conducted PHP training for workers, 2 grass cutting workers were found not wearing ear plug. This was because the supervisor failed to check and enforce usage of PHP before commencement of work. Workers also did not used PHP despite being aware of the requirement as they did not realize the seriousness of the effects of not using the ear protection.		

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Corrective Actions:	<ol style="list-style-type: none"> 1. Pamol Mill Assistant Manager has retrained all related workers including workers, mandores and supervisors on the importance of usage and enforcement of PPE. 2. A PPE checklist has been developed and issued to supervisors to carry out daily inspection of their respective workers in the workplace.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Verification through interview with Grass Cutters has been conducted at Mill Compound found all of them was equipped with adequate PPE. Training has been given and they have good awareness on PPE usage. 2. Monitoring on PPE has been conducted by Supervisor as per record dated December 2023. Refer "Senarai Semak Pemeriksaan Alat Pelindung Diri (PPE)". Interview with supervisor and he was awareness on their task to check the availability of PPE during morning briefing. 3. Training on importance of PPE has been conducted on 21/12/2023. Sighted evidence of training material, attendance, and photos. Training evaluation to check trainee understanding has been recorded. Refer Training evaluation for with reference number 21/12/2023. 4. Interview with estate management confirmed that correction and corrective action has been implemented. <p>Based on the above evidence, the major non-Conformity is closed effectively on 01/02/2024. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2428663-202311-N1	Issued Date	2/12/2023
Due Date	Next Assessment (Recertification)	Closure Date	TBC
Indicator & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Contractors Sasaran Perentas Sdn Bhd, Sasaran Emas PLT and Sinar YSM Enterprise were not able to demonstrate that they have met applicable legal requirements.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>Contractors Sasaran Perentas Sdn Bhd, Sasaran Emas PLT and Sinar YSM Enterprise were not able to demonstrate that they have met applicable legal requirements.</p> <ol style="list-style-type: none"> 1. Sasaran Perentas Sdn Bhd entered into a FFB transportation agreement with IOI Plantation Services Sdn Bhd (Swee Lam Estate) which commenced from 1/9/2022 to 31/8/2025. Sasaran Perentas assigned its obligations under the contract to Sasaran Emas PLT without the written consent of IOI Plantations. This is not in accordance with Clause 2n) of the Agreement signed between the parties. 		

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	<p>2. Sasaran Emas PLT had entered into employment contract with its following workers:</p> <ul style="list-style-type: none"> a. Worker IC No. 700525-01-xxx on 7/9/2021. (Swee Lam Estate) b. Worker IC No 720127-06-xxx on 9/9/2021 (Swee Lam Estate) c. Worker IC No. 750517-01-xxx on 20/11/2022 (Kluang Pamol Mill) d. Worker IC No. 580831-01-xxxx on 13/9/2021 (Kluang Pamol Mill) <p>All the above employment contracts mentioned that the workers’ salary rate as “20% (Kargo), 17% (Tangki Minyak)”. It does not clearly specify the actual rates for salary calculation. This is not in accordance with Section 30 of Contracts Act 1950 which states that agreements with uncertain meaning or capable of being made certain, are void.</p> <p>3. Sinar YSM Enterprise (domestic waste transporter at Mamor Estate) did not accurately deduct its workers’ SOCSO contributions in accordance with the quantum prescribed under the SOCSO Act. Worker IC No. 951128-01-xxxx earned RM1,500 wages for July and August 2023. SOCSO deductions made for both months were RM8.75, whereas the legal deduction should be RM7.25 per month.</p>
<p>Corrections:</p>	<p>(1) Location: Swee Lam Estate IOI Plantation will issue a memo regarding the status of the subcontractor pending written approval. Swee Lam Estate will engage with the Contractor to ensure they understand the content of Contract Agreement prior agree with all the terms and conditions.</p> <p>(2) Location: Swee Lam Estate and Pamol Kluang POM The management of Swee Lam Estate and Pamol Kluang POM had discussed the issue on contract of employment with Sasaran Emas PLT management. The contractor agreed to rectify the issue on their workers’ contract of employment by providing amended contract of employment to their workers.</p> <p>(3) Location: Mamor Estate Estate management had notified Sinar YSM Enterprise to make the payment to their workers regarding on the SOCSO reduction to align with the legal requirements as per the SOCSO Act. Besides, to ensure that Sinar YSM does not repeat the same issues, estate management will ensure that Sinar YSM Enterprise reviews its procedures for calculating and deducting SOCSO contributions to reflect the correct deduction rates.</p>
<p>Root Cause Analysis:</p>	<p>(1) Location: Swee Lam Estate As the owner of both contractors are siblings, the businesses are likely run together unofficially. The workers are also provided by the contractor from one entity to the other, with understanding from both contractors that they are sharing the same workers. However, this practice was not aligned with the Contract Agreement signed between IOI Group (Mamor Estate) and the Contractor. Explicit approval must be requested by the contractor to IOI Group prior to any work to be carry out by their subcontractor within the estate. The justification from the Contractor during the external stakeholder interview indicate that there is lack of awareness on some of the content in the Contract Agreement as the document is prepared in English. It has also been requested the</p>

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	<p>contractor for the document to be also prepared in Malay for their better understanding. Furthermore, any important points should be highlighted.</p> <p>(2) Location: Swee Lam Estate and Pamol Kluang POM</p> <p>Though management collects copies of contractors' employment contracts from contractors, the contents of the contracts has not been properly verified and monitored as they were not well trained and did not have a guidance to do so.</p> <p>Furthermore, based on interviews with contractor employees, they fully understood how their salary is being calculated as they received their salary based on the trips and tonnage basis. The drivers are also aware of this practice and the salary statement details has been shared by the contractor to each one of their workers.</p> <p>(3) Location: Mamor Estate</p> <p>Sinar YSM Enterprise just hired a new staff member, or Person In-charge (PIC), to handle the payment the salary payment including SOCSO. At the same time, estate management was also not aware of and did not do any verification on the payslip regarding the SOCSO deduction made by them.</p>
Corrective Actions:	<p>(1) Location: Swee Lam Estate</p> <p>The Sustainability Department will continuously monitor the contractor's workers. The checklist which was used to monitor will be updated for a better reflection towards the current operating procedures.</p> <p>Future Contract Agreement's between IOI Group and Contractor's will be better improved in the language understood by the Contractor.</p> <p>Standardization of definitions and categorizations has been completed. Training will be provided to Assistant Managers and Sustainability and Safety Supervisors.</p> <p>(2) Location: Swee Lam Estate and Pamol Kluang POM</p> <p>A re-training on contractors' documentation will be carried out for estate and mill management by the Sustainability Team. The management team is advised to use the attached checklist to check on all documents submitted by contractors, such as contract agreements, payslips, road tax, insurance, employment contracts, etc., to ensure that they comply with sustainability and legal requirements.</p> <p>It is compulsory for the management of Operating Unit to closely follow up if any documents are not in order as per required. Sustainability Department will countercheck the practice during their internal audit session to the operating centre.</p>
Assessment Conclusion:	<p>The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.</p>

Non-conformity			
NCR Ref #	2428663-202311-N2	Issued Date	2/12/2023
Due Date	Next Assessment (Recertification)	Closure Date	TBC
Indicator & Category (Critical / Minor)	7.8.1 (Minor)		
Statement of Nonconformity:	Monitoring of Water Management Plan was not fully executed.		

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Requirement Reference:	<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>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water. - Minor compliance -</p>
Objective Evidence:	<p>During site visit at Mamor Estate, Buffer Zone Area Stream C at PM00E (CMM1), it was observed that effect on chemical (drying grass and woody weed (Melastoma Malabathricum) at both sites of the stream indicate that weeding activity using chemicals has encroached beyond the buffer zone area). It was not in line with Natural water Stream Monitoring Plan stated on "Harvesting is allowed however, avoid spraying and manuring along the buffer zone".</p> <p>During site visit at Water Treatment Plan and verification of document at Swee Lam Estate, it was noted that consumption of water (Abstraction) was over the limit set in the Specific Environmental Permit: BAKAJ Licence (BAKAJ/334/300/05/01/07/02) valid until 31/12/2023. Details To date Meter as at 31/10/2023 = 58714 m3, Actual meter reading as at 28/11/2023 = 61675 m3, Average usage/day = 105 m3, Permitted abstraction / day = 60 m3.</p>
Corrections:	<p>(1) Location: Mamor Estate The area affected by the spraying are properly disposed and planted with grass and legumes to cover back the buffer zone.</p> <p>(2) Location: Swee Lam Estate The estate management has sent an email to BAKAJ on the 29th of November 2023, seeking an approval to increase the permissible limit of daily water extraction from 60m3/day to 100m3/day.</p>
Root Cause Analysis:	<p>(1) Location: Mamor Estate The root cause for non-compliance is identified in the fact that the estate conducted a spraying program in June 2023, during which both the mandore and the supervisor in charge of the spraying activity had been transferred to monitor the spraying activity in May 2023. These personnel had not attended any training on the dos and don'ts in the buffer zone area, as the record of training conducted was on 17th March 2023. Consequently, effective supervision of the spraying activities was hindered, as the supervisor and mandore had not undergone training before supervising the spraying gang.</p> <p>(2) Location: Swee Lam Estate In the latest revision water management plan, there is no plan has been established to monitor the limit of the daily water extraction against the water usage in the operating centre. Thus, there is no mechanism in place for estate management to monitor the daily extraction rate.</p>
Corrective Actions:	<p>(1) Location: Mamor Estate A reminder email will be sent to all operating centers to ensure that all newly joined or transferred workers and supervisors undergo related training before undertaking new tasks. Besides, training on the buffer zone will be conducted for all the spraying gang inclusive mandore and field supervisors.</p> <p>(2) Location: Swee Lam Estate</p>

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	<p>The water management plan will be revised by detailing up the allowable amount of water that can be extracted based on the BAKAJ license.</p> <p>Swee Lam Estate also is actually in the progress of changing their water supply to government water which is provided by Ranhill SAJ and expected to be completed in 2024. The installation of piping system has been done on 24th October 2023 and Ranhill SAJ had issued a recommendation letter for the subsequent workflow.</p> <p>The sustainability team will update the audit checklist to ensure that all operating centers comply with the abstraction license issued by government bodies.</p>
Assessment Conclusion:	<p>The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>2428663-202311-I1</p> <p><u>Indicator 6.2.5</u></p> <p>As part of the efforts to improve workers’ access to affordable food, Mamor Estate carries out price comparison between items sold at Kedai Lora and shops at the nearest town. The last price comparison exercise was done on 10/8/2023. This can be further improved if it was done after price increase of essential food items e.g. rice in September.</p>
OFI 2	<p>2428663-202311-I2</p> <p><u>Indicator 6.5.2</u></p> <p>Briefing on reproductive rights were given to workers by all operating units. As an opportunity for improvement, the latest briefing template be used during such briefings.</p>
OFI 3	<p>2428663-202311-I3</p> <p><u>Indicator 6.5.4</u></p> <p>A grievance mechanism for victims to lodge a harassment report has been established and successfully implemented. As an opportunity for improvement, the grievance process that has been implemented is reflected in the flowchart.</p>
OFI 4	<p>2428663-202311-I4</p> <p><u>Indicator 3.6.2</u></p> <p>Location: Pamol Kluang POM</p> <p>(a) The mill management plans to engage a JKPP-approved assessor to conduct the NRA (Additional) for the work units involving the grass cutter, silent room, effluent mono pump, and shovel driver. The proposal, referenced as PMM/ADD NRA/11/2023 dated 20-Nov-2023, was reviewed during the current audit. The assessment is expected to take place in Jan-2024. This will be follow-up during next audit.</p> <p>(b) The assessment of the appropriate type of fire extinguisher and the determination of its optimal location within the processing area of the palm oil mill could be improved.</p> <p>Location: Mamor Estate</p> <p>The facility designated for workers to wash their PPE after work could benefit from improvements to align with the Ergonomics Plan as outlined in the Occupational Safety and Health (OSH) Plan 2023.</p> <p>Location: IOI Organic Oil (M) Pamol Barat Estate</p> <p>The safety features for the stairs leading to the store area, specifically designated for storing materials used in the allocated organic area, can be enhanced.</p>

OFI 5	<p>2428663-202311-I5</p> <p><u>Indicator 5.2.1</u></p> <p>Location: Pamol Kluang POM & all audited estates</p> <p>The methodology regarding how the unit of certification consults with interested smallholders, irrespective of their type, including women and other partners in their supply base, to assess their needs for support in improving their livelihoods and their interest in RSPO certification could be further enhanced.</p>
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Positive Findings	
PF #	Description
PF 1	Good arrangement for audit visit and high commitment by Sustainability Department and units person in charge.
PF 2	Good positive relationship maintained and highlighted by internal and external stakeholders

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2280555-202211-M1	Issued Date	25/11/2022
Due Date	25/02/2023	Closure Date	08/02/2023
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	Mitigation Plans and Procedures related H&S Risk was not fully implemented.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p><u>Pamol POM</u></p> <p>During site visit at the Shovel operations at the EFB Yard, it was found that the Shovel was without side mirrors, rare view mirror, reverse censor and treadles tires. HIRARC for Shovel dated 16/02/2022 was reviewed. Monitoring of risk control has not effectively been done.</p> <p>During site visit at the Ramp, it was noticed that 1 tractor driver with registration number JKU 2032 from the estate were wearing rubber shoes as their PPE. It was not in line with HIRARC Tractor dated 16/02/2022 Existing Control PPE: Topi Keselamatan, Kasut Keselamatan.</p> <p>During site visit at the Boiler, it was found that 1 unit of container was contained with lubricant without any label. It was not in line with CHRA recommendations dated 19/04/2019, 8.1.10 Labelling & Relabelling (Regulation 20 & 21) Containers containing chemical hazardous to Health has to be labelled.</p> <p><u>Unijaya Estate</u></p> <p>During site visit at Harvesting area (Motorized Cutter) at PM16B, it was noted that petrol was brought for motorized cutter usage. However, the container was not labelled. Other than that, there were no SDS brought to that area for emergency purpose. It was not in line with CHRA recommendation dated 08/04/2019 8.1.10</p>		

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	<p>Labelling & Relabelling (Regulation 20 & 21) Containers containing chemical hazardous to Health has to be labelled and Section 8.1.13 Provision of SDS In Place Of Work: It shall be kept in a conspicuous place close to each location where chemical is used and be easily accessible to the workers and made available in the National Language and English.</p>
Corrections:	<p><u>Pamol POM</u></p> <p>a) Pamol Mill has instructed the contractor to stop using the shovel with immediate effect until he repairs and installs the side mirrors, rear view mirror, reverse sensor and change the tires.</p> <p>b) The AP in-charge has been given a verbal warning to ensure that all persons entering the mill workplace e.g. ramp, weighbridge, process area wear proper safety shoes and hard hat.</p> <p>c) Pamol Mill has retrained all workers to ensure that containers that contain fuel, chemical and lubricants have SDS and labels. Pamol Mill has also re-labelled all containers that are used to transfer fuel, lubricants and chemicals from their original containers.</p> <p><u>Unijaya Estate</u></p> <p>The management has instructed storekeeper and supervisors/staffs to ensure that all chemical containers that contain chemicals, fuel and lubricants have SDS and labels. SDS are to be available at all areas that the chemicals are used or stored.</p>
Root Cause Analysis:	<p>Ineffective monitoring systems in order to ensure compliance the management plan as per stated in hazard risk assessment and CHRA due to no specific documentation control system for monitoring.</p>
Corrective Actions:	<p><u>Pamol POM</u></p> <p>a) A shovel checklist has been developed and issued to the contractor to carry out daily inspection of his shovel and working equipment in the workplace.</p> <p>b) A checklist has been developed and implemented. Pamol Mill will carry out routine inspections to ensure shovels are in good condition and repairs are carried out as soon as possible. Training was conducted for all APs to ensure proper checking is carried out before vehicles are allowed to enter the mill compound.</p> <p>c) A memo was sent to all mill APs, contributing estates and contractors to wear safety shoes and hard hat if entering the mill workplace e.g. ramp, weighbridge, process area. Training was conducted for all APs to ensure proper checking is carried out before anyone or vehicle is allowed to enter the mill compound.</p> <p><u>Unijaya Estate</u></p> <p>a) The existing checklist has been revised to include checking of labelling and SDS for all chemical containers before they are taken to the fields.</p> <p>b) A refreshment training was carried out for all storekeeper, staffs and mandores on the requirement of labelling and SDS for all chemical containers.</p>
Assessment Conclusion:	<p>Site visit for Major Non conformities has been conducted on 08/02/2023</p> <p><u>Pamol POM</u></p> <p>a) Site visit has been conducted to EFB yard area where the shovel is operating. Sighted that side mirrors, rear view mirror, reverse sensor and tire has been replaced. Based on the documentation, sighted that checklist for monitoring shovel has been established and implemented. Sample has been taken for November 2022.</p> <p>b) Interview with auxiliary police has been conducted during the visit. Based on interview, it has been confirmed that they received written warning from the</p>

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	<p>management and training has been conducted for them on the process for FFB received. Training records sighted dated 13/12/2022. During the visit also, sighted that all FFB lorry driver is wearing appropriate PPE (safety helmets and safety shoes)</p> <p>c) Refreshment training for chemical handler and storekeeper has been conducted on 29/11/2022 by Mr Chua Seng Wei. As per interview with workers at boiler station and store keeper, they can demonstrate their understanding on the training. Sighted also all chemical has been labelled appropriately and sighted specific container has been allocate for chemical transfer from store to boiler area.</p> <p><u>Unijaya Estate</u></p> <p>a) Checklist for harvesting workers sighted in the document "Senarai Semak alat pelindung diri penuai dan penolak buah sawit manual atau berjentera/pengutip biji/penyusun pelepah" sighted and include SDS as one of the requirement. Sample for checklist has been taken for November and December 2022. Training for all harvesters sighted 10/12/2022 and base on interview, there is evidence that all harvesters can demonstrate their understanding on the training. Sighted that all chemical for petrol has been labelled accordingly. SDS has been carried by the mandore. Correction and corrective action has been identified sufficient to close the NC.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>The corrective actions taken in response to the identified non-compliance were found to be sufficient and effective. The implementation of these corrective actions was verified during the Annual Surveillance Audit (ASA 2_4), with specific details outlined below:</p> <p>Pamol Kluang POM:</p> <ol style="list-style-type: none"> (1) Site visit was conducted at the EFB Yard. A shovel was observed in operation, and it was noted that the equipment was equipped with side mirrors, a rear-view mirror, and tires in good condition. Subsequently, the driver was requested to engage the reverse function, and it was confirmed that the reverse sensor was in proper working order. Additionally, as part of the documentation review, evident the checklist for shovel monitoring covering for the months of Oct-2023 and Nov-2023. (2) Site visit was conducted at the weighbridge, where a tractor in the process of delivering FFB to the POM was observed. The tractor driver was noted to be appropriately attired, wearing safety shoe, safety helmet, and safety vest. In addition to the site visit, a documentation review included the review of a checklist for monitoring drivers entering the POM area. This checklist covered the months of October 2023 and November 2023 and was filled out by the AP and verified by the Assistant Manager. (3) During a site visit at the Boiler, it was observed that the lubricant containers were appropriately labelled. Additionally, a specific container was allocated for the transfer of chemicals from the storage area to the boiler area. In interviews with workers, it was confirmed that only labelled containers are permitted for storing lubricants and other chemicals. Workers explained that if the label on a container is faded or missing, they follow a procedure to re-label the container. Moreover, if a container is found to be damaged, it is promptly sent to a scheduled waste store for proper disposal. <p>Audited Estate:</p> <ol style="list-style-type: none"> (1) During documentation review, evident the checklist titled " <i>Senarai Semak Alat Pelindung Diri Penuai Dan Penolak Buah Sawit Manual Atau Berjentera/Pengutip Biji/Penyusun Pelepah</i>" with the latest update recorded in November 2023.

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	<p>Additionally, training for all harvesters was conducted in Oct-2023. Moreover, during interviews, evidence was obtained indicating that all harvesters are capable of demonstrating their understanding of the training.</p> <p>The absence of similar non-compliance during the Annual Surveillance Audit (ASA 2_4) indicates that the corrective actions were effectively implemented and that the previously raised Major Non-Compliance during the Annual Surveillance Audit (ASA 2_3) remained closed.</p>
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Previous Audit Minor Non-conformity

NCR Ref #	2280555-202211-N1	Issued Date	25/11/2022
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Due Date	27/11/2023	Closure Date	02/12/2023
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Indicator & Category (Critical / Minor)	7.3.1 (Minor)
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Statement of Nonconformity:	The Waste Management Plans were not adequately implemented.
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Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.
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Objective Evidence:	The Waste Management Plans were not adequately implemented. Evidence as follows.
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The SW date of generation stated in the Inventory of Scheduled Wastes Monthly Records and on the Scheduled Waste sticker placed at the stores showed different dates.

Pamol Barat Estate

SW Code	Inventory Record Generation Date	Store Sticker Generation Date
SW 409	18/08/2022	17/08/2022
SW 305	21/08/2022	15/08/2022
SW 410 (Filter)	30/08/2022	Not available
SW 410 (PPE & Rags)	30/08/2022	18/08/2022
SW 312	15/09/2022	01/09/2022
SW 110	17/11/2022	18/11/2022

Swee Lam Estate

SW Code	Inventory Record Generation Date	Store Sticker Generation Date
SW 410	03/08/2022	30/08/2022
SW 305	04/08/2022	03/08/2022
SW 312	03/11/2022	03/08/2022

Unijaya Estate

The estate had generated SW305 (Waste Oil) on 16/08/2022 and still currently being

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	stored at the Scheduled Waste Store. Nevertheless, inventory of Scheduled Waste (e-swiss) as of November 2022 stated the balance for SW 305 was Zero. <u>Pamol Timur Estate</u>		
	SW Code	E-swiss Inventory Record	Store Sticker Generation Date
	SW410	Oct 2022	13/09/2022
	SW104	Oct 2022	13/09/2022
	SW 305	Oct 2022	30/09/2022
	SW 306	Oct 2022	30/09/2022
Corrections:	Operating Centres has immediately amended the dates on the scheduled waste labels to tally with the data in the ESWIS		
Root Cause Analysis:	Poor recording systems to ensure that inventory records and SW label is tally. Issues that has been highlighted in the environmental management plan has not been discussed in the meeting.		
Corrective Actions:	A new recording form has been prepared by Safety, Health and Environment department and sent to all operating centres entitled 'Scheduled Waste Generated Records'. Operating centres have been instructed to record data in this form whenever scheduled waste is generated and stored. The total SW generated is compiled at the end of each month before the total is keyed into the ESWIS system. Issues that highlighted in the environmental management plan will be discussed in the environment every quarter.		
Assessment Conclusion:	Sighted the Schedule waste generated record as at October 2023 has been maintained by the mill and estate. Training on the implementation has been conducted by the Safety, Health and Environment department on July 2023. E Swiss record was maintained and also the disposal record with refer to Consignment Note. Manual Inventory as at July 2023 has been verified with endorsement by executive. Disposal was conducted through Kualiti Alam Sdn Bhd. Refer to Environment Meeting 01/2023 and 02/2023 found the evidence on discussion for SW issue. The implementation of CAP was conducted accordingly thus Minor NC was effectively closed on 02/12/2023.		

Previous Audit Minor Non-conformity			
NCR Ref #	2280555-202211-N2	Issued Date	25/11/2022
Due Date	27/11/2023	Closure Date	02/12/2023
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	Implementation were not in accordance with IOI Procedures.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<u>Pamol POM</u>		

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	<p>During the site visit at the Final Discharge Water Pump. It was noticed that there were leakages from both the pumps. The leakages were not identified, and no action has been taken prior to the visit.</p> <p><u>Unijaya Estate.</u></p> <p>Sample of contract agreement between IOI Group and recruiting agent dated 21/04/2022 which mentioned in clause 2, that the management will reimburse total amount RM450 for passport and medical checkup. Newly recruited Indian workers has been sampled who joined on 05/09/2022 and found out reimbursement has not been paid in September salary.</p> <p><u>Pamol Barat Estate</u></p> <p>Monitoring of incoming and outgoing water course at 3 natural streams was done once a year by the estate management. The recent water sampling was done on 11/08/2022. The analysis was done by IOI Research Centre and the report results (Report Number: PBE/09/09/2022) was available for verification. The report states that the pH value at (W0822/029 APB-3) is 4.9 which is less than the Reference Range (> 5.0). There were no resampling and root cause identification done as per WQI Flowchart and procedures.</p>
Corrections:	<p><u>Pamol POM</u></p> <p>Residues from leakage of discharge water pump have been upkept by scrapping the floor and transferring the residues to the effluent pond. Besides, seal packing has been installed at mono pump to stop the leakage.</p> <p><u>Unijaya Estate</u></p> <p>The estate management has made arrangement to reimburse the payment of Pre-Medical Check-up and Normal Passport cost to the Indian workers in November 2022's salary.</p> <p><u>Pamol Barat Estate</u></p> <p>Stream water analysis: RC have been contacted to recollect the water sample and investigate the cause of low pH at APB-3. Appendix 2 for confirmation email from RC on the date of investigation and WQI re-sampling.</p>
Root Cause Analysis:	<p>Implementation of the procedure has not been properly done due to ineffectiveness of the training has been conducted.</p> <p><u>Pamol POM</u></p> <p>Monitoring has not been conducted and Preventive measure has not been established to ensure that there is no leakage at final discharge area.</p> <p><u>Unijaya Estate</u></p> <p>Ineffective monitoring on information dissemination and immature implementation since it just been implemented.</p> <p><u>Pamol Barat Estate</u></p> <p>Ineffective monitoring for incompliance of water analysis and unclear timeline in the procedure.</p>
Corrective Actions:	<p>Training for each SOP will conducted annually and assessment for understanding will be done after the training.</p> <p><u>Pamol POM</u></p> <p>Bund will be constructed to contain any accidental leakage. Preventive maintenance will be carried out on weekly basis to check the condition of pump/ pipes at effluent station.</p>

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	<p><u>Unijaya Estate</u></p> <p>The management issued a reminded memo to the office staffs to remind them and ensure all emails from Human Resources (HR) department will highlighted as "Highly importance" and inform management immediately. Besides, the payroll clerk is also reminded to monitor and ensure that any reimbursement for workers are being paid on time without delay in future.</p> <p><u>Pamol POM</u></p> <p>WQI Sampling Flowchart been updated and included the action and it timeframe that shall be taken by estate management if the river water analysis do not meet the specifications.</p>
Assessment Conclusion:	<p>Training on SOP has been conducted. Sighted evidence of training material, attendance and photos with training evaluation to check their understanding on training given. Bund has been constructed at Pamol Kluang POM. For new workers, all expenses has been reimbursed as per sample check with 4 newly recruited workers. Water sampling has been conducted and all result were within the parameter. Any result that exceed the parameter will be take action as per updated procedure established by person in charge. Refer water sampling report Pamol barat estate 21st water sampling report. The implementation of CAP was conducted accordingly thus Minor NC was effectively closed on 02/12/2023.</p>

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p><u>Indicator 3.5.1</u></p> <p>"IOI Plantation has established internal procedure title "Foreign workers recruitment guideline & procedure in Malaysia" and "Appendix D: Workers Declaration Standard Operating procedure" which stated that the new workers need to sign declarations when they arrived in Malaysia from the origin country. It can be further improve for the management to identify the best timing for the workers to sign the declaration in order to ensure that input received is based on the actual scenario.</p> <p>Verification / Follow-up actions:</p> <p>The Company has developed a document titled "Worker Declaration SOP" which has been implemented. This SOP requires the worker to affirm the legitimacy of the recruitment process twice; i.e., at the commencement of employment during induction, and another declaration to confirm the implementation, approximately 3 months thereafter.</p> <p>Sampled at Pamol Barat Estate were the declarations done by two newly arrived Nepali worker on 5/9/2022 and 28/3/2023 and three months later on 7/12/2022, and 30/6/2023, respectively.</p>
OFI 2	<p>OFI Statement:</p> <p><u>Indicator 6.2.4</u></p> <p>Linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.</p> <p>Verification / Follow-up actions:</p> <p>Monitoring Checklists are filled by EHAs who carry out weekly housing inspections. Based on the Monitoring Checklist reviewed, each contain detailed remarks and observations, which include comments such as grass that needs mowing, drains blocked by grass, and broken drains that need repair, which</p>

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	house had unsheathed sickle, sightings of lubricant oil outside a workers' house, etc. The detailed identification and remediation of these issues should lead to a more conducive living conditions.
OFI 3	<p>OFI Statement: <u>Indicator 7.3.2</u> The estates can initiate the process of updating the 'Name of Reporting Officer' for Scheduled Waste responsibilities and reporting to ensure in line with current PICs.</p> <p>Verification / Follow-up actions: Sighted evidence of appointment letter for person in charge on the Schedule waste. The competence person CePSWAM was appointed and monitored the SW matters. Based on interview with PIC, he/she had good understanding on their job responsibilities</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1852239-201911-M1	Major	2.1.1	29/11/2019	Closed on 28/02/2020
1992177-202011-M1	Major	5.1.6	26/11/2020	Closed on 11/01/2021
1992177-202011-M2	Major	6.2.3	26/11/2020	Closed on 11/01/2021
1992177-202011-M3	Major	6.2.4	26/11/2020	Closed on 11/01/2021
1992177-202011-N1	Minor	2.1.2	26/11/2020	Closed on 26/11/2021
2130109-202111-M1	Major	7.10.3	26/11/2021	Closed on 23/02/2022
2130109-202111-N1	Minor	7.11.3	26/11/2021	Closed on 25/11/2022
2280555-202211-M1	Major	3.6.1	25/11/2022	Closed on 08/02/2023
2280555-202211-N1	Minor	7.3.1	25/11/2022	Closed on 02/12/2023
2280555-202211-N2	Minor	3.3.2	25/11/2022	Closed on 02/12/2023
2428663-202311-M1	Major	6.7.3	02/12/2022	Closed on 01/02/2024
2428663-202311-N1	Minor	2.2.2	02/12/2022	"Open"
2428663-202311-N2	Minor	7.8.1	02/12/2022	"Open"

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Pamol Kluang Palm Oil Mill 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. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were

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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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Contractors and suppliers	Hew Yee Ki/Sasaran Emas PLT	By phone
	Lee Yew Hock/Sasaran Perentas	By phone
	Veniden Thomas/ Veniden Enterprise	Face to face
	Wong Ah Ngit	
	Than Thi Ming Deng/Kedai Runcit Lim Mau	
	Hew Yi Kee/Sasaran Emas PLT	
	Kalaiselvam/Sakhti Enterprise	
	Zaini bin Paiman/ Kejuruteraan Elektrik Padi Emas	
	Han Peng Gan /Kedai Runcit Lora	
	Mariayee/Kedai Runcit Mariayee	
	Francis Lee/Sasaran Emas PLT	
	Suman/Suman JCB Enterprise	
	Ramachandran/Rama Plantation	
	Vikneswaran/Jayakumar Maju Jaya Enterprise	
Jauhariah bt Jemu/Kedai Makan Mak Ju		
Local communities	Ma Jia Cheng/Vegetable farmer	Face to face
	Jaafar bin Kartubi/Ketua Kampong Seri Tambak	Face to face
	Maheswaran/Cowherd	Face to face
Schools	Azrizal Azamir/SK Ladang Pamol	Face to face
	Beh Boon Yit/SKJK(C) Kg Gajah	Face to face

Stakeholders comment	
1	<p>Contractors and suppliers</p> <p>Feedbacks:</p> <p>Contractors and suppliers generally have no issues against any of the operating units. Contracts are explained prior to signing. However, some of the contractors prefer to have the contract prepared in Bahasa Malaysia for easier understanding. Payments are received on time upon issuance of invoices.</p>

	<p>The contractors and suppliers are aware of legal obligations not to employ minors. None of the contractors employ foreign workers. They are also aware of the requirement to pay their workers minimum wages latest by the 7th day of book closing.</p> <p>Shop operators confirmed that they have to submit price list of main food items sold to the estates. This is to allow the estates to monitor any price changes. Workers are allowed to buy items on credit, and would repay their debts when they receive their wages.</p> <p>All of them were invited to attend external stakeholder meeting on 4/10/2023, but some could not attend. All of them are also aware of the grievance channel available to them.</p> <p>Audit Team verification and response: The contractors’ request to have their contracts prepared in English was relayed to the Sustainability Team and the request was noted.</p>
<p>2</p>	<p>Local communities</p> <p>Feedbacks: Local communities informed that there have been no overlapping land claims, and no social issues emanating from Pamol Kluang Mill and its supply base. The boundaries are clearly demarcated and respected. There has been no issue about thefts of FFB, and local communities are allowed access to their lands via estate road. The cowherd also said that his cows are allowed to graze within Pamol Barat Estate. So far relationship between the local communities and the operating units, including the workers have been harmonious.</p> <p>Audit Team verification and response: No further issues.</p>
<p>3</p>	<p>Schools</p> <p>Feedbacks: Pupils that attend school at SK Pamol and SJK(C) Kg Gajah are from the surrounding areas, including the estate, mill and nearby communities. Both the schools informed that relationship with the Mill and estates have been good. Any requests for help such as grass cutting and donations for school activities have received positive responses, and they are both grateful for the assistance rendered so far.</p> <p>Between the two schools, SK Pamol is the nearest to the Mill, whereas SJK(C) Kg Gajah is approximately 4kms away. Due to the immediate proximity, SK Pamol does encounter noise, odour and air pollution emanating coming from the Mill. Sometime in July 2023, a parent had anonymously complained to the Department of Environment about ash from the Mill soiling the pupils’ school uniform. Pejabat Pendidikan Daerah Kluang had requested a written report from the school.</p> <p>Audit Team verification and response: Sighted during the audit requests for contributions sent to Pamol Kluang Mill dated 2/7/2023. The Mill responded on 20/7/2023.</p> <p>Also sighted was the record of visit by the Department of Environment via Field Citation dated 21/6/2023. This visit was made pursuant to the complaint of received by the DOE regarding discharge of black soot from the Mill. It was noted by the DOE representative that the distance between SK Ladang Pamol and the boiler is more than 50 meters. The DOE also stated that the Mill’s CEMS system is working well, but data could not be retrieved.</p> <p>The Mill, via letter dated 5/7/2023 responded that the Mill was built first in 1950, which was 6 years before the school was built in 1956. Since it is now not a suitable location for a school, the Department of Education will be relocated to a new site as per Rancangan Malaysia ke-13 (RMK13). However, this is pending approval from the relevant authorities.</p> <p>Regarding the CEMS data which could not be retrieved, the Mill has contacted ST Engineering to have it rectified, and further improvements have been done with the installation of ESP (Electrostatic Precipitator)</p>

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	to reduce black soot which was completed in August 2023. Installation of gas engine is expected to complete by end of 2024, and DOE Kluang will continue to monitor CEMS data every month.
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List of landowner / 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
N/A	N/A	N/A	N/A	N/A	N/A
Notes: Not applicable. All estates under IOI Pamol Kluang POM certification units had undergone 2 nd cycle of replanting.					



Previous land owner / user comment	
	Feedbacks: Not applicable. All estates under IOI Pamol Kluang POM certification units had undergone 2 nd cycle of replanting.
	Audit Team verification and response: No further verification required.

3.5 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 is appropriate. Based on the results of this audit, it is concluded that Pamol Kluang Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Pamol Kluang Palm Oil Mill is remain certified. ✓</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name: MOHAMAD ZULKARNAIN BIN ZUBIR AHMADI
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: IOI PLANTATION SERVICES SDN. BHD.
Title: CLIENT MANAGER	Title: ASSISTANT MANAGER, SUSTAINABILITY
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 02/02/2024	Date: 02/02/2024

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>Documents specified in the RSPO P&C are made available to the public. These include land titles, OHS plans, reports, management and action plans for SIA, EIA and HCV, pollution prevention and reduction plans, records of complaints and grievances, stakeholder request procedures, negotiation procedures, grievance procedures, RSPO Public Summary Report, company policies and procedures, as well as continual improvement plans.</p> <p>In addition, IOI Group documents are also accessible through their Group’s website link: http://www.ioigroup.com</p> <p>At Pamol Kluang Mill and its supply base, the management documents related to environment, social and legal issues, were made available to the public except for those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Based meeting minutes, it was demonstrated that information such as company policies and procedures and RSPO requirements were provided to the stakeholders during external stakeholder consultation held on 4/10/2023 which was attended by representatives from SK Ladang Pamol, SJK(T) Ladang Pamol,</p>	Complied

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		<p>SOCISO, Saquosen Engineering, Zincon, MHE Demag, Leesonmech Engineering.</p> <p>Similarly, meeting minutes also showed that this information were provided to all internal stakeholders during the internal stakeholder meetings as follows: Mamor Estate (11/10/2023), Swee Lam Estate (21/9/2023), Pamol Kluang POM (13/9/2023), IOI Organic Oil (M) Pamol Barat Estate (11/11/2023) and IOI Organic (M) Pamol Timur Estate (27/10/2023).</p> <p>The information were provided in Bahasa Malaysia as well as English, and accessible to the relevant stakeholders as they are displayed on the main notice boards.</p>	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted was the record of visit by the Department of Environment (DoE) via Field Citation dated 21/6/2023. The DoE also stated that the Mill's CEMS system is working well, but data could not be retrieved and requested information of how this would be rectified.</p> <p>The Mill, via letter dated 5/7/2023 responded to the DoE that it has contacted ST Engineering to have the CEMS rectified, and further improvements have been done with the installation of ESP (Electrostatic Precipitator) to reduce black soot which was completed in August 2023.</p> <p>Based on records available, there has been no other request for information from external stakeholders during this audit period.</p> <p>Other requests sighted were as follows:</p> <ol style="list-style-type: none"> a. Swee Lam Estate: Request dated 17/4/2023 for donation for school sports day. The Estate responded on 18/4/2023. b. Pamol Kluang POM: Request from SK Ladang Pamol dated 2/7/2023 seeking donation. The Mill responded on 20/7/2023. 	Complied

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		<p>Request from SMK Seri Sembrong via letter dated 26/7/2023 to sponsor a school programme. The Mill responded on 31/7/2023.</p> <p>c. IOI Organic Oil (M) Pamol Barat Estate: Request dated 18/8/2023 Sri Subramaniyar Swamy Alayam temple requesting if they could carry out a religious ceremony at the estate temple and requested water tank. The estate replied on 1/9/2023 allowing outsiders to join in on condition cleanliness is maintained.</p> <p>d. IOI Organic Oil (M) Pamol Timur: Request for information from Hash House Harriers and Harriets of Gunung Lambak Kluang on 4/9/2023 if they could use IOI plantation as a run site. The reply and permission was given on 6/9/2023.</p>	
<p>1.1.4</p>	<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>Consultation and communication procedures are documented in the following documents:</p> <ol style="list-style-type: none"> 1. Stakeholder Request Procedure Flowchart (SOP 6.11; Rev 1B dated 28/12/2020); 2. Stakeholder Complaint Procedure Flowchart (SOP 6.11; Rev 1A dated 17/01/2017); 3. Negotiation Procedure (SOP 6.11; Rev 1A; dated 17/01/2017). <p>These documents were also displayed at the main notice boards throughout Pamol Kluang Mill and the sampled estates, namely, Mamor Estate, Swee Lam Estate, IOI Organic Oil (M) Pamol Barat Estate, and IOI Organic Oil (M) Pamol Timur Estate.</p> <p>These procedures were explained to all relevant stakeholders during the external stakeholder meeting held on 4/10/2023 by IOI's nominated representative, Rajan a/l Sinnathamby, Acting Mill Manager.</p>	<p>Complied</p>

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		<p>Implementation of the consultation and communication procedures were evident from the minutes of stakeholder meeting. All queries received from the stakeholders were responded to. Representative from SK Ladang Pamol asked about the odor emanating from the Pamol Kluang POM & to increase the frequency of rubbish disposals.</p> <p>The Mill responded by saying that it is in the process of upgrading its biogas facilities which is expected to operational in December 2023; after which the odor would be reduced. Rubbish disposal would also be done twice a week.</p> <p>Additionally, the stakeholders are also able to access to www.ioigroup.com or call the IOI Group General Line or write formal letter to Head Office of IOI if they have any requests or complaints.</p>	
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>Each unit within Pamol Kluang Mill and its supply base have their own list of stakeholders who comprise relevant government agencies, embassies and high commissions, neighboring estates and smallholders, neighboring local communities, schools, canteen/shop operators, suppliers, contractors, etc.</p> <p>Sighted and verified during the surveillance audit were the current list of stakeholder contacts and details (addresses and contact numbers) as well as their nominated representatives.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Sighted and verified during the surveillance audit was Policy known as 'Code of Business Conduct & Ethics' June 2020. Among others, this Policy calls for the following:</p> <p>Dealing fairly with customers, suppliers, contractors, competitors and other employees;</p>	Complied

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		<ol style="list-style-type: none"> 1. Avoid situations of conflict of interests between personal interest and interests of the Company; 2. Not to be influenced by receiving favours, and not to influence by giving favours; 3. Not to accept any kinds of bribes or kickbacks or other unlawful or unethical benefits. <p>This Policy is available on the IOI Group website. www.ioigroup.com and shared with external stakeholders.</p> <p>Based on documentation review and interviews held with relevant personnel, its contractors and suppliers, Pamol Kluang Mill and its supply based was able to demonstrate that this Policy is being understood and implemented. Contractors were required to sign a supplier code of conduct. Sampled during the surveillance audit were documents signed the following contractors:</p> <ol style="list-style-type: none"> 1. Sinar YSM Enterprise (domestic waste transporter) 2. Sasaran Perentas Sdn Bhd (FFB transporter) 3. Sasaran Emas PLT (FFB transporter) 4. Sakthi Enterprise (JCB contractor) 	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Systems are place to monitor compliance and implementation of the policy and overall ethical business practice. This include:</p> <ol style="list-style-type: none"> 1. Internal audit held on Mamor Estate (11/10/2023), Swee Lam Estate (18/10/2023), Pamol Kluang Mill (9/10/2023), IOI Organic Oil (M) Pamol Barat Estate (19/10/2023), IOI Organic Oil (M) Pamol Timur Estate (3/10/2023). 	Complied

		<ol style="list-style-type: none"> 2. Due diligence on the potential contractors done prior to signing of contract. This was sighted for Sinar YSM Enterprise and Sasaran Emas PLT. 3. A Contractor Document Checklist is used to determine compliance. This includes valid ID documents for workers, valid driving licenses, copies of workers' monthly payslips, evidence that salaries were paid at the latest on 7th of every month, copies of passports and permits, and evidence that the workers are at least 18 years old. 4. The contractors are required to submit employment contracts with their workers, the workers' payslips, evidence that salaries were paid at the latest on 7th of every month, copies of passports and permits, and evidence that the workers are at least 18 years old. <p>The above were reviewed and it was verified to be all in order.</p>	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>Based on the comprehensive information provided and verified during the site visit, interviews, and record reviews, it is evident that the operating units within the UoC are fully compliant with applicable legal requirements. The desktop study, coupled with the absence of any news related to law violations and the non-receipt of warning notices from Malaysian government authorities, further supports the compliance status.</p> <p>Pamol Kluang POM & Supply Bases has obtained and renewed license and permits as required by the law. Amongst the sampled licenses or permit viewed in the mill and estates were as following:</p>	Complied

		<p><u>Pamol Kluang POM:</u></p> <ul style="list-style-type: none"> • MPOB License: No. 500040104000, valid until 31/03/2024. • Deduction Permit from Employee's Salary (Section 24 Employment Act 1955): Serial Number PP3/29/041/2008, effective from 01-Dec-2008 and can be revoked by the Director-General of Labour at any time at his discretion. • Scheduled Controlled Item Permit under Regulation 18 under the Control of Supplies Act 1961 and its subsidiary legislation: Permit Serial Number J 005304 for 18,000 liters of diesoline, valid until 25/03/2024. • Approval of the registration notice for Class licenses for the private water supply system (Class Facility & Service License): Ref. No. SPAN/EKS/(PT)/800-4(1)/9/09 dated 29-Oct-2021, valid until 30/05/2024. • Excursion or Abstraction License for River Water (Section 7 Johor Water Enactment 1921): No. 08/A/Klg/055, valid until 31-Dec-2023. • The Competent Person certifications held by various personnel include: <ul style="list-style-type: none"> ▪ Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent: Certificate No. CePPOME/00289, registered since 07/10/2021 ▪ Certified Environmental Professional in Scheduled Waste Management: Certificate No. CePSWaM/2319188, valid until 16/01/2024 ▪ Engineer (Steam) Grade 2: Certificate No. 075/2021, certified since 10/11/2021 	
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		<ul style="list-style-type: none"> ▪ Engine Driver Grade 1 for steam engines and boilers: Certificate No. J 47/93, certified since 29/09/1993 ▪ Engine Driver Grade 2 for internal combustion engines: Certificate No. J-1/2002, certified since 27/03/2002 ▪ Competency Certificate as a Machine Operator (Electricity Supply Act 1990): Certificate No. PJ-T-4-B-0134-2011 for A4 category, certified since 04/08/2011 ▪ Authorised Gas Tester and Entry Supervisor for Confined Space (AGTES): Certificate No. Siri NW-HQ-AGT-0357-U, certified since 20/07/2022 ▪ Authorised Entrant and Standby Person for Confined Space (AESP): Certificate No. Sir NW-SRO-AE-R-8842-U, valid until 01/11/2024 ▪ Working Safely at Height (WAH): Certificate Serial No. NWAH12717N, valid until 20/01/2025 ▪ Hospital Assistant: registered under the Medical Assistants Act 1977, and the registration certificate numbered 18469 has been renewed, thereby maintaining the registration in the medical assistant registry until 31-Dec-2023. ▪ FFB Grader: No. Siri 02590, registered since 03/05/2017 • Certificate of Fitness: <ul style="list-style-type: none"> ▪ Air Compressor: No. PMT-JH/22 194878, valid until 29/02/2024 ▪ Steam Boiler: No. PMD-JH/22 194879, valid until 12/03/2024 	
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		<ul style="list-style-type: none"> ▪ Horizontal Sterilizer: No. PMT-JH/23 208902, valid until 22/08/2024 ▪ Steam Receiver: No. PMT-JH/23 207682, valid until 10/08/2024 ▪ Palm Oil Crane: No. PMA-JH/22 194873, valid until 29/02/2024 ▪ Chain Hoist: No. PMA-JH/22 194874, valid until 29/02/2024 <p><u>Mamor Estate</u></p> <ul style="list-style-type: none"> • MPOB License No. 511691002000 for Ladang Mamor for the activity of selling and moving FFB, valid until 31-Mar-2024 • Scheduled Controlled Goods Permit – Permit No.: PKSB/2023/B/J-000273 under Regulation 18 of the Supply Control Act 1961 and subsidiary legislation thereunder for 15,000 liters of diesel (euro 5), valid until 30-Apr-2025 • License To Divert Or Abstract River Water – Section 7 Under Water Enactment (Johor) 1921: Licensee No. 07/A/Klg/033, valid until 31-Dec-2023 • Appeal Application for Wage Deduction Under Section 24 (Labor Act 1955) for Electricity Bill Payment is approved by letter from Peninsular Malaysia Labour Department (Reference: BHG.PU/9/129/12(23)) dated 27-Dec-2019) • Certificate of Fitness – Non-flammable Pressure Container: No. PMT-JH/23 217362 for air receiver, valid until 11-Nov-2024 • Class License Under the Water Service Industry Regulations (Licensing) 2007 Under the Water Service Industry Act 2006 - Private Water Supply System, valid until 29-June-2025 	
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		<ul style="list-style-type: none"> • Certificate of Registration (On Trial) under the Estate Hospital Assistants Registration Board: Registration No P 1734 dated 01-June-2022 • Typhoid Vaccine for Water Treatment Plant Operator: Record No. 41993, valid until 11-Apr-2025 <p><u>Swee Lam Estate:</u></p> <ul style="list-style-type: none"> • MPOB License: 617329002000, valid until 30-Apr-2024 • Approval of Class License Registration Notice for Private Water Supply Systems (Facility & Service Class License) from the National Water Services Commission: LK/3/23/00053 dated 10-Jul-2023, valid until 09-Jul-2026 • Permit For Deduction from Employee's Wages (Section 24 Of the Labour Act 1955): No. Series PP4/29/111/2001 dated for the purpose of electricity usage payment through TNB. • License To Divert or Abstract River Water – Section 7 Under Water Enactment (Johor) 1921: No. License: 07/A/JP/080, Valid Until 31-Dec-2023 • Permit for Scheduled Controlled Goods under the Control of Supply Regulations 1974: Permit Serial Number J003897 for 13,600 liters of diesel and 100 liters of petrol, valid until 27-June-2024 • Estate Hospital Assistant: under the Medical Assistants (Registration) Act 1977: Registration Certificate No. 12942, valid until 31-Dec-2023 • Certificate of Fitness – Non-flammable Pressure Container: No. PMT-JH/23 222248 for air receiver, valid until 17-Jan-2025 	
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		<ul style="list-style-type: none"> • Typhoid Vaccine for Water Treatment Plant Operator: Record No. 21102020, valid until 13-Sept-2025 <p>For IOI Organic Oils (M) Sdn Bhd, the management overseeing this area remains under the purview of the respective estates, namely IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate under Pamol Barat Estate and IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate under Pamol Timur Estate. Consequently, the responsibilities for permits and licenses still fall under the management of the respective estates. Permits and licenses related to IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate and IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate that were sampled during the audit are outlined below:</p> <p><u>IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate:</u></p> <ul style="list-style-type: none"> • MPOB License: No. 504177802000, valid until 31/05/2024 • Scheduled Controlled Goods Permit: Permit Serial Number J 005335, for 18,000 liters of diesel oil (not subsidized), valid until 26-Feb-2024 • Authorization to Advance Salary Under Section 22 of the Employment Act 1955 – Personal Loans: Ref. No. (15) in BSM 7/2/35/30 Volume 2 dated 06/01/2004 • Estate Hospital Assistants Registration: According to the terms of Registration of Estate Hospital Assistants, Act of Parliament No.12 of 1965: Grade 1, No. Registration Q 1967, dated 23/03/2009 <p><u>IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate:</u></p> <ul style="list-style-type: none"> • MPOB License: No. 504178602000, valid until 31/05/2024 	
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		<ul style="list-style-type: none"> • Wage Deduction under Section 24 of the 1955 Labor Act: For the purpose of wage deduction for temple fund payment not exceeding RM 5.00 per month, church fund payment not exceeding RM 3.00 per month: Ref. No. TK (NJ) U – 23, dated 15/05/2019 • Wage Deduction under Section 24 of the Labor Act 1955: For payment of electricity bills: Ref. No. BHG. PU/9/129/12(20) dated 27/12/2019 • Wage Deduction under Section 24 of the Labor Act 1955: For water bill payment: Ref. No. BHG. PU/9/129/12(21) dated 27/12/2019 • Scheduled Controlled Goods Permit: Permit Serial Number J005343 for 18,000 liters of diesel, valid until 19/03/2024 • Certificate of Fitness: Air Compressor: No. PMT-JH/23 217361, valid until 15/11/2024 	
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.</p> <p>- Minor compliance -</p>	<p>Legal register covering the applicable local and international laws and regulations are available at Pamol Kluang POM & Supply Bases, which was reviewed on 31-Mar-2023 by Sustainability Department of Peninsular Region. This legal register includes Anti-Sexual Harassment Act 2022.</p> <p>The management of IOI Group has established a documented system for ensuring legal compliance is in place, which this system has a means to track changes to the laws and regulations, namely Mechanism of Tracking Law Changes and prepared by SPO Department on 27-Jul-2018. In this document, are listed the departments related to this matter and the responsibilities of those departments, as listed below:</p>	Complied

		<ol style="list-style-type: none"> (1) Legal Department, IOI HQ – to monitor and addition or changes in law that applicable to oil palm through news, subscription to Lexis Nexis, circular from relevant association (MPOA, MPOB, etc.) and trusted media such as internet or press release. (2) HR Department – to extract relevant clause in law concerning on employees’ rights. (3) Sustainability Department – to extract clause in law concerning on sustainability issue. (4) Administration Department – to extract relevant clause in law concerning on land issue. (5) Safety & Health Department – to extract relevant clause in law concerning on health & safety issue. (6) Estate Manager – to extract relevant clause in law concerning on oil palm issue. (7) Sustainability Department to follow up with changes: <ul style="list-style-type: none"> ▪ To evaluate the effect of changes of laws to estate/mill ▪ To compile and prepare a complete list of state and federal law and regulations. ▪ To assess current practices and suggest changes (if any) to be submitted to Senior Management (Group Plantation Director) (8) Senior Management to issue Memo/Policy in accordance the changes of law (9) Estate/Mill management to implement applicable changes in law accordingly. 	
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		<p>(10) Sustainability team to monitor implementation/updating of information via routine monitoring visit and internal audit.</p> <p>(11) Sustainability team to review the mechanism in 6-month basis or whenever necessary.</p> <p>(12) Any non-conformance would be clearly reported in internal audit report (which would be circulated to senior management) and appropriate action will be taken by the estate / mill management to comply.</p> <p>To ensure that each license and permit is renewed within the stipulated period, each operating unit monitors each of these licenses and permits in a record, namely Evaluation of License and Permits (Rev. No. 03, dated 01-Dec-2021). This checklist will be maintained by the Sustainability Coordinator and verified by respective operating unit manager. Latest was conducted in Nov-2023.</p>										
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit at estates. Apart from that, erection of concrete slab with GPS coordinate along the boundaries was also commonly practiced and clearly visible. Boundary and monthly patrolling record was verified.</p> <table border="1" data-bbox="1137 1225 1926 1394"> <thead> <tr> <th>Estate</th> <th>Field/Block</th> <th>Neighbouring to:</th> </tr> </thead> <tbody> <tr> <td>Mamor Estate</td> <td>PR22A</td> <td>Kekayaan Estate</td> </tr> <tr> <td>Mamor Estate</td> <td>PR23B</td> <td>Conservation Area</td> </tr> </tbody> </table>	Estate	Field/Block	Neighbouring to:	Mamor Estate	PR22A	Kekayaan Estate	Mamor Estate	PR23B	Conservation Area	<p>Complied</p>
Estate	Field/Block	Neighbouring to:										
Mamor Estate	PR22A	Kekayaan Estate										
Mamor Estate	PR23B	Conservation Area										

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		Swee lam Estate	P07D	Kelan Estate		
		Swee Lam Estate	P10C	Smallholder (Farm)		
		IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate	P16J	Pakloh Estate		
		IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate	P12E	Smallholder		
		<p>IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate and Pamol Timur Estate have practice mechanism to ensure the separation between organic and non-organic farm. Details as below:</p> <ol style="list-style-type: none"> 1. Buffer Zone for Non-Organic To Organic (2 rows Palm from the roadside). 2. Buffer zone with 9 meters from the government roadside. 3. Buffer zone for non-organic to organic (2rows palm from the smallholders). <p>All sampled contractors signed Additional Requirements for Contractors and Service Providers which states that they are aware and comply with applicable local, national and ratified international laws and regulations, not engage in child, forced or trafficked labour. In addition, the contractors also signed IOI's Supplier Code of Conduct to ensure compliance with anti-bribery and anti-corruption, ensure workers have valid passports and work permits, and not engage in child and trafficked labour.</p>				

		Based on documentation review, interviews and observations, no young workers were employed.	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	A list of contracted parties is maintained by each operating units. Sampled and verified during the surveillance audit were the following contractors: Mamor Estate: <ul style="list-style-type: none"> Sinar YSM Enterprise (domestic waste transporter) Sasaran Emas PLT (FFB transporter) Sakthi Enterprise (JCB contractor) Swee Lam Estate: <ul style="list-style-type: none"> Sasaran Perentas Sdn Bhd (FFB transporter) IOI Organic Oil (M) Pamol Barat Estate: Sasaran Emas PLT (FFB transporter) IOI Organic Oil (M) Pamol Timur Estate <ul style="list-style-type: none"> Jayakumar Maju Jaya Enterprise (FFB transporter) 	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Based on the sampled contracts which were reviewed and verified during the surveillance audit, Pamol Kluang Mill and its supply base were able to demonstrate that all contracts contain specific clause on meeting legal requirements. The relevant clause exists under Additional Requirements for Contractors and Service Providers which states that the contractors are aware of and comply with applicable local, national and ratified international laws and regulations, and not engage in child, forced or trafficked labour. In addition, contractors also signed supplier code of conduct committing to compliance with anti-bribery and anti-corruption	Non-compliance

		<p>laws, ensuring valid passports and work permits for their foreign workers.</p> <p>The sampled contractors were:</p> <ol style="list-style-type: none"> a. Pamol Plantations Sdn Bhd with Sasaran Emas PLT (for IOI Organic Oil (M) Pamol Barat Estate) valid from 1/7/2022 – 30/8/2025 (FFB transport) b. Pamol Plantations Sdn Bhd with Jayakumar Maju Jaya Enterprise (for IOI Organic Oil (M) Pamol Timur Estate) valid from 1/7/2023 – 30/6/2024 for loading and transport FFB from Pamol Timur Field to Pamol Kluang Mill. c. Pamol Plantations Sdn Bhd with Sinar YSM Enterprise (for Mamor Estate), valid from 1/7/2023 – 30/6/2024 (for bin rental for domestic waste) d. Pamol Plantations Sdn Bhd and Sakhti Enterprise (for Mamor Estate) valid from 1/7/2023 to 30/6/2023 (JCB rental). e. Pamol Plantations Sdn Bhd and Sasaran Perentas Sdn Bhd (for Swee Lam Estate) effective from 1/9/2022 to 31/8/2025 (for FFB transportation). <p>However, during the audit, it was found that Contractors Sasaran Perentas Sdn Bhd, Sasaran Emas PLT and Sinar YSM Enterprise were not able to demonstrate that they have met applicable legal requirements as below.</p> <ol style="list-style-type: none"> 1. Sasaran Perentas Sdn Bhd entered into a FFB transportation agreement with IOI Plantation Services Sdn Bhd (Swee Lam Estate) which commenced from 1/9/2022 to 31/8/2025. Sasaran Perentas assigned its obligations under the contract to Sasaran Emas PLT without the written consent of IOI Plantations. This is not in accordance with Clause 2n) of the Agreement signed between the parties. 	
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		<p>2. Sasaran Emas PLT had entered into employment contract with its following workers:</p> <ul style="list-style-type: none"> • Worker IC No. 700525-01-xxx on 7/9/2021 (Swee Lam Estate) • Worker IC No 720127-06-xxx on 9/9/2021 (Swee Lam Estate) • Worker IC No. 750517-01-xxx on 20/11/2022 (Kluang Pamol Mill) • Worker IC No. 580831-01-xxxx on 13/9/2021 (Kluang Pamol Mill) <p>All the above employment contracts mentioned that the workers' salary rate as "20% (Kargo), 17% (Tangki Minyak)". It does not clearly specify the actual rates for salary calculation. This is not in accordance with Section 30 of Contracts Act 1950 which states that agreements with uncertain meaning or capable of being made certain, are void.</p> <p>3. Sinar YSM Enterprise (domestic waste transporter at Mamor Estate) did not accurately deduct its workers' SOCSO contributions in accordance with the quantum prescribed under the SOCSO Act. Worker IC No. 951128-01-xxxx earned RM1,500 wages for July and August 2023. SOCSO deductions made for both months were RM8.75, whereas the legal deduction should be RM7.25 per month.</p> <p>Therefore, a Minor Non-Compliance was raised.</p>	
2.2.3	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.	All sampled contractors signed Additional Requirements for Contractors and Service Providers which states that they are aware and comply with applicable local, national and ratified international laws and regulations, not engage in child, forced or trafficked	Complied

	- Minor compliance -	labour. In addition, the contractors also signed IOI's Supplier Code of Conduct to ensure compliance with anti-bribery and anti-corruption, ensure workers have valid passports and work permits, and not engage in child and trafficked labour. Based on documentation review, interviews and observations, no young workers were employed.	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
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>	The Pamol Kluang POM processes only FFB from its own group of estates and does not source FFB from other third parties. Information on geo location of FFB Origin was referred to table 4. Evidence of the ownership was based on land title in the estate. All MPOB Licence was valid as per 2.1.1.	Complied
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 Indicator2.3.1.</p> <p>- Minor compliance -</p>	The Pamol Kluang POM processes only FFB from its own group of estates and does not source FFB from other third parties either directly or indirectly. Therefore, this indicator is not applicable	Not Applicable
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
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>	Mill and Estate has established business plan for their commitment to long term sustainability and improvements through a capital	Complied

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	<p>- Critical (Major) compliance -</p>	<p>expenditure programme. Refer 5 years Business plan dated 04/08/2023 for Pamol Kluang POM, the main component were:</p> <ol style="list-style-type: none"> 1. Crop Projection by estates 2. General Cost (Cost of supervision) 3. Cost of labour 4. Cost of others 5. Cost of RSPO 6. General charges 7. Manufacture cost 8. Dispatch cost 9. Processing cost 10. Cost per MT / FFB 11. Cost per MT / Palm Product <p>For Sample Estates, refer 5 Years Business Plan dated 01/07/2023. The main component were:</p> <ol style="list-style-type: none"> 1. Area statement 2. Crop (FFB) By year of planting 3. Crop (FFB) Monthly Breakdown 4. 10 years Replanting Programme 5. Summary Replanting Programme by field 6. Detail Replanting Programme by field 7. Executive / Staff and Workers requirement 	
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		<p>8. Mature oil Palm Costing Statement 9. General Charges Statement 10. Capital Expenditure Statement Summary Replanting Cost</p>																																				
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>The replanting programs from 2023 to 2028 was verified estates. This program is reviewed once a year (latest being Jan 2023) and is incorporated in their annual financial budget. The replanting program until year FY2027/2028 is as follows: All figures in ha otherwise stated.</p> <table border="1" data-bbox="1137 743 1935 1347"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="5">Replanting Program, Ha, For the Year</th> </tr> <tr> <th>2023 /2024</th> <th>2024 /2025</th> <th>2025 /2026</th> <th>2026 /2027</th> <th>2027 /2028</th> </tr> </thead> <tbody> <tr> <td>Mamor Estate</td> <td>187.00</td> <td>196.00</td> <td>190.00</td> <td>0.00</td> <td>199.00</td> </tr> <tr> <td>Swee Lam Estate</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>	Estate	Replanting Program, Ha, For the Year					2023 /2024	2024 /2025	2025 /2026	2026 /2027	2027 /2028	Mamor Estate	187.00	196.00	190.00	0.00	199.00	Swee Lam Estate	0.00	0.00	0.00	0.00	0.00	IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate	0.00	0.00	0.00	0.00	0.00	IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate	0.00	0.00	0.00	0.00	0.00	<p>Complied</p>
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>IOI Pamol Operating Units held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</p> <ol style="list-style-type: none"> 1. Welcoming speech 2. Explanation on RSPO and MSPO Standard requirements by Sustainability units 3. Discussion on summary issues internal audit RSPO and MSPO Findings 4. Discussion on the findings from previous year RSPO and MSPO External Audit 5. Status of corrections and corrective action 6. Performance review of Mill and Estate and Customer feedback 7. Discussion on recent RSPO and MSPO external audit findings 8. Complaint and Grievances 9. Other matters <p>The minutes of meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p> <ol style="list-style-type: none"> 1. Mamor Estate: 26/10/2023 2. Swee Lam Estate: 26/10/2023 3. Pamol Kluang POM: 26/10/2023 4. IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate: 26/10/2023 5. IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate: 26/10/2023 	<p>Complied</p>
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<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>		
<p>3.2.1</p>	<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 operating units has established Continuous Improvement Plan FY 2022/2023. Social and environmental were among pertinent elements covered in the action plan. On top of the established plan, allocation of capital expenditure (CAPEX) for process improvement, social and environmental components were also sighted. The plan cover the aspect of environmental, social, safety and operations. Among the improvement plan established as follows:</p> <p>Mamor Estate</p> <ol style="list-style-type: none"> 1. Mechanisation assisted field amounted RMXXX,XXX.XX 2. Resurface, grading and compacting main road amounted RMXXX,XXX.XX 3. Changing 10,000 gallon water tank due to leakage and rusty amounted RMXX,XXX.XX <p>Swee Lam Estate</p> <ol style="list-style-type: none"> 1. Replacement and Provide amenities amounted RMX,XXX.XX 2. Provide basic amenities for workers amounted RMXX,XXX.XX 3. Mechanical Cart Manual Dumper amounted RMXX,XXX.XX 4. Road Surfacing, Maintenance amounted RMXXX,XXX.XX <p>Pamol Kluang POM</p> <ol style="list-style-type: none"> 1. To install solar poles to light up the mill compound at night and reducing carbon value amounted RM XX,XXX.XX

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		<ol style="list-style-type: none"> 2. Repairing house roof that leakage during rainy season amounted RM XX,XXX.XX 3. To install pipelines and cabling work biogas engine system amounted RMX,XXX,XXX.XX 4. To install gas engine to utilize methane gas for electric production c/w complete installation amounted RMX,XXX,XXX.XX <p>IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate</p> <ol style="list-style-type: none"> 1. Tractor 90HP c/w Front Loade for Organic farm amounted RMXXX,XXX.XX 2. Change roofing for Organic Store amounted RMXX,XXX.XX 3. Change roofing for workers quarters amounted RMXX,XXX.XX <p>IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate</p> <ol style="list-style-type: none"> 1. Tractor 90HP c/w Front Loade for Organic farm amounted RMXXX,XXX.XX 2. Grass Cutter (Stihl) for maintenance circle palm amounted RMX,XXX.XX 	
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>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p>	<p>The UoC submitted RSPO P&C Metrics prior to the audit, using the updated Version 2.1 (June 2021) template. The information provided in the template accurately reflects the operations of each unit within Pamol Kluang POM & Supply Bases.</p> <p>Furthermore, the Annual Communication of Progress (ACOP) reporting for the year 2022 has been submitted to the RSPO ACOP Team. This demonstrates the company's commitment to</p>	Complied

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	<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>transparently communicate its progress and achievements in adhering to RSPO standards.</p> <p>In addition, the PalmGHG data for this unit of certification (UoC) has been submitted to the Certification Body (CB) before the audit was conducted. Following an on-site verification by the CB using PalmGHG Version 4, the data was approved. This indicates that the company has diligently complied with the reporting requirements and provided accurate and reliable data related to greenhouse gas emissions from its palm oil operations.</p> <p>RSPO Metric has included with information of additional organics units (IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate and IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate). The total number of workers, man days, accidents record and number of trainings have the same value due to the organics units utilise the same worker as the normal operation of the Pamol Barat Estate and Pamol Timur Estate respectively.</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>Documents on SOP had been maintained by each operating unit of Pamol Kluang POM & Supply Bases which were verified to be in order.</p> <p>POM has documented SOPs for its operations. The procedures included the following:</p> <p>(1) Group Standard Operating Procedures for Palm Oil Mill (Revised in Year 2017) – FFB Reception, FFB Handling, Sterilizer, Threshing, Digestion and Pressing, Oil Room, Depericarper, Nut and Kernel Plant, Products Storage and Despatch, Laboratory, Effluent Treatment Plant, Biogas Plant,</p>	<p>Complied</p>

		<p>Water Treatment Plant, Boiler, Engine Room, Workshop, and Shovel.</p> <p>This was revised i.e., Doc No IOI/StOP/A on 01 July 2017 (Issue 02).</p> <p>(2) Quality, Environmental and Occupational Health & Safety Manual and Procedures of Palm Oil Mill - The SOP for pollution prevention includes measuring and monitoring mill effluents and waste disposal / recycling.</p> <p>(3) Procedure for Safe Work and Management of Safety and Health for Workers - The SOP for safe working practices in the POM includes hazards identification, risk Audit and control measures. The hazards include noise, chemicals, heat, fire, fuel spillage, working at heights, working in enclosed space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc. and "permit to work system" for the mill.</p> <p>(4) SOP for Supply Chain documented as RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP), (RSPOSC/SOP /IP/3, Revision 07, dated 21 Sept 2020),</p> <p>The estates have the following SOPs:</p> <p>(1) Standard Operating Procedures (SOP) for Estate Operations (Revised in Year 2020) – Planting Density, Nursery, Land Clearing and Preparation, Planting Technique, Tidal Gates, Manuring, Pest, and Disease, Harvesting, Weedings, Road Maintenance, Workshop, Buffalo Healthcare, Foliar Sampling and Soil Sampling, Management and Monitoring of Existing Cultivation of Oil Palm on Peat</p>	
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		<p>(2) Safe Operating Procedures (SaOP) latest revised on 15/12/2020.</p> <p>Relevant Key Performance Indicators (KPIs) specified for quality, environment, safety and cost control at POM and Estates.</p> <p>In order to provide comprehensive guidance to all factory workers involved in handling organic products, the management has implemented specific working instructions. These instructions have been meticulously prepared and are titled "Organic CPO Processing" (Document Reference: IOI-ORGANIC-CPO-01, dated 01-Jul-2023) and "Organic PK Processing" (Document Reference: IOI-ORGANIC-PK-01, dated 01-Aug-2023). Both sets of instructions offer detailed guidance on the entire process of handling organic products, starting from the reception of Fresh Fruit Bunches (FFB) at the weighbridge station to the storage of Crude Palm Oil (CPO) in tanks, storage of Palm Kernel (PK) in silos, and the subsequent delivery of CPO and PK to the refinery.</p> <p>To ensure the implementation of organic palm oil production in accordance with established standards, the company has adopted an Organic System Plan (OSP) with the document reference IOI/OSP/OF, dated July 2021. This plan serves as a guide for the implementation of organic palm oil production, aligning with the principles outlined in Article 3 of Regulation EC No. 837/2007 and the National Organic Program (NOP Part 205). It is noteworthy that EC No. 837/2007 has been upgraded to Regulation EU 2018/848, set to be effective in 2025.</p> <p>The Organic System Plan includes a comprehensive set of guidelines covering various aspects of organic palm oil production. The key principles encompass general farm production rules, individual field coordination, field practices (addressing aspects such as pest and diseases, organic fertilizer use, field maintenance,</p>	
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		<p>harvesting, collection, and transportation to the mill), planting material management, soil fertility and nutrient practices (utilizing Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), boiler ash, fronds stacking), crop rotation, weeding procedures, plant protection measures (including control measures for Ganoderma stem rot disease, biological control methods, rhinoceros beetle control, rodent control, and the use of beneficial plants).</p> <p>This meticulous planning and adherence to organic farming principles, as outlined in the working instructions and the Organic System Plan, demonstrate the company's commitment to maintaining the integrity and quality of organic palm oil production. The incorporation of these guidelines ensures that the entire production process complies with regulatory standards, fostering sustainable and organic practices within the organization.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The implementation of the SOPs was verified to be consistently performed. Records of implementation were verified, including system monitoring via internal audits and operational activities, i.e., daily, weekly, and monthly field inspections. Verified that the monitoring was done by trained and competent personnel, e.g., Sustainability Department of Peninsular Region (for internal audits), Mill Manager, Assistant Mill Managers, Supervisors (Mill operations), and Estate Managers, Assistant Managers, Field Supervisors and experienced Mandores (for field operations). Records had been maintained by the staff concerned for each operation to monitor the procedure and progress of work, and these records would be checked and verified by the Assistant Manager and the Manager regularly. Estate and mill management also adopt practices such as visits from top management, i.e., Plantation Director, Plantation Controller, Mill Controller, and Top Management visits and visits from government agencies (mainly</p>	Complied

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		<p>JTK, DOSH and DOE), to ensure consistent implementation of procedures.</p> <p>RSPO P&C Internal Audit was conducted at Pamol Kluang POM on 09-Oct-2023, at Mamor Estate on 11-Oct-2023, at Swee Lam Estate on 18-Oct-2023, at Pamol Barat (including IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate) on 19-Oct-2023, and Pamol Timur (including IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate) on 10-Oct-2023. The internal audit was conducted by Sustainability Department of Peninsular Region. Evident in the Internal Audit Report prepared by Sustainability Department (Peninsular Region) using RSPO MYNI Revised April 2022 IA Checklist (Ver 02_05.12.2020_SPO that there are 2 NCs raised at Pamol Kluang POM, 1 NC raised at Mamor Estate, 2 NCs raised at Swee Lam Estate, 2 NCs raised at Pamol Barat Estate, and 2 NCs raised at Pamol Timur Estate. Audit results were evaluated, and adequate corrective actions were taken on the non-conformances. The internal audit report is available at each operating unit and available for review (upon request). From the minutes of Management Review Meeting, verified that the internal audit is part of the discussed topics.</p> <p>Apart from RSPO Internal Audit, there are also Group Internal Audit conducted by the Internal Audit Department, with latest was conducted in Q1 of 2023 for the grouping.</p> <p>Environmental Audit at Pamol Kluang POM conducted biannually by 3rd Party Auditors in compliance with DOE – Compliance Schedule. Recently conducted Environmental Audit on 18/08/2022.</p> <p>Safety, Health & Environment Department also conducted the Internal Audit at each operating unit as latest was conducted at the grouping in Oct-2023.</p>	
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		<p>The audit report was documented and made available during the audit and to the management for their review. Overall, the mechanism to check consistent implementation of procedures at Pamol Kluang POM & Supply Bases are effectively implemented.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Records of monitoring and actions taken had been maintained for more than 12 months at the mill and estates.</p> <p>Daily Muster chits and briefing records were available at POM and estates.</p> <p>Actual operational and field activities were verified during on-site field inspection at the POM and estates audited.</p> <p>Verified that estates monitoring records on spraying, manuring, and harvesting operations, and mill monitoring records on daily production report (FFB processed/Ramp balance, throughput/starting & stopping time, and boiler monitoring sheet), Daily notification report (machinery status), Daily supervision and walkabouts by Supervisor and Assistant Managers were maintained and available during the assessment at the estates and mill.</p> <p>Reports of top management and government agencies visits also maintained by estates and mill management accordingly.</p> <p>Evident from the Management Review Meeting minutes which is properly maintained that the input from the internal audit findings were discussed as to identify the effectiveness of the implementation of the RSPO P&C requirement.</p> <p>The on-site audit confirmed that the records were satisfactorily maintained.</p>	<p>Complied</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>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There are no new plantings or new operations within Pamol Kluang POM Certification Unit. Nevertheless, each unit has its own Social and Environmental Impact Assessments prepared internally by the Sustainability Department. Environmental Impact Assessment – Management Plans and Continuous Improvement Plans have been established by the mill and estates and are subject to periodic reviews in the event of new legislation enforced by National State laws or in the event of any new cost-effective technology development in the sites. The EIA is available for verification at every site that was sampled.</p> <p>There is no new planting within any of the units under Pamol Kluang Mill and its supply base. However, a Social Impact Assessment Management Action Plans & Continuous Improvement Plans were developed for each operating unit by the Sustainability Department team in collaboration with the respective managers and assistant managers. These assessments were undertaken with the participation of affected stakeholders. Please see Indicators 3.4.2 and 3.4.3 below.</p>	<p>Complied</p>
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Management plan has been established in the Environmental Impact Assessment (Management Action Plans & Continuous Improvement Plan). All issue raised related environmental that gained during communication with affected stakeholder has been included in the management plan. Review has been made by Sustainability units as below:</p> <p>Mamor Estate: 12/11/2023 Swee Lam Estate: 12/11/2023</p>	<p>Complied</p>

		<p>Pamol Kluang POM: 27/11/2023 IOI Organic Pamol Timur: 12/11/2023 IOI Organic Pamol Barat: 12/11/2023</p> <p>Among the plan detailed in the management plan was discussed on:</p> <p>Mamor Estate and Swee Lam Estate</p> <ol style="list-style-type: none"> 1. Spent oil/ Lubricant / Empty Lubricant Container and Empty Chemical Container 2. Schedule waste store / Empty Chemical Container Store 3. Domestic & Recyclable Waste, Sewage and Garden Residue 4. Clinic 5. Line site 6. Diesel / Lubricant Store 7. Electricity and Office paper Usage 8. Pesticide store / Premixing area / spraying activity /Emergency Shower 9. Emergency Eyewash 10. Workshop / vehicle bay and etc. <p>Pamol Kluang POM</p> <ol style="list-style-type: none"> 1. Washing of floor lubricant, CPO from Marshalling Yards. 2. Smoke Emission 3. Noise Pollution 	
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		<ol style="list-style-type: none"> 4. Disposals od spent oil/ lubricants and Empty chemical container 5. Clinical waste 6. Schedule waste store 7. Efficient usage of electricity and office papers 8. Workshop 9. Laboratory 10. Boiler and etc. <p>IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate and Pamol Timur Estate</p> <ol style="list-style-type: none"> 1. Grass cutting 2. Harvesting 3. Dog Hunting 4. Buffalo grazing 5. EFB Application 6. Roto slasher 7. Organic General store <p>Potential Environmental Impacts has been detailed for the positive and negative impacts. Action plan and monitoring plan has been prepared with several mechanism detailed. Monitoring document for example checklist and record has been used.</p> <p>Evidence was available that each operating unit had developed their own SIA assessment and monitoring plans with the participation of affected stakeholders. The stakeholders included</p>	
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		<p>workers, management team, worker representative units such ECC, JCC, WEC, as well as feedback received from external and internal stakeholder meetings. Social issues raised during all these meetings were captured into the respective SIA Management Action Plans.</p> <p>Sampled during the surveillance audit were the following:</p> <ul style="list-style-type: none"> - Mamor Estate internal stakeholder meeting on 11/10/2023; - Mamor Estate JCC meetings on 26/10/2023, 24/8/2023 and 24/6/2023 where issues such as leaky tractor roof, need for more rest huts in the field, blocked drains at the workers' housing; - Mamor Estate WEC meeting on 12/6/2023 on issues of lorries not adhering to speed limits and mosquitos. - Swee Lam Estate internal and external stakeholder meetings held on 21/9/2023 which identified positive treatment of employers; - Swee Lam Estate WEC meeting on 15/9/2023 - IOI Organic Oil (M) Pamol Timur Estate JCC meeting on 27/10/2023 raised issue of slippery and dangerous road to the housing area. - IOI Organic Oil (M) Pamol Barat Estate positive comment received was the elimination of the use of chemical, and conversely, the negative impact was more difficult to harvest because the field is not sprayed & grass is high. <p>Based on the above, Pamol Kluang Mill and its supply base were able to demonstrate that the SIA and monitoring planes have been developed with participation of affected stakeholders.</p>	
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3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The social and environmental management plan has been implemented as per detailed in the Monitoring document. Reviewed of Management plan has been done as per 3.4.2 and updated regularly in a participatory way. The input was gained during internal meeting such as OSH meeting and External stakeholder meeting.</p> <p>The SIA and monitoring plans were implemented and reviewed in a participatory way as described under Indicator 3.4.2 above.</p> <p>Based on records available, the reviews were held once a year. The latest reviews sampled were:</p> <p>Mamor Estate: 26/10/2023.</p> <p>Swee Lam Estate: 24/10/2023</p> <p>Pamol Kluang Palm Oil Mill: 19/10/2023</p>	Complied
Criterion 3.5: A system for managing human resources is in place.			
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>Pamol Kluang Mill and its supply base were able to demonstrate that employment procedures for recruitment, selection, hiring promotion, retirement and termination were documented. This was available under document titled SOP Employment Procedures For Workers (Recruitment Selection and Hiring). The SOP was briefed to the workers and their contractors during stakeholder meeting, and during muster briefings. Sampled were briefings given as follows:</p> <ul style="list-style-type: none"> - Swee Lam Estate on 25/10/2023 - IOI Organic Oil (M) Pamol Barat Estate on 24/2/2023 - IOI Organic Oil (M) Pamol Timur Estate on 29/8/2023 	Complied

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		<ul style="list-style-type: none"> - Mamor Estate on 15/3/2023 - Pamol Kluang POM on 21/8/2023 	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <ul style="list-style-type: none"> - Minor Compliance - 	<p>Based on the workers’ personal files, evidence was available that the employment procedures for local and migrant workers are being implemented, and records of employment maintained. Sighted during the audit were job application forms, relevant qualifications and certificates, job interview, records of medical check-up, and the issuance of letter of job offer. There was also evidence of medical examination, certificate of fitness for new recruitment, signing of employment contracts, and record of induction training attended. Sighted induction training at Mamor estate (16/10/2023) and Swee Lam Estate (18/9/2023)</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p><u>Hazard Identification, Risk Assessment and Risk Control (HIRARC):</u></p> <p>The HIRARC for each operating unit of the UoC was established by referring to the SOP: Penaksiran Risiko (Doc. No. IOI.MILL/EST. JHA, Rev. B, dated 03-Jan-2023), with the rating of Risk Level are based on Likelihood and Severity.</p> <p>Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/chemicals, accident, fire, fuel spillage, working at heights, working in enclosed space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc. and “Permit to Work System” for the mill.</p>	Complied

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		<p>Verified that additional HIRARC reviews also made by the Safety & Health team upon occurrence of incidences or accidents. The latest review was done on 03-Jan-2023 for each operating unit. Sample for list register for HIRARC had been verified for activity at loading ramp, sterilizer, oil room, boiler, workshop, store area, land irrigation, P&D, pruning, spraying, tractor driving, buffer zone, harvesting.</p> <p>Evident from the HIRARC established that the POM and estate management adequately assessed the HIRARC.</p> <p><u>Chemical Hazard and Risk Assessment (CHRA):</u></p> <p>A Chemical Hazard and Risk Assessment (CHRA) was undertaken at Pamol Kluang POM under the auspices of HQ/04/ASS/00/193, with a report reference number of HQ/04/ASS/00/193-2019/043, dated 19/04/2019. The Mill Management has established a CHRA Management Plan based on the recommendations outlined in the report. After on-site visits, documentation reviews, and interviews, it has been ascertained that the management plan is being effectively implemented.</p> <p>Moreover, a Periodic Inspection, Testing & Examination Of Engineering Control (LEV) took place in July 2023, documented under report reference number HT(II)-J/23-07/03. Monthly inspections are consistently conducted to ensure the reliability of the system in capturing and containing the containment air from the hood. The latest inspection occurred in October 2023.</p> <p>Similar CHRA assessments were conducted at Mamor Estate and Swee Lam Estate, both covered by HQ/04/ASS/00/193. The respective reports, HQ/04/ASS/00/193-2019/003 dated 13-Apr-2019 for Mamor Estate and HQ/04/ASS/00/193-2019/016 dated 20-Apr-2019 for Swee Lam Estate, prompted the establishment of</p>	
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		<p>CHRA Management Plans by their respective Estate Managements. Verification through site visits, documentation reviews, and interviews confirmed the effective implementation of these plans.</p> <p>However, no CHRA assessments were conducted for IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate and IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate due to the absence of chemical usage in their operations.</p> <p><u>Noise Risk Assessment:</u></p> <p>A comprehensive NRA was conducted at Pamol Kluang POM by HQ/16/PEB/00/158, as evidenced by report reference numbers HQ/LPROYKPEB/20/00158 dated 13/05/2022 and HQ/LPROYKPEB/21/00602 dated 21/10/2021 (specifically for Biogas). The Mill Management has formulated an NRA Management Plan based on the recommendations derived from these reports. The effective implementation of this plan has been verified through site visits, documentation reviews, and interviews.</p> <p>Similar NRA assessments were conducted at Mamor Estate and Swee Lam Estate, both covered by HQ/16/PEB/00/158. The respective reports, HQ/LPROYKPEB/22/00728 dated 14/07/2022 for Mamor Estate and HQ/LPROYKPEB/20/00153 dated 11-Jul-2020 for Swee Lam Estate, resulted in the establishment of NRA Management Plans by their respective Estate Managements. The implementation of these plans was duly confirmed through rigorous site inspections, documentation reviews, and interviews.</p> <p>Additionally, IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate underwent NRA assessments covered by report reference numbers HQ/LPROYKPEB/20/00171 dated 11-Aug-2020 and HQ/LPROYKPEB/22/00725 dated 04-May-2022. The Estate Management has established an NRA Management Plan based on the</p>	
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		<p>recommendations from these reports, and its effective implementation has been verified through thorough site visits, documentation reviews, and interviews.</p> <p>Similarly, IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate underwent NRA assessments covered by report reference numbers HQ/LPROYKPEB/20/00208 dated 20-Jul-2020 and HQ/LPROYKPEB/22/00724 dated 19-May-2022. The Estate Management has established an NRA Management Plan based on the recommendations from these reports, and its effective implementation has been verified through thorough site visits, documentation reviews, and interviews.</p> <p>Audiometric tests were conducted for relevant workers from each operating unit based on NRA recommendations in July 2023. All tested workers were informed of their results, and no further action was required for those with normal hearing. For workers with abnormal hearing, each operating unit's management has taken necessary actions, including examination by the Occupational Health Doctor (OHD), repeat tests within three months, ongoing annual training, Personal Hearing Protection (PHP) usage, etc.</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>- Critical (Major) compliance -</p>	<p>The Safety and Health Management Plans for the POM and estates, dated Jan-2022, have been established. Furthermore, an Occupational Safety and Health (OSH) Plan covering the period from July 2020 to July 2025 has been methodically prepared and consistently verified. The most recent review took place in November 2023 for each operating unit. The comprehensive OSH Plan includes the following key components:</p> <ul style="list-style-type: none"> Occupational Safety and Health Policy: The Occupational Health and Safety Policy underwent revision by the Plantation Director in January 2023. 	OFI

		<ul style="list-style-type: none"> • Occupational Safety and Health Committee • Emergency Response Plan • Occupational Safety and Health Training: <ul style="list-style-type: none"> - Training initiatives related to safety and health have been diligently conducted in accordance with the established plan. - Training needs analyses have been documented and systematically monitored to ensure alignment with evolving requirements. • Accident Reporting and Investigation Procedures • Hazard Identification, Risk Assessment, and Risk Control (HIRARC): <ul style="list-style-type: none"> - The effectiveness of HIRARC is rigorously monitored and assured through checklists and conducted training sessions. - Site visits across the mill and estates affirm that control measures stipulated in the HIRARC are consistently followed and overseen by respective managements. • Contractor Safety • Safety House Inspection • Performance Monitoring & Measurement • Personal Protective Equipment (PPE) <p>The proactive approach to safety and health training, along with the meticulous documentation and monitoring of training needs analyses, underscores the commitment to fostering a culture of</p>	
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		<p>safety within the organization. The efficacy of the HIRARC is continually assessed through a combination of checklists and targeted training sessions, ensuring its ongoing relevance and applicability.</p> <p>Regular site visits conducted around the mill and estates confirm the steadfast adherence to control measures outlined in the HIRARC, underscoring the commitment to safety by respective managements. Monthly Workplace Inspections, coupled with the discussion of findings during Quarterly OSH Meetings, exemplify the dedication to continuous improvement and the proactive identification of potential risks.</p> <p>As a result, the diligent monitoring and consistent implementation of the Health and Safety (H&S) plan demonstrate the UoC management's commitment to effectively addressing health and safety risks, thereby ensuring the well-being of all individuals within the operational environment.</p> <p>OFI has been raised against this indicator as details below:</p> <p>(1) Location: Pamol Kluang POM</p> <p>(a) The mill management plans to engage a JKPP-approved assessor to conduct the NRA (Additional) for the work units involving the grass cutter, silent room, effluent mono pump, and shovel driver. The proposal, referenced as PMM/ADD NRA/11/2023 dated 20-Nov-2023, was reviewed during the current audit. The assessment is expected to take place in Jan-2024. This will be follow-up during next audit.</p> <p>(b) The assessment of the appropriate type of fire extinguisher and the determination of its optimal location</p>	
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		<p>within the processing area of the palm oil mill could be improved.</p> <p>(2) Location: Mamor Estate</p> <p>The facility designated for workers to wash their PPE after work could benefit from improvements to align with the Ergonomics Plan as outlined in the Occupational Safety and Health (OSH) Plan 2023.</p> <p>(3) Location: IOI Organic Oil (M) Pamol Barat Estate</p> <p>The safety features for the stairs leading to the store area, specifically designated for storing materials used in the allocated organic area, can be enhanced.</p> <p>Thus, OFI was raised.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>A comprehensive training program has been established and is accessible through the Safety and Health Training Matrix and Training Need Analysis for the Year 2023/2024, specifically for Pamol Kluang POM and estates. The training plan has been thoughtfully subdivided into distinct categories, each addressing critical aspects of operational safety and health. These categories include:</p> <ul style="list-style-type: none"> • Environmental Training: focused on cultivating awareness and competence in environmental management practices. • GAP (Good Agricultural Practices) Training: geared towards instilling proficiency in adhering to recognized agricultural best practices. 	<p>Complied</p>

		<ul style="list-style-type: none"> • SOP (Standard Operating Procedures) Training: aimed at ensuring a thorough understanding and adherence to established operational protocols. • Social Training: Centered around fostering an understanding of and commitment to socially responsible practices within the organizational context. • Traceability Training: designed to enhance knowledge and skills in traceability measures and processes (FFB delivery from estates to the POM and CPO & PK delivery from POM to refineries). • Building & Structure Inspection Training: focuses on imparting the necessary expertise for the inspection and maintenance of buildings and structures within the operational landscape. • SUS Program Training: centers on Sustainable and Responsible Sourcing (SUS) practices, aligning with industry sustainability standards (RSPO/MSPO/ISCC). • Legal Program Training: addresses the legal aspects pertinent to the operations, ensuring compliance with relevant regulations and standards. <p>The categorization of the training plan allows for a targeted and systematic approach to workforce development, addressing specific facets essential to the overall safety and health framework. By subcategorizing into distinct thematic areas, the training program is not only comprehensive but also aligned with the diverse needs of the operational landscape, enhancing the effectiveness of skill acquisition and knowledge dissemination. This structured approach underscores the commitment to maintaining</p>	
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		<p>a safe, compliant, and socially responsible working environment within the Pamol Kluang POM and estates.</p>	
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>A comprehensive review of training records for staff and workers, included of new employees hired as of the audit date reveals a commendable commitment to training and development across all operating units. The records provide detailed insights into the training initiatives, with each record containing pertinent information such as the name of the training, date of the training, names of trainees, a list of employees trained, and a concise summary of the training. Sampled training records from each operating unit include:</p> <ul style="list-style-type: none"> • Pamol Kluang POM: First Aider (09/02/2023), PPE (01/02/2023), Chemical Store Management (07/07/2023), Chemical Handling & SDS (12/05/2023), Shovel Driver (20/05/2023), STOP Sterilization (14/10/2023), Disposal of Scheduled Wastes (31/07/2023), Payslip and Workers Work Verification (08/06/2023), Grievance Procedure (08/06/2023) • Mamor Estate: SaOP Chemical Store and Spill Kit (03/05/2023), Chemical Usage Training (15/11/2023), ERT/ERP (17/08/2023), Buffer Zone (03/05/2023), IPM – beneficial plants (02/08/2023), Land Clearing and Preparation (21/06/2023), First Aider (02/10/2023) • Swee Lam Estate: Emergency Response Plan (22/03/2023), Fire Drill (16/05/2023), First Aider (21/06/2023), Chemical Spraying SaOP (15/06/2023), SaOP Rat-baiting Application (01/11/2023), SaOP Management of Chemical Stores and Spill Kit (28/04/2023), IPM – Barn Owl Management (12/09/2023), Spraying Pump Calibration (19/10/2023), Sexual Harassment 	<p>Complied</p>

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		<p>(15/03/2023), Home Cleanliness (20/06/2023), Sustainability Awareness to Contractors (21/08/2023)</p> <ul style="list-style-type: none"> • IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate: IOI Group’s Policies (24/02/2023), Grievance Procedure (15/03/2023), Sexual Harassment Procedure (24/06/2023), Women Empowerment Committee Procedure (24/06/2023), ERP (02/09/2023), Fire Drill (02/09/2023), First Aid Kit (02/09/2023), Grabber (23/05/2023), IPM – Rat Hunting (14/04/2023), IPM – Barn Owl (30/03/2023), SaOP Grass Cutting (29/06/2023) • IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate: Safety Policy (21/08/2023), Sexual Harassment Procedure (28/09/2023), HCV Management (16/05/2023), IPM – Beneficial Plant (18/07/2023), Buffalo Assisted Harvesting (13/04/2023), Fire Preventing with Adjacent Stakeholders (04/10/2023), ERP & Fire Drill (31/07/2023), First Aid Kit (22/09/2023) <p>Overall, the conscientious approach to training underscores a steadfast commitment to maintaining a safe and well-prepared working environment within each operating unit.</p>	
<p>3.7.3</p>	<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 mill has diligently identified all pertinent personnel involved in the supply chain system, including key roles such as the Mill Manager, Assistant Mill Manager, Compliance Executive, Compliance Clerk, Laboratory Staff, Weighbridge Operator, Security, and Grader. To ensure the effective implementation of the Supply Chain Certification Standard, the identified personnel receive tailored training.</p> <p>Specifically, reference is made to the RSPO Supply Chain Training conducted on 19/09/2023, which involved 13 participants. This</p>	<p>Complied</p>

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		<p>training is designed to equip personnel with the knowledge and skills crucial for the successful implementation of the Supply Chain Certification Standard. Additionally, training for contractors was conducted on 04/10/2023, with 10 participants, further extending the reach of awareness and competence in adhering to supply chain standards. These efforts underscore the commitment to comprehensive training initiatives for individuals involved in the supply chain system.</p>	
<p>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)</p>			
<p>3.8.1</p>	<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>IOI Plantation has established SOP entitled RSPO Supply Chain – Identity Preserve as guidelines to adopt the Identity Preserve Module. Refer document no. RSPOSC/SOP/IP/3, rev. no. 11, dated 27/11/2023. The SOP covers:</p> <ol style="list-style-type: none"> 1. Purpose 2. Scope 3. Responsibilities 4. Reception of Raw Materials 5. Processing and Storage 6. Despatch of Mill Produce 7. Records and Retention 8. Training 9. Claims 10. Handling Complaints 	<p>Complied</p>

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		<p>11. Internal audit 12. Management review 13. IT Platform 14. Reference 15. List of Amendment 16. Attachment</p> <p>As per SOP under section 4. Reception of Raw Material stated as follows:</p> <p>"4.1.1 IOI RSPO certified Palm Oil Mills shall only receive crop exclusively from its own RSPO certified estates. The mill shall verify the FFB originates from certified estate. non-certified FFB crop must be rejected."</p> <p>The mill adopted the Identity Preserve Supply Chain Module. Verified during the audit, the mill only received FFB from RSPO certified source from the 8 Estates within the supply bases and diversion from other certified IOI Plantation Berhad estates.</p>	
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The mill adopted the Identity Preserve Supply Chain Module. Verified during the audit, the mill only received FFB from RSPO certified source from the 8 Estates within the supply bases and diversion from other certified IOI Plantation Berhad estates. Hence this indicator is not applicable.</p>	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</p>	<p>The public summary report includes the estimated tonnage of Crude Palm Oil (CPO) and Palm Kernel (PK) products that the certified mill has the potential to produce. The summary of CPO</p>	Complied

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	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.	and PK deliveries since the last audit is presented in Table 10 of the report. This table likely provides a detailed breakdown of the actual quantities of CPO and PK delivered by the mill since the last audit, offering a transparent overview of the production output during that period.											
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace.</p> <p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1"> <tr> <td>Palm Trace ID</td> <td>RSPO_PO1000000109</td> </tr> <tr> <td>Member name</td> <td>Pamol Plantation Sdn Bhd – Pamol Kluang Palm Oil Mill</td> </tr> <tr> <td>Licence status</td> <td>Active</td> </tr> <tr> <td>Validity</td> <td>16/04/2023 – 15/03/2024</td> </tr> <tr> <td>Supply Chain Model</td> <td>Identity Preserved</td> </tr> </table> <p>Reporting requirements for supply chain was verified through RSPO IT platform - Summary of transactions.</p>	Palm Trace ID	RSPO_PO1000000109	Member name	Pamol Plantation Sdn Bhd – Pamol Kluang Palm Oil Mill	Licence status	Active	Validity	16/04/2023 – 15/03/2024	Supply Chain Model	Identity Preserved	Complied
Palm Trace ID	RSPO_PO1000000109												
Member name	Pamol Plantation Sdn Bhd – Pamol Kluang Palm Oil Mill												
Licence status	Active												
Validity	16/04/2023 – 15/03/2024												
Supply Chain Model	Identity Preserved												
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>	IOI Plantation has established SOP entitled RSPO Supply Chain – Identity Preserve as guidelines to adopt the Identity Preserve Module. Refer document no. RSPOSC/SOP/IP/3, rev. no. 11, dated 27/11/2023. The SOP covers:	Complied										

<ul 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. 	<ol style="list-style-type: none"> 1. Purpose 2. Scope 3. Responsibilities 4. Reception of Raw Materials 5. Processing and Storage 6. Despatch of Mill Produce 7. Records and Retention 8. Training 9. Claims 10. Handling Complaints 11. Internal audit 12. Management review 13. IT Platform 14. Reference 15. List of Amendment 16. Attachment <p>For Internal Audit, IOI Plantation has updated Internal Audit Procedure. Refer document no. RSPOSC/SOP/1A/1, rev. no. 03, dated 31/07/2023.</p> <p>As per SOP established, 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</p>	
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		<p>Managers, Engineers and Technical Executives as per stated in its procedure.</p> <p>Pamol Kluang Palm Oil mill adopted the Identity Preserve Supply Chain Module. Verified during the audit, the mill only received RSPO certified FFB from the Supply Base (8 estates) and from other Certification Units under IOI Group. There was no third party's crop nor non-certified FFB received by the mill.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <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>	<p>For Internal Audit, IOI Plantation has updated Internal Audit Procedure. Refer document no. RSPOSC/SOP/1A/1, rev. no. 03, dated 31/07/2023.</p> <p>Latest Internal audit for RSPO Supply Chain of Custody and Supply Chain Certification was conducted on 09/10/2023 by SPO Department. There is no non-conformities were raised. If any non-conformities raised, all action related identification of root cause, correction and corrective action will be recorded by mill.</p>	Complied
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>Refer SOP entitled RSPO Supply Chain – Identity Preserve as guidelines to adopt the Identity Preserve Module. Refer document no. RSPOSC/SOP/IP/3, rev. no. 11, dated 27/11/2023. Under section 4 Reception of Raw Materials, stated as that all crop received must be accompanied by relevant documents such as the FFB despatch chits that clearly stated information as sighted in sampled as follows:</p>	Complied

	<p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Sample 1</p> <ul style="list-style-type: none"> • Estate: Organic Pamol Timur Estate • Date: 22/09/2023 • Receipt No: FB1906XXXX • Lorry No: BMHXXXX • Field No: PM12C • RSPO Cert. No.: RSPO547027 • Weight: 6.78 MT <p>Sample 2</p> <ul style="list-style-type: none"> • Estate: Pamol Barat Estate • Date: 29/09/2023 • Receipt No: FB1906XXXX • Lorry No: S1 • Field No: PM13C • RSPO Cert. No.: RSPO547027 • Weight: 11.18 MT <p>Sample 3</p> <ul style="list-style-type: none"> • Estate: Swee Lam Estate • Date: 31/07/2023 • Receipt No: FB1905XXXX • Lorry No: NBCXXXX 	
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		<ul style="list-style-type: none"> Field No: 92A, 00B, 13A RSPO Cert. No.: RSPO547027 Weight: 25.12 MT 	
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; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>As per SOP entitled RSPO Supply Chain – Identity Preserve as guidelines to adopt the Identity Preserve Module. Refer document no. RSPOSC/SOP/IP/3, rev. no. 11, dated 27/11/2023. Under section 6 Despatch of Mill Produce stated all despatch of CSPO and CSPK must be accompanied by relevant documents such as weighbridge tickets, delivery order, shipping documents etc. reviewed the sampled despatch records as follows:</p> <p>CPO</p> <p>Sample 1</p> <ol style="list-style-type: none"> Buyer Name: IOI Pan Century Edible Oils Seller Name: Pamol Kluang POM Loading/Delivery date: 08/09/2023 Document issue date: 08/09/2023 RSPO Certificate No: RSPO547027 Description of product: CSPO IP Quantity of product: 44.89 MT Transport Documentation: JRWXXXX Unique Identification No: CP1900XXXX <p>Sample 2</p> <ol style="list-style-type: none"> Buyer Name: IOI Pan Century Edible Oils 	Complied

		<p>b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 26/07/2023 d) Document issue date: 26/07/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPO IP g) Quantity of product: 41.41 MT h) Transport Documentation: JKFXXXX Unique Identification No: CP1900XXXX PK Sample 1 a) Buyer Name: XXX XXX Oil Mill Sdn Bhd b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 07/07/2023 d) Document issue date: 07/07/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPK IP g) Quantity of product: 36.32 MT h) Transport Documentation: SWFXXXX i) Unique Identification No: PK1900XXXX Sample 2 a) Buyer Name: XXX XXX Oil Mill Sdn Bhd</p>	
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		<ul style="list-style-type: none"> b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 13/09/2023 d) Document issue date: 13/09/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPK IP g) Quantity of product: 42.46 MT h) Transport Documentation: DAXXXX i) Unique Identification No: PK1900XXXX 	
<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. 	<p>The mill have updated procedure on handling, refer title SOP entitled RSPO Supply Chain – Identity Preserve as guidelines to adopt the Identity Preserve Module. Refer document no. RSPOSC/SOP/IP/3, rev. no. 11, dated 27/11/2023. Pamol Kluang POM has legal ownership of all CPO and PK Transport and has been detailed up in the procedure and contract agreement.</p> <p>Outsourcing only applicable for CPO and PK dispatch based on the delivered contract with buyers. Sighted the contract agreement as following;</p> <ul style="list-style-type: none"> i) Teo Tuan Kwee Sdn Bhd, Validity from 01/09/2021 until 30/06/2024: Agreement for Transport of CPO ii) Yewtan Enterprise Sd Bhd, Validity from 01/09/2021 until 30/06/2024: Agreement for Transport of CPO <p>PK transportation was assigned by buyer. Sighted evidence of documentation.</p>	<p>Complied</p>

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	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>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 in advance.</p>	<p>The transporter already sign the Transport Policy stated that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>Under addendum contract (additional requirements for contractors and service providers) and transport policy/guideline in handling of certified sustainable CPO and PK, it has stipulated the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p>	
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 mill has a record of all contact detail for transporter and updated in the stakeholder list.	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.	<p>The mill is aware that they are to inform he CB in advance if there are any new contractor used for the physical handling of RSPO certified palm products.</p> <p>Stated in the Transport Policy that the approved certification bodies of RSPO, ISCC and MSPO have the rights to audit the contractors from time to time (if necessary) and contractors/transporters shall provide unrestricted access to their respective operations, systems and information on their handling of IOI's Certified Sustainable Palm Oil as CSPO & Certified Sustainable Palm Kernel CSPK.</p>	Complied
3.8.12	<p>Record keeping</p> <p>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.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	Refer SOP entitled RSPO Supply Chain – Identity Preserve as guidelines to adopt the Identity Preserve Module. Refer document no. RSPOSC/SOP/IP/3, rev. no. 11, dated 27/11/2023. Pamol Kluang POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Complied

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	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>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.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>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.</p> <p>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.</p> <p>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 be sold before it is in stock).</p>	<p>i. All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible.</p> <p>ii. The retention period for maintaining the traceability records is 2 years as stated in the SOP entitled RSPO Supply Chain – Identity Preserve as guidelines to adopt the Identity Preserve Module. Refer document no. RSPOSC/SOP/IP/3, rev. no. 11, dated 27/11/2023.</p> <p>iii. 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 2022/2023”. 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> <p>iv. Not Applicable since the model use was IP</p>	
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>	<p>The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER. Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER is reported in Table 10 of this report.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>As per Mill monthly production records, Mill is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied
3.8.15	<p>Processing</p>	<p>Based on the announcement summary, all the registrations were found to be in order. No RSPO volume sold for other scheme. RSPO</p>	Complied

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	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.	certified volume only downgraded to conventional CPO/PK. Refer procedure on handling SOP entitled RSPO Supply Chain – Identity Preserve as guidelines to adopt the Identity Preserve Module. Refer document no. RSPOSC/SOP/IP/3, rev. no. 11, dated 27/11/2023. From the record verification no outsider FFB accepted in Pamol Kluang POM. The FFB source only from supply base and under parent company which is also certified estates.	
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>	<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 2022 until Oct 2023, there were 30 announcements for CPO and 40 announcements for PK made.</p> <p>Based on RSPO Palm Trace, there is no RSPO certified volumes sold under different scheme or as conventional.</p>	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>	<p>The RSPO (Roundtable on Sustainable Palm Oil) trademark was not utilized by the facility; however, the facility is cognizant of the requirements outlined in the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has successfully obtained a Trademark License from RSPO with the license number 2-0002-04-000-00 (IOI Corporation Berhad). This license is valid from 25/01/2022 until 24/01/2024 and has been officially issued by RSPO. This information signifies the facility's adherence to the standards set by RSPO in their market communications and the licensing agreement in place with IOI Corporation Berhad.</p>	Complied

General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a “non-product related” claim.	IOI Group has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e., https://www.ioigroup.com/sustainability/Set-Goals-and-Commitments	Complied
4.2	In corporate communications, a member is allowed to: <ul style="list-style-type: none"> A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member’s history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership 	From the IOI Group official website verified that the statement all is done accordingly the requirement.	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on desktop review, site visit and documentation review it is verified that the RSPO corporate logo is not use by the UoC.	Complied
4.4	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 palm oil products.	Based on desktop review, site visit and documentation review it is verified that the no such communication has been made by the UoC.	Complied
4.5	Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include: <ul style="list-style-type: none"> • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” 	Based on desktop review, site visit and documentation review it is verified that the no such communication has been made by the UoC.	Complied

	<ul style="list-style-type: none"> • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.” • “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.” • “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” • “We are RSPO certified. Ask us for our RSPO certified products.” 		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).” ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim. <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p>	<p>IOI Corporation Berhad is a member of the RSPO, holding membership number 2-0002-04-000-00. Additionally, Pamol Kluang POM & Supply Bases under the IOI Corporation Berhad have obtained RSPO P&C Certification with certificate number RSPO 547027.</p> <p>Given this RSPO certification status and membership, it is declared that this indicator is Not Applicable to this UoC.</p>	Complied
Product-specific communications			

5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	IOI Group has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e., https://www.ioigroup.com/sustainability/Set-Goals-and-Commitments . No packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. The product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews were made accordingly and as per requirements.	Complied
5.1.2	Product-specific communications are voluntary.	The product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews were made accordingly and as per requirements.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	No RSPO Label is use on the product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	No other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is use on the product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Complied
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders	Based on the registration at RSPO PalmTrace, the Type of Business of the UoC is Oil Mill. Therefore, this indicator is Not Applicable.	Not Applicable

	<p>or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. <p>Auditor notes: This requirement is not applicable if it is RSPO P&C and SCC audits</p>		
5.1.6	<p>Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain</p> <p>Auditor notes: This requirement is not applicable if it is RSPO P&C and SCC audits</p>	Based on the registration at RSPO PalmTrace, the Type of Business of the UoC is Oil Mill. Therefore, this indicator is Not Applicable.	Not Applicable
5.2 Off pack claims			

<p>5.2.1</p>	<p>Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.</p>	<p>IOI Group has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e., https://www.ioigroup.com/sustainability/Set-Goals-and-Commitments</p> <p>The product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews were made accordingly and as per requirements.</p> <p>No RSPO Label is use on the product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.</p> <p>Despatch of Mill Produce stated all despatch of CSPO and CSPK must be accompanied by relevant documents such as weighbridge tickets, delivery order, shipping documents etc. reviewed the sampled despatch records as follows:</p> <p>CPO</p> <p>Sample 1</p> <ul style="list-style-type: none"> a) Buyer Name: IOI Pan Century Edible Oils b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 08/09/2023 d) Document issue date: 08/09/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPO IP g) Quantity of product: 44.89 MT 	<p>Complied</p>
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		<p>h) Transport Documentation: JRWXXXX i) Unique Identification No: CP1900XXXX Sample 2 a) Buyer Name: IOI Pan Century Edible Oils b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 26/07/2023 d) Document issue date: 26/07/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPO IP g) Quantity of product: 41.41 MT h) Transport Documentation: JKFXXXX Unique Identification No: CP1900XXXX PK Sample 1 a) Buyer Name: XXX XXX Oil Mill Sdn Bhd b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 07/07/2023 d) Document issue date: 07/07/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPK IP g) Quantity of product: 36.32 MT</p>	
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		<ul style="list-style-type: none"> h) Transport Documentation: SWFXXXX i) Unique Identification No: PK1900XXXX <p>Sample 2</p> <ul style="list-style-type: none"> a) Buyer Name: XXX XXX Oil Mill Sdn Bhd b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 13/09/2023 d) Document issue date: 13/09/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPK IP g) Quantity of product: 42.46 MT h) Transport Documentation: DAXXXXX i) Unique Identification No: PK1900XXXX 	
5.2.2	<p>When confirming the sale of certified palm oil 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.</p>	<p>Each RSPO Shipping Announcement was performed accordingly by the Marketing Department.</p> <p>Despatch of Mill Produce stated all despatch of CSPO and CSPK must be accompanied by relevant documents such as weighbridge tickets, delivery order, shipping documents etc. reviewed the sampled despatch records as follows:</p> <p>CPO</p> <p>Sample 1</p> <ul style="list-style-type: none"> a) Buyer Name: IOI Pan Century Edible Oils b) Seller Name: Pamol Kluang POM 	Complied

		<p>c) Loading/Delivery date: 08/09/2023 d) Document issue date: 08/09/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPO IP g) Quantity of product: 44.89 MT h) Transport Documentation: JRWXXXX i) Unique Identification No: CP1900XXXX</p> <p>Sample 2</p> <p>a) Buyer Name: IOI Pan Century Edible Oils b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 26/07/2023 d) Document issue date: 26/07/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPO IP g) Quantity of product: 41.41 MT h) Transport Documentation: JKFXXXX Unique Identification No: CP1900XXXX</p> <p>PK</p> <p>Sample 1</p> <p>a) Buyer Name: XXX XXX Oil Mill Sdn Bhd b) Seller Name: Pamol Kluang POM</p>	
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		<p>c) Loading/Delivery date: 07/07/2023 d) Document issue date: 07/07/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPK IP g) Quantity of product: 36.32 MT h) Transport Documentation: SWFXXXX i) Unique Identification No: PK1900XXXX</p> <p>Sample 2</p> <p>a) Buyer Name: XXX XXX Oil Mill Sdn Bhd b) Seller Name: Pamol Kluang POM c) Loading/Delivery date: 13/09/2023 d) Document issue date: 13/09/2023 e) RSPO Certificate No: RSPO547027 f) Description of product: CSPK IP g) Quantity of product: 42.46 MT h) Transport Documentation: DAXXXXX i) Unique Identification No: PK1900XXXX</p>	
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product 	<p>Based on the registration at RSPO PalmTrace, the Type of Business of the UoC is Oil Mill. Therefore, this indicator is Not Applicable.</p>	Not Applicable

	<p>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 products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</p> <ul style="list-style-type: none"> • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	<p>There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.</p>	Not Applicable
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.</p>	Not Applicable
	<p>B) or Mass Balance (MB) Certified Products:</p>	<p>There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings</p>	Not Applicable

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	<ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant’s RSPO membership status.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable

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5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	<p>The POM only processed RSPO-certified FFB from eight (8) estates of the Pamol Kluang POM & Supply Bases i.e., Pamol Timur Estate, IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate, Pamol Barat Estate, IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate, Mamor Estate, Unijaya Estate, Kahang Estate, and Swee Lam Estate. All of these estates are certified against the RSPO Principles and Criteria (RSPO P&C) with Certificate No. RSPO 547027, valid until 15/03/2025.</p> <p>It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/ smallholders.</p> <p>Therefore, the palm oil content is 100% RSPO IP certified.</p>	Complied
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	The POM only processed RSPO-certified FFB from eight (8) estates of the Pamol Kluang POM & Supply Bases i.e., Pamol Timur Estate, IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate, Pamol Barat Estate, IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate, Mamor Estate, Unijaya Estate, Kahang Estate, and Swee Lam Estate. All	Complied

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		<p>of these estates are certified against the RSPO Principles and Criteria (RSPO P&C) with Certificate No. RSPO 547027, valid until 15/03/2025.</p> <p>It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/ smallholders.</p> <p>Therefore, the palm oil content is 100% RSPO IP certified.</p>	
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil 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 according to stringent environmental and social criteria. www.rspo.org 	<p>IOI Group has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e., https://www.ioigroup.com/sustainability/Set-Goals-and-Commitments</p> <p>The product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews were made accordingly and as per requirements.</p> <p>The messaging use on the product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews was made aligned with the requirement.</p> <p>Palm Oil Mill is producing crude palm product and does not involved in any "messaging". Therefore, this indicator was not applicable.</p>	<p>Not Applicable</p>
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p>	<p>IOI Group has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> • RSPO Trademark that includes the tag "CERTIFIED"; or • RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	<p>official website i.e., https://www.ioigroup.com/sustainability/Set-Goals-and-Commitments</p> <p>The product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews were made accordingly and as per requirements.</p> <p>No RSPO Label is use on the product-specific communications via shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.</p> <p>Palm Oil Mill is producing crude palm product and does not involved in any "messaging". Therefore, this indicator was not applicable.</p>	
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: 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>A Sustainable Palm Oil Policy which was revised in Oct 2020 was made available during this surveillance audit. It was signed by Dato' Lee Yeow Chor, Group Managing Director & Chief Executive Officer and Dr Surina Ismail. Among the commitments contained in the Policy include the commitment for human rights. A policy to respect human rights was included in the clause on prohibiting retaliation against Human Rights Defenders. The Policy was communicated to all levels of workforce during trainings as follows:</p> <ul style="list-style-type: none"> - Swee Lam Estate on 25/10/2023 - IOI Organic Oil (M) Pamol Barat Estate on 24/2/2023 - IOI Organic Oil (M) Pamol Timur Estate on 29/8/2023 	<p>Complied</p>

		<ul style="list-style-type: none"> - Mamor Estate on 15/3/2023 - Pamol Kluang POM on 21/8/2023 <p>Briefings on the Policy were given to external stakeholders on 4/10/2023.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on records sighted and interviews conducted with workers and local communities, as well as security personnel, there was no evidence that Pamol Kluang POM and its supply base instigate violence or use any form of harassment in the operations.</p>	Complied
<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>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Palm Oil Mill and its supply base was able to demonstrate that it complied with the Company's Standard Operating Procedure known as "Grievance Procedure (Section 7.0)". The procedure includes the mechanism of receiving, recording and addressing any complaints/grievance from affected parties. Among the complaints and grievance channels include filling up the complaints form, Green Book, and IOI Mesra.</p> <p>With regards of ensuring anonymity of complainants or whistle-blowers, IOI has its 'Whistle-blowing Policy' revised November 2022 which ensures anonymity and protects whistleblowers against reprisals or intimidation.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The documented system in dealing with complaints and grievances are briefed during muster briefing. For those who are illiterate, flowcharts and pictorial explanations were given. Briefing on grievance mechanism and the related procedures were briefed as follows to all workers as follows:</p> <ul style="list-style-type: none"> - Swee Lam Estate on 25/10/2023 	Complied

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		<ul style="list-style-type: none"> - IOI Organic Oil (M) Pamol Barat Estate on 24/2/2023 - IOI Organic Oil (M) Pamol Timur Estate on 29/8/2023 - Mamor Estate on 15/3/2023 - Pamol Kluang POM on 21/8/2023 <p>Assessment forms were sighted to ensure the understanding by the workers, including those who are illiterate. Sighted were the written assessments done after each briefing; one of which was dated 16/3/2023 which was attended by 21 workers at Swee Lam Estate.</p>	
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>Pamol Kluang Palm Oil Mill and its supply base were able to demonstrate that they are kept informed of the progress of their grievances. Sampled during the surveillance audit were grievances recorded in the Green Books, the actions taken and the communication to the complainant.</p> <ol style="list-style-type: none"> 1. During JCC meeting, a grievance was raised by a worker that the road at IOI Organic Oil (M) Pamol Barat Estate that the road leading to the housing was dangerous and slippery. Action was taken on 13/11/2023. 2. At IOI Organic Oil (M) Pamol Timur Estate, a worker's grievance was that harvesting has become more difficult due to tall grass because at organic field, no chemical is used. The management responded by informing that more regular grass cutting at the organic field will be carried out. 3. At Mamor Estate, a grievance lodged in the Green Book on 12/7/2023 was attended to and acknowledged by the complainant on the same day. 	Complied

		<p>4. At Mamor Estate, a grievance lodged in the Green Book on 19/6/2023 about speeding lorry. Training to the driver was done by the assistant manager on 10/6/2023.</p> <p>5. At IOI Organic Oil (M) Pamol Barat Estate, a complaint on mosquitos were lodged in the Green Book on 16/6/2023 and fogging was caried out on the same day, and acknowledged by the complainant.</p>	
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>The conflict resolution mechanism is contained in IOI Corporation Berhad Grievance Procedure (Doc Ref.: IOI/P/GP/001 Rev No. 1 Rev Date 20 Jan 2020). This procedure allows aggrieved parties to have access to information, advice and expertise.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Consultation for any contribution with stakeholders has been conducted during the external stakeholders meeting and as per document reference IOI/P/F/MM dated 30/12/2020.</p> <p>Contribution done by Supply bases as per below</p> <p>Mamor Estate</p> <p>i) Family day & Sport Day dated 23-24/06/2023</p> <p>ii) Iftar with workers dated 23/03/2023</p> <p>Swee Lam Estate</p> <p>i) Family day & Sport Day dated 14/05/2023</p> <p>ii) Iftar with workers dated 09/04/2023</p> <p>Pamol POM</p> <p>i) Donation to SK Seri Sembong RMXXX dated 31/07/2023</p> <p>ii) Donation for Annual Festival St Anne dated 29/07/2023</p>	Complied

		<p>Pamol Barat Estate</p> <ul style="list-style-type: none"> i) FGrass Cutting, Water tank to Temple Sri Subramaniyar dated 10/05/2023 ii) Family day for workers dated 18/06/2023 <p>Pamol Timur Estate</p> <ul style="list-style-type: none"> i) Runsite for The Kelab Hash House Harriers and Harriest Gunung Lambak Kluang dated 02/08/2023 ii) Family day for workers dated 17/06/2023 	
<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>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>Copies of the land titles of all estates were maintained and noted to be legally owned by the IOI Group.</p> <p>The original copies are maintained by the Corporate Head office in Putrajaya, Malaysia. The legal use of the land is confirmed to be for the cultivation of oil palms and agricultural use.</p> <p>There were no recorded or known disputes over the ownership of the land. No changes to the land ownership or new land acquisition since the last assessment.</p> <p>Sampled land titles as follow:</p> <ul style="list-style-type: none"> (1) <u>Pamol Kluang POM:</u> Ownership No. 88881; Lot No. 2429; Total Area of 4.0974 hectares, Land Use Category is Agriculture; Freehold; Ownership Record is Pamol Plantations Sdn Bhd (2) <u>Mamor Estate:</u> 	<p>Complied</p>

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		<p>Ownership No. 617565; Lot No. 2550; Total Area of 2,230 hectares, Land Use Category is Agriculture; Freehold; Ownership Record is Pamol Plantations Sdn Bhd</p> <p>(3) <u>Swee Lam Estate:</u></p> <p>The total number of land titles for the estate are thirty-five (35) land titles. Sampled as below:</p> <ul style="list-style-type: none"> • Ownership No. 29900; Lot No. 6287; Total Area of 3.5865 hectares, Land Use Category is Agriculture; Freehold; Ownership Record is Nice Frontier Sdn Bhd • Ownership No. 1009; Lot No. 1851; Total Area of 2.934 hectares, Land Use Category is Agriculture; Freehold; Ownership Record is Nice Frontier Sdn Bhd • Ownership No. 1009; Lot No. 612; Total Area of 2.934 hectares, Land Use Category is Agriculture; Freehold; Ownership Record is Nice Frontier Sdn Bhd • Ownership No. 623; Lot No. 1872; Total Area of 3.4651 hectares, Land Use Category is Agriculture; Freehold; Ownership Record is Nice Frontier Sdn Bhd • Ownership No. 237352; Lot No. 2665; Total Area of 56.5295 hectares, Land Use Category is Agriculture; Freehold; Ownership Record is Nice Frontier Sdn Bhd <p>(4) <u>IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate:</u></p> <p>Located inside Pamol Barat Estate. 2 of the 6 land titles belonging to Pamol Barat Estate are allocated to IOI Organic Oils (M) Sdn Bhd - Pamol Barat Estate. The 2 land titles are:</p> <ul style="list-style-type: none"> • Ownership no. 56272; Lot No. 1877; Total Area of 2050.1393 hectares (684.99 hectares allocated to IOI 	
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		<p>Organic Oils (M) Sdn Bhd – Pamol Barat Estate), Land Use Category is Agriculture; Freehold; Ownership Record is Pamol Plantations Sdn Bhd</p> <ul style="list-style-type: none"> • Ownership no. H.S.(D): 73767; Lot No. PTD 89116; Total Area of 36.094 hectares (3.01 hectares allocated to IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate), Land Use Category is Agriculture; Freehold; Ownership Record is Pamol Plantations Sdn Bhd <p>(5) <u>IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate:</u></p> <p>Located inside Pamol Timur Estate. 2 of the land titles belonging to Pamol Timur Estate are allocated to IOI Organic Oils (M) Sdn Bhd - Pamol Timur Estate. The 2 land titles are:</p> <ul style="list-style-type: none"> • Ownership no. 94673; Lot No. 2589; Total Area of 859,957 hectares (357 hectares allocated to IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate), Land Use Category is Agriculture; Freehold; Ownership Record is Pamol Plantations Sdn Bhd • Ownership no. 88885; Lot No. 2430; Total Area of 808.1572 hectares (83 hectares allocated to IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate), Land Use Category is Agriculture; Freehold; Ownership Record is Pamol Plantations Sdn Bhd <p>The organic sections of Pamol Barat Estate and Pamol Timur Estate are managed by a leasing company which is IOI Organic Oils (M) Sdn Bhd. based on certificate of incorporation of private company no. 202201033166 (1478863-A) which stated is, on and from the 7th day of September 2022, incorporated under the Companies Act 2016.</p>	
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		<p>Evident from the Financial Report 2023 of IOI Corporation Berhad that Nice Frontier Sdn Bhd ("NFSB") is a subsidiary of IOI Properties Group Berhad ("IOIPG"). From the same report also stated that IOI Organic Oils (M) Sdn Bhd is 100.0% subsidiary of Pamol Plantations Sdn Bhd and Pamol Plantations Sdn Bhd is 100.0% direct subsidiary of IOI Corporation Berhad.</p> <p>Verify through land title has been confirmed that IOI Corporation Berhad has the right to use the land which their company legitimately owns.</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	Complied
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	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	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	Complied

	<p>status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>		
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>Appropriate landscape maps with latitude & longitudes showing the legal boundary and neighbouring/ surrounding areas of the POM and estates were available and maintained.</p> <p>The lands at the UoC are legally owned by IOI Corporation Berhad and no other users were identified in the land area.</p> <p>The existing estates are not encumbered by any customary land rights and therefore the process of participatory mapping is not required.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There was no land dispute in this UoC at the time of audit. As such this process is not applicable for verification.</p>	Complied
4.4.5	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documentation review, observations made and interview with management, there is no evidence of any land conflicts, or claims for legal or customary rights against the Pamol Kluang POM & Supply Bases.</p> <p>Therefore, this Indicator about communities being represented by parties of their own choosing is not applicable.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, observations made and interview with management, there is no evidence of any land conflicts, or claims for legal or customary rights against Pamol Kluang POM & Supply Bases.</p>	Complied

		Therefore, this Indicator about agreements negotiated through FPIC is not applicable.	
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.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Pamol Kluang POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally purchased/leased. Therefore, community representation through institutions of their own choosing cannot be assessed.	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 -	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Pamol Kluang POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. Therefore, FPIC is not necessary to be assessed.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Pamol Kluang POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. Therefore, FPIC is not necessary to be assessed.	Complied

	- Minor compliance -		
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>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Pamol Kluang POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>Therefore, FPIC is not necessary to be assessed.</p>	Complied
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>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Pamol Kluang POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>Therefore, FPIC is not necessary to be assessed.</p>	Complied
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>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Pamol Kluang POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>Therefore, FPIC is not necessary to be assessed.</p>	Complied
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>	<p>There is no evidence of any land acquired for plantations or mill after 15 November 2018 within Pamol Kluang POM & Supply Bases.</p>	Complied

4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>There is no evidence of any new lands acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Complied</p>
<p>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.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Group has established the Grievance Procedure for Land Owner approved by the Plantation Director dated March 2019. The procedure is used to identify legal, customary or user rights of land, and how to identify people entitled to compensation.</p> <p>This process requires verification on the ground with the affected community, overlaying the parcel with IOI Land Information System, estimate the size and present the verification map to the claimant in a transparent manner, and prepare draft of compensation award for approval after getting the latest suitable value for compensation form relevant authorities. If the draft compensation award is agreed by the Plantation Director, it would then be submitted to IOI Management for approval and subsequent payment. If the compensation is not accepted, parties are to go back to negotiation and verification process.</p> <p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Pamol Kluang POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>Therefore, procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation was not use in this certification units.</p>	<p>Complied</p>

4.6.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>A mutually agreed procedure for calculating and distributing fair and gender-equal compensation is available under IOI's Grievance Procedure for Land Owner approved by the Plantation Director dated March 2019. The procedure for calculating and distributing fair and gender-equal compensation is to conduct land parcel verification on the ground with the affected community, overlay the parcel via IOI's Land Information System, estimate size, and get the latest suitable value for compensation from relevant authorities.</p> <p>As of the date of audit, there is no conflict raised related to land issues against Pamol Kluang POM & Supply Bases.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>No scheme small holdings engaged by the UoC for FFB supplies.</p> <p>Therefore, this indicator is Not Applicable to the UoC.</p>	Not Applicable
4.6.4	<p>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.</p> <p>- Minor compliance -</p>	<p>There has been no evidence of negotiated agreements, compensation, and payments being made as there is no occurrence of such issues at Pamol Kluang POM & Supply Bases.</p>	Complied
<p>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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>A mutually agreed procedure for identifying people entitled to compensation is available under IOI's Grievance Procedure for Land Owner approved by the Plantation Director dated March 2019.</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and</p>	<p>A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is available under IOI's Grievance Procedure for Land Owner approved by the Plantation</p>	Complied

	implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Director dated March 2019. This procedure was made available during external stakeholder meetings conducted.	
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 -	There is no plantation expansion at the time of audit. Based on documentation review, observations made and interviews with management and local communities, there was no evidence of loss of access and rights to land involving Pamol Kluang POM & 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 -	Based on desktop studies prior to the audit, documentation review, observations made, and interviews held with external stakeholders, local communities, and management team, it was verified that the Pamol Kluang POM & Supply Bases are not subjected to any legal, customary and user rights. There is no land dispute at the time of audit.	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 -	Based on desktop studies prior to the audit, documentation review, observations made, and interviews held with external stakeholders, local communities, and management team, it was verified that the Pamol Kluang POM & Supply Bases are not subjected to any legal, customary and user rights. There is no land conflict exist at the time of audit.	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	Based on desktop studies prior to the audit, documentation review, observations made, and interviews held with external stakeholders, local communities, and management team, it was verified that the	Complied

	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Pamol Kluang POM & Supply Bases are not subjected to any legal, customary and user rights. There is no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.	
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 -	Based on desktop studies prior to the audit, documentation review, observations made, and interviews held with external stakeholders, local communities, and management team, it was verified that the Pamol Kluang POM & Supply Bases are not subjected to any legal, customary and user rights. There is no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.	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 -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
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 -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
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 -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable

5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.</p>	Not Applicable
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.</p>	Not Applicable
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Each of the weighbridges available at the operating unit has been calibrated on annual basis by weighing and measuring equipment verification service provider which was appointed by the Federal Government of Malaysia through Ministry of Domestic Trade and Consumer Affairs (KPDNHEP) under Akta Timbang dan Sukat 1972. Evident the Borang D and Calibration Report for each of the weighbridges during the audit as below:</p> <p>(1) Pamol Kluang POM:</p> <p>Verified that there are two (2) weighbridges available as details below:</p> <ul style="list-style-type: none"> • Calibration Report No.: CA 002946 	Complied

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		<p>Calibration Certificate No.: B1808650 Calibration Date: 22-Jun-2023</p> <ul style="list-style-type: none"> • Calibration Report No.: CA 002947 <p>Calibration Certificate No.: B1808649 Calibration Date: 22-Jun-2023</p> <p>(2) Mamor Estate: Verified that there is one (1) weighbridge available as details below:</p> <ul style="list-style-type: none"> • Calibration Report No.: CA 002860 <p>Calibration Certificate No.: B1808612 Calibration Date: 11-Apr-2023</p> <p>(3) Swee Lam Estate: Verified that there is one (1) weighbridge available as details below:</p> <ul style="list-style-type: none"> • Calibration Report No.: CA 052198 <p>Calibration Certificate No.: B 2126361 Calibration Date: 03-Oct-2023</p> <p>During the audit, it was confirmed that IOI Organic Oils (M) Sdn Bhd - Pamol Timur Estate and IOI Organic Oils (M) Sdn Bhd - Pamol Barat Estate do not have weigh bridges on-site. This absence is justified by the proximity of these two estates to Pamol Kluang Palm Oil Mill (POM). Any activities that necessitate the use of a weighing bridge, such as weighing Fresh Fruit Bunches (FFB) or weighing</p>	
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		fertilizer during reception, are efficiently conducted at Pamol Kluang POM.	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Documented procedures for dealing with any substantive and procedural complaints and grievances relating to stakeholders is based on IOI group procedure, Grievance Procedure, dated 20/01/2020.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Pamol Kluang POM is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. The methodology regarding how the unit of certification consults with interested smallholders, irrespective of their type, including women and other partners in their supply base, to assess their needs for support in improving their livelihoods and their interest in RSPO certification could be further enhanced. Thus, OFI was raised.	OFI
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).	Pamol Kluang POM is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable

	- Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Pamol Kluang POM is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Pamol Kluang POM is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Pamol Kluang POM is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	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 -	A publicly available non-discrimination and equal opportunity policy known as Equal Opportunity Employment and Freedom of Association Policies is available at Pamol Kluang Palm Oil Mill and its supply base. This Policy is publicly displayed at main notice boards and at the workers' housing. Among other things, the Policy states that there will be no discrimination based on race, national origin, religion, gender, union membership and age. Various audit interviews were carried out with the workers (foreign, local, male, female) at all sampled units. All workers interviewed confirmed that there was no form of discrimination. All workers are given equal employment opportunities and are able to enjoy all the	Complied

		benefits and use of amenities accorded by the Company, irrespective of background, gender and nationality.	
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>Based on documentation review, which was supported by audit interviews and field observations, there was no evidence that workers, local communities, women and migrant workers have been discriminated against. None of the sampled migrant workers have paid any recruitment fees. This is in tandem with IOI Group’s Sustainable Palm Oil Policy (Revised October 2020) signed by the Group Managing Director and Group Head of Sustainability which states that no worker would be charged any recruitment related fee at any stage in the recruitment process. None of the newly recruited workers sampled during the audit had been charged any recruitment fee. The said workers who were sampled were:</p> <ul style="list-style-type: none"> a. IOI Organic Oil (M) Pamol Barat Estate: Nepali workers Passports No. 1185xxx, 1869xxx, 0811xxx Indonesian worker Passport No. E1174xx b. IOI Organic Oil (M) Pamol Timur Estate: Indonesian worker Passport No. E1314xx, Nepali workers Passports No. 1187xxxx, 0753xxxx c. Pamol Kluang Palm Oil Mill: Indonesian workers Passports No. E1905xxx, E0791xxx Indian worker Passport No. V8131xxx d. Mamor Estate: Bangladeshi worker Passport No. EB0833xxx 	Complied

		<p>Indonesian worker Passport No. E1316xxx</p> <p>e. Swee Lam Estate:</p> <p>Indonesian workers Passports No. E0597xxx, E0597xxx</p> <p>Indian worker Passport No. W0149xxx</p> <p>Nepali worker Passport No. 0730xxxx</p>	
<p>6.1.3</p>	<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>Evidence was available that the recruitment selection, hiring and access to training were based on skills, capabilities and medical fitness. Verified during this surveillance audit that the process of recruitment for local employees starts with each job applicant filling up a job application form attaching copies of NRIC, qualification and previous work experience. The respective Manager would then assess their suitability to the job vacancy. If suitable, the said workers were required to undergo a medical test. For foreign workers, they are also vetted by the recruitment agents before being selected for interviews.</p> <p>Newly recruited workers would also attend an orientation and induction training to familiarize them with their work in IOI. Sampled were the following workers:</p> <p>IOI Organic Oil (M) Pamol Barat Estate:</p> <ul style="list-style-type: none"> • Nepali workers Passports No. 1185xxx, 1869xxx, 0811xxx • Indonesian worker Passport No. E1174xx <p>IOI Organic Oil (M) Pamol Timur Estate:</p> <ul style="list-style-type: none"> • Malaysian workers NRIC No. 011231-01-xxxx • Indonesian worker Passport No. E1314xx, 	<p>Complied</p>

		<ul style="list-style-type: none"> • Nepali workers Passports No. 1187xxxx, 0753xxxx <p>Pamol Kluang Palm Oil Mill:</p> <ul style="list-style-type: none"> • Malaysian worker NRIC No. 941027-01-xxxx • Indonesian workers Passports No. E1905xxx, E0791xxx • Indian worker Passport No. V8131xxx <p>Mamor Estate:</p> <ul style="list-style-type: none"> • Malaysian worker NRIC No. 950523-01-xxxx • Bangladeshi worker Passport No. EB0833xxx • Indonesian worker Passport No. E1316xxx <p>Swee Lam Estate:</p> <ul style="list-style-type: none"> • Malaysian worker NRIC No. 960131-11-xxxx • Indonesian workers Passports No. E0597xxx, E0597xxx • Indian worker Passport No. W0149xxx • Nepali worker Passport No. 0730xxxx 	
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>Pursuant to Clause 4.1.2 of IOI’s Guidelines on Reproductive Health (Ref: IOI/G/SE/002 Rev No. 2 Issued on 14 Aug 2020), the Estate Health Assistants will carry out health screening including urine pregnancy test (UPT) every 3 months for general workers subject to their consent to ensure reproductive health of employees are protected. Members of the WEC and other female workers interviewed during this surveillance audit confirmed their understanding that the health screening and UPT are done for safety and health purposes, and would only be carried out with their written consent. As part of the triangulation process, documents</p>	Complied

		<p>containing the female workers' consent and refusal were sighted. Sighted during the audit at Swee Lam Estate were consents from four female employees for pregnancy test dated 29/9/2023.</p>	
<p>6.1.5</p>	<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. - Critical (Major) compliance -</p>	<p>Sighted during the audit were the organisational chart for the Women Empowerment Committee 2023 of each operating unit. This committee comprise a Chairperson, Vice Chair, Secretary, Treasurer, and committee members.</p> <p>In accordance with the IOI website (https://www.ioigroup.com/sustainability/empowering-women-within-the-ioi-plantation-community), the WEC is a platform for female employees to discuss any issues that may affect them in their respective operating unit, such as, but not limited to, sexual harassment, physical violence, gender discrimination, welfare and workplace-related issues. The WEC will also explore opportunities in empowering women at the workplace through capacity building and social activities which are not limited to IOI female employees, but also to female dependents living within the IOI plantation community.</p> <p>Members of the WEC were interviewed and WEC meeting minutes were reviewed during this surveillance audit. The members understood the roles of the WEC, potential issues of concern that women have such as sexual harassment and harassment at workplace, domestic violence, and reproductive rights. They were aware of the grievance mechanism for addressing issues of concern, and they can also provide feedback to management on any social impacts they may encounter. It was also verified that the description on the website mentioned above is correct and implemented.</p>	<p>Complied</p>

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		<p>WEC meetings were held at each operating unit to discuss objectives of the WEC, sexual harassment, domestic violence, grievance mechanism, membership, reproductive rights, pregnant mothers not to be involved in chemical and fertiliser, etc.</p> <p>The sampled meetings were held as follows:</p> <p>Mamor Estate (12/6/2023)</p> <p>Swee Lam Estate (15/9/2023)</p> <p>Pamol Kluang POM (13/5/2023 & 3/10/2023).</p>																								
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>All units within Pamol Kluang Palm Oil Mill and its supply base were able to demonstrate evidence of equal pay for the same work scope. This was verified by reviewing sampled payslips and employment contracts of the following workers. Workers doing the same job receives the same rate of pay.</p> <table border="1" data-bbox="1137 887 1919 1391"> <thead> <tr> <th>Estate/Mill</th> <th>Job scope</th> <th>Nationality</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Mamor Est</td> <td>Driver</td> <td>Indonesian</td> </tr> <tr> <td>Driver</td> <td>Indonesian</td> </tr> <tr> <td rowspan="2">Swee Lam Est</td> <td>Harvester</td> <td>Indian</td> </tr> <tr> <td>Harvester</td> <td>Nepali</td> </tr> <tr> <td rowspan="2">Pamol Kluang Mill</td> <td>Lab attendant</td> <td>Malaysian</td> </tr> <tr> <td>Lab attendant</td> <td>Myanmar</td> </tr> <tr> <td rowspan="2">IOI Organic Oil (M) Pamol Barat Estate</td> <td>Grasscutter</td> <td>Nepali</td> </tr> <tr> <td>Grasscutter</td> <td>Nepali</td> </tr> </tbody> </table>	Estate/Mill	Job scope	Nationality	Mamor Est	Driver	Indonesian	Driver	Indonesian	Swee Lam Est	Harvester	Indian	Harvester	Nepali	Pamol Kluang Mill	Lab attendant	Malaysian	Lab attendant	Myanmar	IOI Organic Oil (M) Pamol Barat Estate	Grasscutter	Nepali	Grasscutter	Nepali	Complied
Estate/Mill	Job scope	Nationality																								
Mamor Est	Driver	Indonesian																								
	Driver	Indonesian																								
Swee Lam Est	Harvester	Indian																								
	Harvester	Nepali																								
Pamol Kluang Mill	Lab attendant	Malaysian																								
	Lab attendant	Myanmar																								
IOI Organic Oil (M) Pamol Barat Estate	Grasscutter	Nepali																								
	Grasscutter	Nepali																								

		IOI Organic Oil (M) Pamol Timur Estate	General worker	Nepali	
				General worker	Nepali
Based on the document verification and interview conducted with sample workers from different job scope, nationality and gender confirmed that there is no issue in term of equal pay for the same work scope.					
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	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Each foreign worker signed an employment contract, and local workers signed a job offer letter. It was verified during the surveillance audit that each contract was prepared in accordance with the language the workers are familiar with. For example, Bengali was used for Bangladeshi workers, Hindi for Indian workers, Nepali for workers from Nepal and Bahasa Indonesia for Indonesian workers. During audit interviews, all sampled workers confirmed that they understood the contents of their contracts. In addition, the workers also confirmed that the contracts were explained to them by their respective worker representatives.</p> <p>Records of briefings to the workers were sighted as follows:</p> <ol style="list-style-type: none"> 1. Mamor Estate: 18/3/2023 (explanation on payslips, minimum wages and leave pay policies) 2. Swee Lam Estate: 21/2/2023 (payslip on workers' work verification) 3. Pamol Kluang Mill: 13/5/2023, 1/6/2023, 24/6/2023 payslip trainings, minimum wages and leave pay policies in Malaysia. 			Complied

		4. IOI Organic Oil (M) Pamol Timur Estate: 27/9;2023 on payslip, work verification and VLP briefing.									
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>These employment contracts contain applicable labour laws and conditions of pay such as wages payable, job description, regular working hours, statutory deductions, overtime, paid public holidays, annual, mutual notice period for termination, etc. Minimum wages is payable in accordance with Minimum Wages Order 2022, 7.5 working hours (excluding minimum 30 min of rest after the 5th hour) as per the revised Employment (Amendment) Act 2022, rest day, rate payable for work on rest day, paid sick leave, paid annual leave, paid maternity and paternity leave, provisions for mutual termination, benefits new workers are entitled to upon arrival (such as PPE, mattress, pillow, drinking water can), repatriation costs, etc.</p> <p>Workers' documentation of pay is available in their monthly pay slips. During the audit, employment contracts, letters of job offer and payslips for the months of March, July and October 2023 were sampled based on the highest, lowest and median figure of FFB produced.</p> <p>Both the employment contracts and letters of job offer are given to the workers for their record and safekeeping.</p> <p>The sampling of workers was done based on the following formula of $\sqrt{n} \times 0.8$ with n= total number of workers for each operating unit. For Pamol Kluang Palm Oil Mill and its supply base, April, July, October 2023. The sampled contracts and payslips were as follows:</p> <table border="1" data-bbox="1144 1225 1921 1345"> <thead> <tr> <th data-bbox="1144 1225 1373 1345">Estate/Mill</th> <th data-bbox="1373 1225 1543 1345">Job scope</th> <th data-bbox="1543 1225 1733 1345">Nationalities</th> <th data-bbox="1733 1225 1921 1345">Date of employment contract</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate/Mill	Job scope	Nationalities	Date of employment contract					Complied
Estate/Mill	Job scope	Nationalities	Date of employment contract								

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		IOI Organic Oils (M) Pamol Barat Estate	Grasscutter	Indian	1/6/2022
			Mandore	Bangladeshi	1/6/2022
			Grasscutter	Indian	1/2/2023
			Grasscutter	Nepali	3/9/2022
			Grasscutter	Malaysian	17/6/2023
			Grasscutter	Indian	3/9/2022
			Grasscutter	Nepali	2/9/2022
			Grasscutter	Indonesian	16/5/2023
			Grasscutter	Nepali	2/9/2022
		IOI Organic Oils (M) Pamol Timur Estate	Harvester	Indonesian	16/1/2023
			Harvester	Bangladeshi	20/1/2023
			Harvester	Indian	18/1/2023
			Harvester	Nepali	3/9/2023
			Harvester	Nepali	3/9/2023
			Harvester	Nepali	3/9/2023
Mamor Estate	Fertiliser applicator	Bangladeshi	2/5/2023		
	Sprayer	Bangladeshi	2/5/2023		

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			Field maintenance	Bangladeshi	2/5/2023	
			Field maintenance	Bangladeshi	2/5/2023	
			Harvester	Bangladeshi	2/5/2023	
			Harvester	Bangladeshi	2/5/2023	
			Driver	Indonesian	2/5/2023	
			Driver	Indonesian	1/8/2022	
			Harvester	Indonesian	16/2/2023	
			Gardener	Malaysian	4/9/2023	
		Pamol Mill	Kluang	Workshop operator	Malaysian	1/11/202
				Lab attendant	Malaysian	1/1/2023
				Cleaner	Malaysian	1/1/2023
				Cleaner	Malaysian	1/1/2023
				Watchman	Malaysian	1/1/2023
				Workshop	Indonesian	17/5/2023

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			Ramp attendant	Indian	22/11/2022
			General worker	Indian	3/3/2023
			General worker	Nepali	3/3/2023
			Lab attendant	Myanmar	3/3/2023
			Effluent	Myanmar	3/3/2023
			Ramp attendant	Myanmar	3/3/2023
		Swee Lam Est	General worker	Malaysian	1/3/2023
			General worker	Malaysian	2/10/2023
			Mandore	Bangladeshi	9/5/2022
			Harvester	Bangladeshi	9/5/2022
			Harvester	Indonesia	10/3/2023
			Harvester	Indonesia	29/11/2022
			Sprayer	Indonesia	10/3/2023
Harvester	Indonesia	18/1/2023			

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			Harvester	Indonesia	15/4/2023	
			Harvester	Indonesia	12/5/2023	
			General worker	Indian	1/9/2022	
			Harvester	Indian	2/12/2022	
			Harvester	Nepali	3/9/2022	
6.2.3	<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>Employment contracts and payslips sampled and reviewed during this surveillance audit are as per Indicator 6.2.2 above.</p> <p>Based on interviews with workers, review of employment contracts and payslips for all sampled workers, there was evidence that Pamol Kluang Palm Oil Mill and its supply base comply with legal labour requirements related to working hours, deductions, overtime, maternity leave, medical leave, annual leave, reasons for dismissal, etc.</p> <p>It was clearly detailed out in the sampled employment contracts that regular working hours is 7.5 hours per week with 30-minute rest after 5 hours, or a spread over period of 10 hours with 2.5 hours of rest.</p> <p>Documentary evidence was available within Pamol Kluang Palm Oil Mill and its supply base that regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, etc were complied with. This was triangulated against worker interviews and observations. All workers interviewed confirmed that they work 8 hours per day, for 6 days a week, with one rest day. Any work done beyond 8 hours is considered overtime which they are paid at 1.5 per hour the normal rate. Overtime is not compulsory, and would</p>	Complied			

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		<p>only be carried out if mutually agreed between employee and employer. Also sighted were the written applications from the workers to deduct their salaries for the above purposes. Any work on rest day (Sunday) were only carried out after the workers had signed the Rest Day Requisition Form.</p> <p>Records of statutory deductions for SOCSO, EPF, EIS for local employees were also verified. Non-statutory deductions were for water and electricity which have received written approval from the Labour Office. The Labour Office permits were as follows:</p> <ol style="list-style-type: none"> a. Mamor Estate: BHG.PU/9/12/12(23) dated 27/12/2019 for electricity deductions; b. Swee Lam Estate: Serial No. PP4/29/111/2001 dated 21/11/2019 for electricity deductions; c. Pamol Kluang Mill: Ref TK(NJ)U-23 dated 7/1/2019 for temple/mosque fee deductions; BHG.PU/9/129/12(22) dated 27/12/2019 for water; BHG.PU/9/129/12(24) for electricity; d. IOI Organic Oil (M) Pamol Barat Estate: TK(NJ)U-23 dated 4/7/2019 deductions for temple/mosque; TK(NJ) U – 23 (05) dated 16/6/2016 for water; and BHG PU/9/129/12 (18) dated 27/12/2019 for electricity; e. IOI Organic Oil (M) Pamol Timur Estate: BHG.PU/9/129/12(12) dated 27/12/2019 for water bill deductions and BHG.PU/9/129/12(20) dated 27/12/2019 for electricity deductions. <p>The sampled payslips also showed that the workers were paid in accordance with the Minimum Wages Order 2022.</p>	
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		<p>Based on the above, Pamol Kluang Palm Oil Mill and its supply base was able to demonstrate that labour legal requirements have been complied with.</p>	
<p>6.2.4</p>	<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>Workers of Pamol Kluang Palm Oil Mill and its supply base are provided with adequate housing, sanitation facilities, water and electricity supplies, medical and welfare amenities free of charge. Other amenities available included surau, temples, futsal court, sundry shop, water dispenser, canteen and sundry shops. Of the shops at Mamor Estate was Mak Ju Corner. It was verified that the cook (Mak Ju) attended the KKM-accredited Food Handling Course on 7/11/2023 & took her typhoid injection on 30/8/2023.</p> <p>Visits to the workers’ housing confirmed that workers’ houses were generally kept in good and well-maintained condition. This was further confirmed by workers interviewed during the audit. Grasses are kept short, and rubbish disposed of regularly. Perimeter drains were kept in a clean condition that permitted free flow of water.</p> <p>Housing inspections were carried out by the Estate Health Assistants (EHA) on a weekly basis. The clinics were also visited by a Visiting Medical Officer (VMO) fortnightly. Sampled were the following VMO visits:</p> <p>Mamor Estate:</p> <p>a) VMO Dr Helen Tan Kwai from Klinik Renggam, Kluang visited on 11/11/2023 & 25/11/2023.</p> <p>b) Housing inspections by EHA: 6/11/2023, 15/11/2023, and 21/11/2023.</p> <p>IOI Organic Oil (M) Pamol Barat Estate:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> • VMO Dr Helen Tan Kwai from Klinik Renggam, Kluang visited on 7/10/2023, 21/10/2023, 18/11/2023, 4/11/2023; • Housing inspections by EHA: 4/11/2023, 11/11/2023, 18/11/2023. 25/11/2023 <p>IOI Organic Oil (M) Pamol Timur Estate:</p> <p>a) VMO visited on 21/10/2023, 28/10/2023, 1/11/2023, 25/11/2023 where she also checked the linesite and attended to patients.</p> <p>b) Housing inspections by EHA: 19/10/2023, 25/10/23,2/11/2023, 10/11/2023, 16/11/2023, 24/11/2023.</p>	
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>Pamol Kluang Palm Oil Mill and its supply base were able to demonstrate that efforts have been made to improve workers' access to adequate, sufficient and affordable food. Apart from each operating unit having its own canteen and sundry near the workers' housing, workers were also allocated areas near their houses for vegetable cultivation.</p> <p>Additionally, price of items sold at the sundry shops and canteens are compared with the prices from other shops/supermarkets to ensure it is not too exorbitant.</p> <p>Sighted price comparisons done at:</p> <ul style="list-style-type: none"> - Kedai Runcit Mariayee (Pamol Kluang Mill) - Kedai Lee Hock Yam (IOI Organic Oil (M) Pamol Timur Estate) - Kedai Runcit Lora (Mamor Estate). <p>The shops compared with, were Kedai Chim Ah Tong & Kedai Roslan Jantan, both at Kg Orang Asli Pengekalan Tereh, Kluang.</p>	OFI

		<p>The last price comparison exercise for Kedai Runcit Lora was done on 10/8/2023. This can be further improved if it was done after price increase of essential food items e.g. rice in September. Thus, OFI was raised.</p>											
<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>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 endeavour 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 (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils 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 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>The calculation of total living wages was carried out taking into account in-kind benefits, food basket, non-food, non-housing. The total living wages is therefore calculated at RM1,726.74 which is higher than the legal Minimum Wage of RM1,500 per month.</p> <table border="1" data-bbox="1137 662 1930 954"> <thead> <tr> <th></th> <th>RM</th> </tr> </thead> <tbody> <tr> <td>In-kind benefit</td> <td>937.74</td> </tr> <tr> <td>Food basket</td> <td>467.00</td> </tr> <tr> <td>Non-food non-housing</td> <td>322.00</td> </tr> <tr> <td>Total living wages</td> <td>1,726.74</td> </tr> </tbody> </table> <p>This is the average calculation of Total Living Wages for all workers, calculated using the formula contained in RSPO Guidance Implementing A Decent Living Wage.</p>		RM	In-kind benefit	937.74	Food basket	467.00	Non-food non-housing	322.00	Total living wages	1,726.74	<p>Complied</p>
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	<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 (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).</i></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 • 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 including contractors' workers and contracted workers 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>All the estates and mill employ full-time employees. There is no casual, temporary and day labour engagement at all operating units within Pamol Kluang Palm Oil Mill and its supply base.</p>	Complied
<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 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>6.3.1</p>	<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>The published statement recognising freedom of association is available in the IOI's Equal Opportunity and Freedom of Association Policy dated October 2017 signed by the Plantation Director. This was explained to all workers during Policy trainings conducted at all estates. The trainings were conducted as follows:</p> <p>Mamor Estate: 24/2/2023 and 15/3/2023; Swee Lam Estate: 17/2/2023; Pamol Kluang Mill: 11/6/2023 IOI Organic Oil (M) Pamol Barat Estate: 24/2/2023 IOI Organic Oil (M) Pamol Timur Estate: 21/8/2023</p>	<p>Complied</p>
<p>6.3.2</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>Minutes of meetings between management of each unit and worker representatives were documented and available in Bahasa Malaysia.</p> <p>Every two months, the workers have their own Employee Consultative Committee (ECC) meetings where they would highlight issues that would like to bring to the management. The worker representatives then attend the Joint Consultative Committee (JCC) meetings with management to bring and discuss issues brought up during the ECC meetings.</p> <p>The JCC meetings which were attended by management and worker representatives were held as follows:</p> <p>Mamor Estate: on 27/10/2023 and 17/8/2023 Swee Lam Estate: on 24/8/2023 and 12/10/2023 IOI Organic Oil (M) Pamol Barat Estate: on 30/8/2023 IOI Organic Oil (M) Pamol Timur Estate: on 30/10/2023</p>	<p>Complied</p>

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		Pamol Kluang Palm Oil Mill: on 11/9/2023 and 28/10/2023	
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Pamol Kluang Palm Oil Mill and its supply base was able to demonstrate that the workers’ representatives were freely elected by their countrymen without any interference from the management. These include for local and migrant workers. This was confirmed by the workers during this surveillance audit, and the worker representatives themselves. Each nationality has its own worker representative, i.e., Malaysian, Indonesian, Indian, Nepali, Bangladeshi and Myanmar (only at the Mill). There were no contract workers within any of the units audited.</p> <p>A triangulation was done by reviewing records of worker elections. The worker representatives were freely elected by workers themselves as evidenced from election records. This was further verified by the workers during audit interviews. Sampled were election records at:</p> <ul style="list-style-type: none"> - Mamor Estate on 25/10/2023 - IOI Organic Oil (M) Pamol Barat Estate on 18/10/2023 - IOI Organic Oil (M) Pamol Timur Estate on 30/10/2023 	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>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.</p> <p>- Minor compliance -</p>	<p>IOI’s Sustainable Palm Oil Policy contains a provision for the protection of children, including the prohibition against child labour. This Policy also pledges to eliminate all forms of child labour. It is also included in all service contracts with contractors and suppliers.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above</p>	<p>Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Pamol Kluang Palm Oil Mill and its</p>	Complied

	<p>company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>supply base. Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job. Workers' employment files were sampled and reviewed. Please refer to Indicator 6.2.2 above for the samples taken.</p>	
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no evidence that any young persons were employed in any of the units at Pamol Kluang Palm Oil Mill and its supply base. This was evident from documentation review, field observations and interviews of workers.</p>	Complied
6.4.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Records of communications on no child labour were reviewed during the audit. Based on the documents sighted, communication about the Policy were communicated to stakeholders during external stakeholder meeting on 4/10/2023, and to all levels of employees as follows:</p> <p>Mamor Estate: 24/2/2023 and 15/3/2023;</p> <p>Swee Lam Estate: 17/2/2023;</p> <p>Pamol Kluang Mill: 11/6/2023;</p> <p>IOI Organic Oil (M) Pamol Barat Estate: 24/2/2023</p> <p>IOI Organic Oil (M) Pamol Timur Estate: 21/8/2023.</p> <p>Interview with local workers also confirmed their understanding that they are not allowed to bring their children to assist with work in the field.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p>	<p>IOI's Sustainable Palm Oil Policy which was signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020) contains the Policy to</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>prevent sexual and other forms of harassment. Additionally, prevention of sexual harassment also exists in IOI's Policy entitled "Policy on Harassment at Workplace". This Policy has been communicated to all levels of workforce, and the Policy is also displayed at main notice boards. Trainings were also held as follows:</p> <ol style="list-style-type: none"> 1. Swee Lam Estate: 15/3/2023 (for male workers), 17/3/2023 (for female workers) and during WEC meetings on 8/3/2023 and 15/9/2023. 2. Pamol Kluang Mill: WEC meetings on 13/5/2023 and 3/10/2023, and muster briefing on 11/6/2023. 3. IOI Organic Oil (M) Pamol Barat Estate: 15/3/2023 and 15/7/2023. 4. IOI Organic Oil (M) Pamol Timur Estate: 24/6/2023 and during WEC meeting on 10/12/2022 <p>Interview with workers (male, female, local and migrant) all understood the Policy.</p>	
6.5.2	<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>Protection of reproductive rights is contained in IOI's Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). This Policy is being implemented based on interviews held with women employees. The ladies confirmed that they are able to plan their families, and are entitled to 98 days paid maternity leave. Women employees who are exposed to chemicals would be re-assigned to another job once she is confirmed pregnant. Sampled during the audit was a lab assistant whose work station at the lab was immediately transferred to the office once she was confirmed pregnant. Please refer to Indicator 6.1.4 above.</p>	OFI

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		<p>This Policy is displayed at all main notice boards, muster ground and workers’ housing. IT was also communicated during Policy trainings as follows:</p> <ul style="list-style-type: none"> • Mamor Estate: 24/2/2023 and 15/3/2023; • Pamol Kluang Mill: 11/6/2023 • Swee Lam Estate: 17/2/2023; • IOI Organic Oil (M) Pamol Barat Estate: 24/2/2023 • IOI Organic Oil (M) Pamol Timur Estate: 21/8/2023. <p>Briefing on reproductive rights were given to workers by all operating units. As an opportunity for improvement, the latest briefing template is used during such briefings. Thus, OFI was raised.</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>Assessment on the needs of new mothers were carried out at Mamor Estate. A field supervisor who had just given birth was interviewed on 22/5/2023 on her fitness to work, when can resume work, nursing needs, potential exposure to chemicals, milk extraction needs, immunization and medical check-up schedule, transport needs, etc.</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>A grievance mechanism for victims to lodge a harassment report has been established and successfully implemented. One of them is IOI Mesra and Whistleblowing Policy.</p> <p>It was also communicated during muster on 16/3/2023 (Mamor Estate), 25/5/2023 (Swee Lam Estate), 15/3/2023 (IOI Organic Oil (M) Pamol Barat Estate) and on 28/9/2023 (IOI Organic Oil (M) Pamol Timur Estate).</p>	OFI

		<p>As an opportunity for improvement, the grievance process that has been implemented is reflected in the flowchart. Thus, OFI was raised.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<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>During this surveillance audit, Pamol Kluang and its supply base was able to demonstrate that all sampled workers have entered into employment voluntarily. This was verified during audit interviews with the workers themselves. Among the workers interviewed were general workers, harvesters, sprayers, manurers, drivers, and mill workers. Based on sampled documents and interviews, it was found that:</p> <ul style="list-style-type: none"> • All foreign workers confirmed that they keep their own passports and are only given to the office for purposes of passport and work permit renewals. • No recruitment fee is payable by foreign workers. This was further confirmed by the migrant workers interviewed during the audit. • Migrant workers also confirmed that they were briefed in their respective home countries and were clear about the work they would be doing before arrival in Malaysia. • As confirmed by the workers, there is no involuntary overtime, and mutually agreed. Overtime does not exceed 4 hours per day. • Workers are free to resign as per the terms in their employment contracts. • Based on the employment contracts, there is no penalty payable upon termination of contract. 	<p>Complied</p>

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		<ul style="list-style-type: none"> Workers also confirmed that there is no debt bondage or withholding of wages. This was further verified by the payslips. Documentary evidence was also available. Sighted as follows: Mamor Estate was a newly-arrived worker's Declaration dated 16/2/2023 that no recruitment fees were charged to him, and he also confirmed that he did not pay any recruitment fee to any agents and sub-agents prior to arrival in Malaysia. Swee Lam Estate: Induction and post arrival training dated 18/9/2023, and a Declaration from a newly-arrived worker that he paid no recruitment fee prior to his employment. 	
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>IOI Plantation Foreign Workers Recruitment Guideline and Procedure signed by the Plantation Director dated October 2017 (Revised July 2018) contains a specific labour policy and/or procedures for migrant workers. This Guidelines and Procedure covers the following:</p> <ul style="list-style-type: none"> No payment of recruitment fee Pre-employment stages Arrival of workers Orientation and induction training Health screening Passport handling Provision of basic items Grievance mechanism Contract renewal, etc. 	Complied

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		Based on audit interviews and records sighted, all units have demonstrated that the procedures are being implemented.	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
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 management has appointed Safety and Health Officer and he had overall responsibilities for safety and health issues for the whole Pamol Kluang POM & Supply Bases. In addition, each operating unit of the UoC has its own OSH Committee as details below:</p> <ul style="list-style-type: none"> • Pamol Kluang POM: 1 Chairman (Mill Manager – appointment letter as Chairman issued on 01/10/2023 by Senior Manager), 1 Secretary, 11 Employer Representatives, and 11 Employee Representatives • Mamor Estate: 1 Chairman (Estate Manager), 1 Secretary (Cadet Assistant – sighted appointment letter issued to Cadet Assistant as Secretary by Estate Manager dated 11-Jan-2023), 10 Employer Representatives, and 10 Employee Representatives • Swee Lam Estate: 1 Chairman (Estate Manager – sighted appointment letter issued by Plantation Controller dated 04-Sept-2023), 1 Secretary, 4 Employer Representatives, and 4 Employee Representatives • IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate: part of Pamol Barat Estate OSH Committee which consist of 1 Chairman, 1 Secretary, 9 Employer Representatives, and 9 Employee Representatives • IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate: part of Pamol Timur Estate OSH Committee which consist of 1 	Complied

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		<p>Chairman, 1 Secretary, 9 Employer Representatives, and 9 Employee Representatives</p> <p>The management of each operating unit conduct regular two-way communication with their employees through the 3-monthly ESH meeting. The minutes of meeting were sighted and verified. Safety meeting was conducted as follow:</p> <ul style="list-style-type: none"> • Pamol Kluang POM: 24/10/2023; 18/07/2023; 10/04/2023; 26/01/2023 • Mamor Estate: 23/12/2022; 29/03/2023; 28/06/2023; 26/09/2023 • Swee Lam Estate: 12/12/2022; 28/03/2023; 23/06/2023; 25/09/2023 • IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate (part of Pamol Barat Estate OSH Committee): 28/09/2023; 23/06/2023; 16/03/2023; 15/12/2022 • IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate (part of Pamol Timur Estate OSH Committee): 26/12/2022; 24/03/2023; 28/06/2023; 02/09/2023 <p>Evident from the meeting minutes that has been adequately retained by each operating unit that meeting conducted covered the concerns of all parties about health, safety, and welfare. The meeting also includes the discussion on previous minutes, workplace inspection, accident report, training, review on HIRARC, internal audit and other issues. The meeting was chaired by the Chairman of the OSH committee.</p>	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in	The management has established Emergency Prevention, Preparedness and Response (IOI-OSH 3.3.4.3), which was	Complied

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	<p>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>extracted from OSH Manual IOI-OSH 3.4.2, Appendix 1 as listed below:</p> <ul style="list-style-type: none"> • ERP for Scheduled Waste Spillages (updated on 01-Nov-2022) • ERP for Sprayer/Harvester/Manuring/Rat Bait/ General Workers (updated on 01-Nov-2022) • ERP for Crude Palm Oil, Diesel, and Lubricant Spillages (updated on 01-Nov-2022) • ERP for Fire Outbreak (updated on 01-Nov-2022) • ERP for Estate Tractor/Lorry Driver (updated on 01-Nov-2022) • ERP for Chemical Spillage in field (updated on 01-Nov-2022) • ERP for Chemical Spillage at Store/ Premix Area (updated on 01-Nov-2022) • ERP for Natural Disaster – Earthquakes and Hurricanes (updated on 03-Jan-2023) <p>Emergency Response Plans are available for Emergency Contact Numbers, Emergency Evacuation, First Aid Locations, Fire Extinguisher Locations, and Emergency Response Plan (Fire, Chemical Spillage, Chemical Contamination, Flood and Accident) and displayed at strategic locations around the mill, estate office and stores. The competent personnel are appointed and trained to be part of the Emergency Response Team. Appointment letters were sighted in both mill and estate respectively.</p> <p>During the site visit, verified that the first aid box was available at the boiler station, mill workshop, mill loading ramp, nursery area and manuring activity, FFB harvesting activity and loose fruits collection activity. Samples of First Aid box was checked, and contents found to be complete and in usable order during field visit.</p>	
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		<p>There are 11 first aiders at Pamol Kluang POM, 5 first aiders at Mamor Estate, 2 first aiders at Swee Lam Estate, 2 first aiders at Pamol Barat Estate, and 2 first aiders at Pamol Timur Estate present in the mill and field operations.</p> <p>During site visit at the POM and audited estates verified that adequate fire extinguishers and hose reels found to be located at strategic locations, operational and maintained in good conditions. In addition, the management also prepared emergency showers and emergency eye wash at strategic locations (e.g., chemical store, laboratory, premix area, fertiliser store, etc.), which also operational and maintained in good conditions.</p> <p>Location map of first aid kits, fire extinguishers, emergency showers and emergency eyewash are available and displayed at strategic area surrounding office and stores.</p> <p>Verified that each operating unit kept its accident records. They will conduct an investigation if there is any workplace accident occur. Furthermore, they will review the accident record during quarterly OSH meetings.</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>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding SDS, safe working practices and the correct use of PPE.</p> <p>Suitable PPE has been provided to the workers based on the HIRARC established, information in the SDS, CHRA assessor’s recommendation, and NRA assessor’s recommendation. During the site visit, the PPE were adequately implemented, e.g., Sterilizer Station, Press Station, loading ramp, oil room, boiler, manuring, harvesting, and spraying. Based on interviews with workers, each</p>	Non-compliance

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		<p>PPE they received was free, and the management did not charge any payments for the PPE. If there is any damage or it is time to change to new PPE, the worker only needs to bring the used PPE to the management and the management will issue new PPE to the worker. This PPE issuance will be recorded by the management. The issuance records of the PPE to the workers were sighted during the audit. Used PPE will be collected by management for disposal. The record for PPE Issuance were sighted.</p> <p>The management provides adequate shower rooms and soap for employees' use after returning from activities involving chemical application. Lockers are also provided for the convenience of employees to keep clean clothes for them to use to go home. To ensure that no PPE is taken home, the management has provided an area to wash and store PPE. Used PPE will be disposed of as scheduled waste, registered as SW410.</p> <p>During a workplace visit at Pamol Kluang POM, as part of the audit, it was noted that two workers were cutting grass using a knapsack grass cutter without wearing any Personal Hearing Protector (PHP). Subsequent interviews with these workers confirmed their awareness of the requirement to wear the PHP, as the management had provided training on this matter. Furthermore, the workers attested to receiving the PHP free of charge. This information was cross verified with the PPE Issuance Record, confirming that the management had indeed supplied Personal Hearing Protectors (PHP) to these two workers as required. Therefore, a Major NC has been raised against this indicator.</p>	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.	All workers, including foreign workers, are provided coverage under the Social Security Organization (SOCSCO). The transition of foreign workers' insurance from the Foreign Workers Compensation Scheme (FWCS) to SOCSCO has been verified and successfully	Complied

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	<p>- Minor compliance -</p>	<p>completed. This change in practice aligns with the guidelines stated in the Employer's Circular No. 3 (2018) issued by the Ministry of Human Resources. The management has demonstrated compliance by making the necessary contributions for the months of Jul-2023, Aug-2023, and Sept-2023. These contributions were made by the HR Department team at the headquarters.</p> <p>Furthermore, workers have access to medical consultations and medications at nearby estate/government/private clinics such as:</p> <ul style="list-style-type: none"> • Pamol Kluang POM, IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate, and IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate: Pamol Timur Estate, Clinic MyDoctor Clinic, Saideepa Clinic, Suba Clinic, Poliklinik Intan, Panel Clinic (VMO) named Renggam Clinic at Kluang, Hospital Kluang. • Mamor Estate: Estate Clinic, Panel Clinic (VMO) named Renggam Clinic at Kluang, Hospital Kluang. • Swee Lam Estate: Estate Clinic, Panel Clinic (VMO) named Klinik Githa at Kulai, Klinik Kesihatan Kulai, Hospital Kulai <p>These healthcare facilities provide the necessary services to cater to the workers' medical needs.</p>	
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>In accordance with the Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning, and Occupational Disease) Regulations 2004 [NADOPOD], which fall under the purview of the Occupational Safety and Health Act of 1994 (Act 514), it is mandatory for the UoC to submit the JKKP 8 form to the Department of Occupational Safety and Health (JKKP) before January 31st each year.</p> <p>The verification process confirmed that the JKKP 8 reports for each operating unit of the UoC were duly submitted to JKKP in January</p>	Complied

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		<p>2023 for the 2022 report through the MyKKP portal. MyKKP portal not only facilitates the submission of reports but also provides access to records from the past five calendar years. Furthermore, it was ascertained that each operating units have diligently maintained records on Lost Time Accident (LTA) metrics as details below:</p> <ul style="list-style-type: none"> • Pamol Kluang POM submitted the JKKP8 Report on 12/01/2023 for 2022 record (Report Ref. No. JKKP 8/113148/2022). • Mamor Estate submitted the JKKP8 Report on 20/01/2023 for 2022 record (Report Ref. No. JKKP 8/111886/2022). • Swee Lam Estate submitted the JKKP8 Report on 12/01/2023 for 2022 record (Report Ref. No. JKKP 8/111854/2022). • IOI Organic Oils (M) Sdn Bhd – Pamol Barat Estate (part of Pamol Barat Estate management) submitted the JKKP8 Report on 12/01/2023 for 2022 record (Report Ref. No. JKKP 8/114846/2022). <p>IOI Organic Oils (M) Sdn Bhd – Pamol Timur Estate (part of Pamol Timur Estate management) submitted the JKKP8 Report on 16/01/2023 for 2022 record (Report Ref. No. JKKP 8/111997/2022).</p>	
<p>Principle 7: Protect, conserve and enhance ecosystems and the environment</p>			
<p>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rats among others. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of</p>	<p>Complied</p>

		<p>leaf eating pests, beneficial plants are being established to attract natural predators and further reduce the outbreak.</p> <p>Beneficial plants such as Turnera subulata and Cassia cobanensis are grown in the estate and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Leaf-eating pest census was regularly carried out to obtain information about threshold level and action to be taken thereafter. Census records were available for verification which has shown the effectiveness of the planting of beneficial plants to reduce the leaf eating caterpillars.</p> <p>Mamor Estate and Swee Lam Estate</p> <p>For Pest & Disease (P&D), census was carried out for rat damage on annual basis. Recent rat census at all estates assessed results showed attack were below threshold limit of 5%. The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the SOP operation. Latest updates on Barn Owl Census record conducted on June 2023 with ratio 1:10 and Occupancy rates was 72.49%.</p> <p>IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate and Pamol Timur Estate.</p> <p>For rat control, organic farm practice Dog Hunting method to control the population of rat in the field. As per their SOP stated on Dog-assisted rat hunting is a novel solution to control the populations of rats. The efficacy of dog-assisted rat hunting has proven to reduce the rat populations and crops damaged in the field. This approached assist the existence biological approached by barn owl, the rat natural predators. Increasing the number and group of well-trained dogs for rat hunting, aided by two dog masters, will be a good solution for covering a larger range and increasing the dog hunting</p>	
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round in the plantation. A qualified veterinary doctor will check the dog's health on a regular basis. The control of rats by these approaches is consider more effective and cost-efficient. Verification at Pamol Barat Estate, there are 16 dogs under supervised by 2 workers. Sighted evidence on monitoring the healthcare of the dos. Latest vaccination sighted on 22/11/2023. Training with veterinary has been conducted on 22/11/2023. Sighted evidence of Training material, attendance, and photos.

For Barn Owl, there are 57 boxes was installed in the Organic Farm Pamol Barat Estate and 75 boxes was installed at Organic farm Pamol Timur Estate. Refer report title Organic Field – Barn Owl Census September 2023 Summary. Refer table below:

Estate	Boxes	Occupancy rate, %	Ratio Land: Box
PTE	57	71.93	1:7.72
PBE	75	94.67	1:9.17

Refer Summary report by Agronomist Entomology/Zoology Pamol Research Station as below:

1. The constant increase in the occupancy rate are positive indicator of a healthy and growing barn owl population.
2. The occupancy rate above 50% occupancy is often suggested as a sign of success in owl nest box programs.
3. The significant number of eggs indicates that the boxes are not only being occupied but are also being used for breeding, a clear sign of a thriving population.

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- 4. However, the need for numbering new barn owl boxes must be addressed to ensure accurate tracking and monitoring in future censuses.
- 5. An organized numbering system allows for precise data collection, including individual owl identification, breeding success, and box usage trends, contributing to more effective management and conservation strategies.

A high commitment is required not to use chemical herbicide in organic fields and neighbouring nonorganic buffer rows. Palm circles have to maintain weed free in order to collect loose fruits. The maintenance of palm circle in organic cultivation is by non-chemical means. Mechanical weeding of palm circles and Tractor mounted rotor slasher to use for inter-row and harvesting path weeding control. Other than that, estates was practiced buffalo grazing. Sample Buffalo Grazing record was verified as below:

IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate

Date	Field	Area Covered	Buffalo
21/09/2023	16G	2.00	28
23/09/2023	16G	1.00	28
06/11/2023	14E	10.00	28
29/11/2023	16J	5.00	28
11/10/2023	16G	1.00	28
28/10/2023	12E	10.00	28

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		IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate																													
		<table border="1"> <thead> <tr> <th>Date</th> <th>Field</th> <th>Area Covered</th> <th>Buffalo</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>PM11D</td> <td>36.00</td> <td>40</td> </tr> <tr> <td>February</td> <td>PM12A&B</td> <td>54.00</td> <td>40</td> </tr> <tr> <td>March</td> <td>PM12C&D</td> <td>76.00</td> <td>40</td> </tr> <tr> <td>April</td> <td>PM12B&D</td> <td>62.00</td> <td>40</td> </tr> <tr> <td>May</td> <td>PM11D&12A</td> <td>75.00</td> <td>40</td> </tr> <tr> <td>June</td> <td>PM11C,D&12 E</td> <td>52.00</td> <td>40</td> </tr> </tbody> </table>	Date	Field	Area Covered	Buffalo	January	PM11D	36.00	40	February	PM12A&B	54.00	40	March	PM12C&D	76.00	40	April	PM12B&D	62.00	40	May	PM11D&12A	75.00	40	June	PM11C,D&12 E	52.00	40	
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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 -	There were no species referenced in the Global invasive Species database and CABI.org sighted within the estate and POM premises.	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 -	From the site verification and interview with workers, not sighted any open burning or use fire for pest control in all sampling estate under Pamol Kluang POM certification unit.	Complied																												
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																															
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	Each estate of Pamol Kluang POM & Supply Bases continued to use agrochemicals based on the Justification of Chemicals Used in Estate for various fields operations. The manual has included the chemicals list which indicates the purpose of usage (intended	Complied																												

	<p>- Critical (Major) compliance -</p>	<p>target), active ingredients names as well as the specific targets. Among types of pesticides used with justifications included:</p> <ul style="list-style-type: none"> • <i>Glyphosate Isopropylamine 41%,</i> • <i>2,4-D Methyl Amine 60%,</i> • <i>Metsulfuron Methyl 20%,</i> • <i>Triclopyr Butoxy Ethyl Ester 32%,</i> • <i>Brodifacoum 0.005%</i> • <i>Imazethapyr 70%</i> • <i>MSMA 47%</i> • <i>Cypermethrine 16%</i> • <i>Glyphosate monoammonium 33.6%</i> • <i>Carbosulfan 5%</i> • <i>Glyphosate potassium 48.7%</i> <p>All chemicals usage was based on the “need to do basis” to enhance field operations. Specific pesticides had been used to deal with the respective target pest, weed, or disease. It was found that no Class I chemicals had been used.</p> <p>The pesticide management practices employed by the entity adhere to regulatory standards and reflect a comprehensive approach to ensure responsible and legal pesticide use. The following key points outline the management protocol:</p> <ul style="list-style-type: none"> • Compliance with Pesticide Regulations: All pesticides used are officially registered under the Pesticide Act 1974, demonstrating compliance with relevant regulatory frameworks. 	
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		<ul style="list-style-type: none"> • Limited Classes of Pesticides: Pesticide usage is confined to only Class II, Class III, and Class IV pesticides, aligning with established safety and environmental classifications. • Avoidance of Illegal Agrochemicals: The management affirms a commitment to legal and responsible practices by explicitly stating that no illegal agrochemicals, such as paraquat, are used in the estates. This adherence is emphasized in accordance with both local and international laws. • Standard Operating Procedures (SOP) and Guidelines: The utilization of agrochemicals is guided by the Standard Operating Procedure under Subject 7.1 Weeding - Weeds & Weeding and the Agrochemical Management Guidelines dated 28/08/2020 (ref IOI/GG/SE/102). Written justifications are provided for various field operations, ensuring a systematic and documented approach to pesticide use. • Chemical Register List in SOP: The SOP incorporates a chemical register list, specifying the use of selective products tailored to target pests, weeds, or diseases. This practice promotes precision and minimizes environmental impact. Procedures within the SOP also address the proper use of Personal Protective Equipment (PPE) during chemical handling, emphasizing safety protocols. • Continued Adherence to SOP: The estates consistently use pesticides following the guidelines outlined in the SOP, ensuring a standardized and regulated approach to their application. • Centralized Pesticide Purchases: Pesticide acquisitions are centrally managed through a regional office arrangement, providing organizational control over purchases. This centralized approach enhances oversight, streamlines 	
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		<p>procurement processes, and facilitates better control over the types and quantities of pesticides acquired.</p> <p>The outlined pesticide management protocol reflects a commitment to legal compliance, safety, and environmental responsibility. The integration of SOPs, selective product usage, and centralized procurement mechanisms collectively contribute to a structured and accountable approach in managing pesticide activities within the organization.</p>	
<p>7.2.2</p>	<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 estates have records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</p> <p>a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. Records of pesticides used were available and verified.</p> <p>b) All pesticides used were those officially registered under the Pesticide Act 1974. The estates had used only Class II, Class III & Class IV pesticides.</p> <p>c) No illegal agrochemicals (stated by local and international laws) were used in their estates.</p> <p>Variation of chemical usage are attributed to sizes of immature areas, rainfall pattern and the regeneration growth of weeds in different type of soil series.</p> <p>Records of pesticides and their active ingredients used, LD50, area treated, amount of active ingredients applied per ha, and number</p>	<p>Complied</p>

		<p>of applications had been maintained. The types of pesticides used as follow:</p> <ul style="list-style-type: none"> • <i>Glyphosate Isopropylamine 41%,</i> • <i>2,4-D Methyl Amine 60%,</i> • <i>Metsulfuron Methyl 20%,</i> • <i>Triclopyr Butoxy Ethyl Ester 32%,</i> • <i>Brodifacoum 0.005%</i> • <i>Imazethapyr 70%</i> • <i>MSMA 47%</i> • <i>Cypermethrine 16%</i> • <i>Glyphosate monoammonium 33.6%</i> • <i>Carbosulfan 5%</i> • <i>Glyphosate potassium 48.7%</i> <p>Verified that records of monitoring of said pesticides were available and satisfactorily maintained.</p>	
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 policy of the estates was to systematically minimize the use of pesticides in accordance with IPM plan. The estate continues to implement cultural/biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estate include monitoring of pest numbers and the use of triggers for initiation of control measures.</p> <p>Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along main roads and block boundaries to attract natural predators. The estate has established</p>	Complied

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		<p>IPM program. The plan was reviewed on annually basis. The IPM consist of Planting Beneficial Plant, Rat damage census, and Ganoderma census.</p> <p>The pesticide reduction program is monitored on usage per hectare basis.</p>	
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>Based on the site visit, records review (Register of Chemicals Hazardous to Health), and interview with chemical handlers, it verified that there was no prophylactic use of pesticides at the 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> <ol style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>The chemical register management practices at the mill and sampled estates reflect a systematic and compliant approach to pesticide handling. The following points highlight the key aspects:</p> <ul style="list-style-type: none"> • Availability and Verification of Chemical Registers: <ul style="list-style-type: none"> - Chemical registers for the mill and sampled estates were available for verification during the audit. - The registers are reviewed yearly and updated when new chemicals are introduced into operations. • Classification of Pesticides: <ul style="list-style-type: none"> - The registers consistently demonstrated that all pesticides used were of Class II, Class III, and Class IV. - Prohibition of paraquat usage across all IOI estates was noted and confirmed in the chemical registers. • Permit for Highly Toxic/Limited Pesticides: 	Complied

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		<ul style="list-style-type: none"> - For the usage of highly toxic or limited pesticides, the estates acquire permits from the Department of Agriculture, showcasing a commitment to regulatory compliance. • Emergency Preparedness: <ul style="list-style-type: none"> - Safety Data Sheets (SDS) for pesticides were placed in the chemical store for emergency purposes. - Emergency eye wash facilities at the chemical store were confirmed to be functional, ensuring preparedness for potential emergencies. • Compliance with Regulations: <ul style="list-style-type: none"> - Pesticide usage is in accordance with the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A), as well as the USECHH Regulations 2000. • Avoidance of Highly Hazardous Pesticides: <ul style="list-style-type: none"> - No evidence was found of the usage of pesticides categorized as World Health Organization Class 1A or 1B. - Pesticides listed by the Stockholm or Rotterdam Conventions were also not used. • Training and Legal Requirements: <ul style="list-style-type: none"> - Training sessions were conducted with all necessary precautions, meeting legal requirements. - Records and interviews with workers, staff, and estate assistants confirmed the adherence to legal standards during training. • IOI Group Policy on <i>Paraquat</i> Elimination: 	
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		<ul style="list-style-type: none"> - The usage of <i>paraquat</i> had been eliminated in accordance with IOI Group Policy. - Paraquat was replaced by contact or systemic herbicides, including <i>Glyphosate Isopropylammonium</i>, <i>Triclopyr-Butotyl</i>, <i>2,4-D-Dimethylammonium</i>, <i>Indaziflam</i>, <i>Monosodium Methanearsonate (MSMA)</i>, <i>1,1-Dimethyl, 3-(3',4'-Dichlorophenyl) Urea (DCMU)</i>, <i>Glufosinate Ammonium</i>, <i>Metsulfuron-Methyl</i>, <i>Sodium Chlorate</i>, etc. • Categorization of Chemicals: <ul style="list-style-type: none"> - Except for <i>2,4-D-Dimethylammonium</i> and <i>Cypermethrin</i>, classified as Class II chemicals, all others were of Class III & IV. • Commitment to Responsible Practices: <ul style="list-style-type: none"> - The overall conclusion is that the estates, including Pamol Kluang POM & Supply Bases, have not used pesticides categorized as World Health Organisation Class 1A or 1B, or listed by the Stockholm or Rotterdam Conventions, and paraquat. <p>The outlined practices and adherence to policies showcase a commitment to responsible chemical management, safety, and compliance with regulatory standards across the IOI Group's estates.</p>	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6).</p>	<p>All pesticide operators had attended training on the safe handling and application of pesticides in compliance with Regulation 22 of the Pesticides Act 1974. Sampled related training records as below:</p>	Complied

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	<p>Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • Mamor Estate: SaOP Chemical Store and Spill Kit (03/05/2023), Chemical Usage Training (15/11/2023), ERT/ERP (17/08/2023), Buffer Zone (03/05/2023), IPM – beneficial plants (02/08/2023) • Swee Lam Estate: Emergency Response Plan (22/03/2023), Chemical Spraying SaOP (15/06/2023), SaOP Rat-baiting Application (01/11/2023), SaOP Management of Chemical Stores and Spill Kit (28/04/2023), IPM – Barn Owl Management (12/09/2023), Spraying Pump Calibration (19/10/2023) <p>The training includes spraying technique, precautions, and symptoms of toxic reactions such as skin disorders, rashes, mouth, and throat pain, breathing difficulties or nail problems.</p> <p>Appropriate safety and application equipment (safety boots, safety helmets, rubber boots, cartridge masks, safety goggles, gloves, aprons, and raincoat-type long trousers) had been provided and used by the pesticide’s operators.</p> <p>All precautions attached to the pesticides (SDS) had been observed, applied, and understood by the workers.</p> <p>During site visit, First Aid Kits were found to be available during pesticides spraying in the fields (4th Schedule) and Portable signboard noted to be displayed at areas of spraying activity (5th Schedule).</p> <p>Programmes and training records verified to be satisfactory.</p> <p>The UoC has adequate facilities for mixing of pesticides and cleaning up after work. There are suitable storage areas for PPE.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p>	<p>The UoC is adopted procedure established by IOI i.e., Safe Work Procedure – Storage and Management of Chemical Stores (Doc. Ref. IOI-OSH 3.2.2, Rev. No. 05, Appendix 6(8-A), dated 06-Jan-2020).</p>	Complied

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	- Critical (Major) compliance -	<p>Training related to the procedure was conducted at Mamor Estate on 03/05/2023, and Swee Lam Estate on 28/04/2023.</p> <p>Storage of pesticides found to be kept under lock and key and its use in accordance with the Occupational Safety and Health Laws and Regulation 9 of the Pesticides Act 1974.</p> <p>Chemicals were mixed in the pre-mixing areas of the store that was under lock and key.</p> <p>Emergency shower and eye wash were available at the pesticides store in case of accidents. The water pressure was noted to be sufficient for such purpose.</p> <p>Safety Data Sheets (SDS) were available in the stores. The SDS are in English and Bahasa Malaysia (understood by the workers).</p>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Used chemical containers were either reused as containers for spraying solution or disposed of as recycled waste. For disposal, empty pesticide containers are triple rinsed and pierced at the bottom, later stored in the empty container store. At estate of the UoC, record on the disposal and recycle of chemical containers and fertiliser bags was also made available during the audit. Records on the usage and disposal were well recorded and documented. Recyclables sold as scrap to SS Setia Teknologi Enterprise. Latest disposal conducted in October 2023.</p>	Complied
7.2.9	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The policy of IOI Group was not to carry out any aerial application of pesticides. Based on documentation reviews (chemical usage records, chemical register, justification of pesticides, chemical bin cards, chemical stock purchase), site visits, and interview with relevant personnel (storekeeper, workers, etc.), it was noted that each estate of the UoC had not practicing the aerial spraying. Therefore, this policy has been found to be adhered at the UoC.</p>	Complied

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7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Each estate of the UoC employs its own workers for pesticide spraying, and no contractor's workers are involved in this activity. All chemical handlers are required to undergo annual medical surveillance. The annual medical surveillance adheres to the requirements outlined in Schedule 1 and 2 of the OSHA USECHH 2000 regulations, ensuring compliance with health and safety standards for pesticide operators.</p> <p>During audit conducted, the medical surveillance reports of individual sprayers were thoroughly examined, revealing no abnormalities reported by the attending medical doctor. The medical reports further indicated the absence of cases involving low blood cholinesterase levels, a condition that renders workers unfit for pesticide-related tasks. Up to the date of the audit, no such cases were recorded in the UoC records.</p> <p>Moreover, the pesticide operators were checked and interviewed during the field visit, confirming that they did not exhibit any symptoms of toxic reactions, such as skin disorders, rashes, mouth and throat pain, breathing difficulties, or nail problems.</p> <p>It has been duly verified that the recommendations specified in the CHRA report have been satisfactorily implemented and followed by the estate.</p>	Complied
7.2.11	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p><u>Persons under the age of 18:</u></p> <p>A formal policy for the protection of children exists in IOI Group Sustainable Oil Palm Policy (SPOP) signed by Chief Executive Officer and Group Head of Sustainability (revised October 2020). Paragraph 4 under Subparagraph of Human Rights and Workplace of the Policy states that the Company would eliminate all forms of child labour.</p>	Complied

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		<p>There was no evidence that the UoC employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit. A documented age screening verification procedure exists where details of the workers' passport and IC and dates of birth are reviewed and verified before issuance of employment contracts.</p> <p>Copies of identity cards and passports were sampled and verified during the audit. This were further reviewed during the worker interview and site visit.</p> <p><u>Pregnant or breastfeeding women:</u></p> <p>Pamol Kluang POM & Estates Grouping are bound by IOI's Guidelines on Reproductive Health (Doc Ref: IOI/G/SE/ 002 dated 05-Oct-2020) states:</p> <ul style="list-style-type: none"> • Paragraph 4.1.2 of the Guidelines states that the Estate's Health Assistants (EHA) are to carry out urine pregnancy test at 3 months interval for general workers, and at monthly intervals for chemical handlers, upon workers' consent. • Paragraph 4.1.3 of the Guidelines states that the management shall reassign the pregnant workers with tasks which are appropriate for pregnant women. <p>After conducting a thorough verification process that included reviewing records, on-site field inspections, and interviews, it has been confirmed that no pregnant or breastfeeding women have been offered work as pesticide handlers or operators at the estate. This observation aligns with the fact that all pesticide handlers and operators at the estate are male. Thus, there is no evidence or indication of pregnant or breastfeeding women being engaged in</p>	
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		<p>pesticide-related tasks, ensuring compliance with appropriate health and safety considerations.</p> <p><u>People that have medical restrictions:</u></p> <p>The UoC is complying with the Part X (Medical Removal Protection) – Regulation 28. Medical removal protection of Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000, which states:</p> <ul style="list-style-type: none"> a. The employer shall not permit an employee to be engaged in and shall remove him from any work that exposes or likely to expose him to chemicals hazardous to health on each occasion that the medical finding, determination or opinion expressed by an occupational safety and health officer who is also a medical practitioner or by an occupational health doctor shows that the employee has a detected medical condition which places him at increased risk of material impairment to health from exposure to chemicals hazardous to health. b. The employer, after being notified by an occupational safety and health officer who is also a medical practitioner or an occupational health doctor of the fact, shall not permit a pregnant employee or breastfeeding employee to be engaged in, and shall remove the employee from work which may expose or is likely to expose the employee to chemicals hazardous to health. c. The employer shall return an employee to his former job - <ul style="list-style-type: none"> i. for an employee removed in accordance with subregulation (1) when a subsequent medical determination results in a medical finding, determination or opinion which shows that 	
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		<p>the employee no longer has the detected medical condition; or</p> <p>ii. for an employee removed in accordance with subregulation (2) at the appropriate time where the employee is no longer pregnant or breastfeeding a child.</p> <p>d. For the purpose of this regulation, "medical practitioner" means a medical practitioner registered under the Medical Act 1971 [Act 50].</p> <p>Following the guidance outlined in the CHRA report, employees involved in tasks related to chemicals are required to undergo annual medical surveillance. If there a case where a worker indicates he/she is "Not Fit To Work," the OHD will then suggest "Medical Removal" for that particular individual.</p> <p>However, based on the latest results from medical surveillance, it has been determined that all employees are fit to work. Therefore, the OHD has not made any recommendations for "Medical Removal" based on the current assessments.</p>			
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>					
<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>Waste management Plan has been established and detailed in the Environmental Action Plans & Continuous Improvement plan dated 12/11/2023 under section Schedule Waste, Domestic & Recyclable waste.</p> <p>Among the Waste Management and Reduction Plan sampled were as follows:</p> <table border="1" data-bbox="1137 1286 1928 1342"> <tr> <td data-bbox="1137 1286 1355 1342">Impacts</td> <td data-bbox="1355 1286 1928 1342">Action Plan</td> </tr> </table>	Impacts	Action Plan	<p>Complied</p>
Impacts	Action Plan				

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		Spilling of SW such as spent oil from the store	Provide SOP working. Use spill kit and drip trays in the SW Store		
		Pollution to natural stream may affect the ecosystem	Awareness Training. Provide bund system to serve a purpose to separate the whole store Area		
		Domestic Waste	Accumulation and burying of domestic waste in landfill		
		Clinical waste	Dispose the waste through Cenviro. Label SW as regulation		
		<p>Wastes management plan is developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. The Waste Management Plans 2023/2024 were established to mitigate and control the identified waste and source of pollution. Generally, the scheduled waste was disposed through licensed vendors, organic wastes were disposed through government landfill and recyclable wastes were sent to recycle contractors. All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2023.</p> <p>For IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate and Pamol Timur Estate was not generated any schedule waste since there is no chemical application in the field. Otherwise, based on interview, workers was aware on the management of schedule waste.</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>Procedure of Schedule waste management has been established. Refer Waste Management Procedure for Estates & Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes In Malaysia.</p> <p>Awareness training on Schedule waste has been conducted as per date below:</p> <ul style="list-style-type: none"> • Mamor Estate: 02/08/2023 • Swee Lam Estate: 22/06/2023 • IOI Organic Oil (M) Pamol Barat Estate: 27/06/2023 • IOI Organic Oil (M) Pamol Timur Estate: 09/08/2023 • Pamol Kluang POM: 13/05/2023 <p>Generally, the workers have demonstrated good understanding in proper disposal of wastes.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p><u>Mamor Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: AS(B)J11/123/000/116 • Date Reporting: July 2023 • Waste Generated: SW103, SW104, SW109, SW110, SW305, SW312, SW404, SW408, SW409, SW410. <p><u>Disposal</u></p>	<p>Complied</p>
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		<p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2023070509MAP8TC Date Disposal: 06/07/2023 SW408 – Contaminated Soil, 0.0074 MT disposed by Kualiti Alam Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 2023070509HSCN5Q Date Disposal: 06/07/2023 SW305 – Spent Lubricating Oil, 0.0166 MT disposed by Kualiti Alam Sdn Bhd <p><u>Swee Lam Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: AS(B)J11/123/000/097 Date Reporting: Nov 2023 Waste Generated: SW104, SW110, SW305, SW312, SW404, SW409, SW410, SW429. <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 20231124122WTRLH Date Disposal: 24/11/2023 SW409 – Empty Container, 0.2500 MT disposed by Kualiti Alam Sdn Bhd 	
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		<p><u>Pamol Kluang POM</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: JAS.JKL.00-3/1/33 • Date Reporting: Oct 2023 • Waste Generated: SW103, SW104, SW109, SW110, SW305, SW306, SW409, SW410, SW429. <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2023073109TVY0B1 • Date Disposal: 31/07/2023 • SW103 – Used Batteries, 0.0004 MT disposed by Kualiti Alam Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> • Disposal consignment note: 2023073109ZWBCPO • Date Disposal: 31/07/2023 • SW104 – Used Welding Electrode, 0.0288 MT disposed by Kualiti Alam Sdn Bhd <p>For IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate and Pamol Timur Estate was not generated any schedule waste since there is no chemical application in the field. The management on schedule waste was handled by the Pamol Barat Estate and Pamol Timur Estate.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	Not sighted any open burning as per visit to the estates field and housing compound in Pamol Kluang POM and supply base confirmed	Complied

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	<p>- Minor compliance -</p>	<p>that no open fire were been use for waste disposal. IOI has a policy of no open burning. As advocated, the estate practiced zero burning. In the replants visited during the audit in the Estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p> <p>There was no evidence of fire used for waste disposal estate visited. Domestic waste was collected and disposed at Municipal Council bin.</p>	
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
<p>7.4.1</p>	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>IOI group has established Standard Operation Procedure (StOP) to manage soil fertility. The StOP was revised in March 2020. Among the StOP as follows:-</p> <ol style="list-style-type: none"> 1. Leguminous Cover Plant Manuring, document ref. no. IOI/SOP/A/08 2. Manual fertilizer Application for immature and mature palm, document ref. no. IOI/SOP/A/09 3. Wheelbarrow fertilizer application for immature and mature palm, document ref. no. IOI/SOP/A/10 4. Buffalo assisted Manuring for immature and mature palm, document ref. no. IOI/SOP/A/11 5. Semi mechanized manuring for mature palm, document ref. no. IOI/SOP/A/12 6. Empty fruit bunch (EFB) Mulching, document ref. no. IOI/SOP/A/13 	<p>Complied</p>

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		<p>7. Palm Oil Mill Effluent (POME) Application, document ref. no. IOI/SOP/A/14</p> <p>8. Fertilizer Sampling for Analysis, document ref. no. IOI/SOP/A/15</p> <p>Planning and Organization of fertilizer application, document ref. no. IOI/SOP/A/16</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic foliar sampling analysis was last conducted in 2022/2023 for the sampled estates to monitor the changes in nutrient status. The results of the analysis were used by the agronomist for their recommendation for fertilizers applications programmed. The soil analysis is done once in 5 years. This analysis was followed as per SOP's established. Analysis reports were made available for verification as per below:</p> <p>Mamor Estate</p> <p>Soil analysis and Foliar analysis has conducted by IOI Research Centre and details was reported in the Agronomist Report dated 24/05/2023</p> <p>Swee Lam Estate</p> <p>Soil analysis and Foliar analysis has conducted by IOI Research Centre and details was reported in the Agronomist Report dated 25/07/2023.</p> <p>IOI Organic Oil (M) Pamol Barat Estate</p> <p>Soil analysis and Foliar analysis has conducted by IOI Research Centre. Refer Soil (Organic Farming) Test Report dated 23/03/2023 with reference number SR/PBE/03/23/001. Refer Foliar Plant</p>	Complied

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		<p>(Organic farming) Test Report dated 23/03/2023 with reference number PR/PBE/03/23/001.</p> <p>IOI Organic Oil (M) Pamol Timur Estate</p> <p>Soil analysis and Foliar analysis has conducted by IOI Research Centre. Refer Soil (Organic Farming) Test Report dated 23/03/2023 with reference number SR/PTE/03/23/002. Refer Foliar Plant (Organic farming) Test Report dated 23/03/2023 with reference number PR/PTE/03/23/002.</p>																			
<p>7.4.3</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Pamol Kluang POM. The best practice of EFB application is described in the StOP. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/ha. Refer record below:</p> <p>Mamor Estate</p> <table border="1" data-bbox="1137 927 1930 1126"> <thead> <tr> <th>Field</th> <th>Hectarage, Ha</th> <th>To date MT Applied</th> </tr> </thead> <tbody> <tr> <td>99C</td> <td>10.00</td> <td>45.67</td> </tr> <tr> <td>PR22B</td> <td>16.00</td> <td>451.27</td> </tr> <tr> <td>PR22A</td> <td>15.00</td> <td>213.25</td> </tr> </tbody> </table> <p>IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate. For this organic field, there is only application of EFB as a fertiliser. The application record as below:</p> <table border="1" data-bbox="1137 1241 1930 1385"> <thead> <tr> <th>Year</th> <th>To date MT Applied</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>17,381.76</td> </tr> <tr> <td>Tdt Oct 2023</td> <td>19,866.50</td> </tr> </tbody> </table>	Field	Hectarage, Ha	To date MT Applied	99C	10.00	45.67	PR22B	16.00	451.27	PR22A	15.00	213.25	Year	To date MT Applied	2022	17,381.76	Tdt Oct 2023	19,866.50	<p>Complied</p>
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		<p>IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate. For this organic field, there is only application of POME as a fertilizer. The application records as below:</p> <table border="1" data-bbox="1137 475 1919 624"> <thead> <tr> <th>Year</th> <th>POME, MT</th> <th>Boiler Ash, MT</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>2708.35</td> <td>622.24</td> </tr> <tr> <td>Tdt Oct 2023</td> <td>8926.81</td> <td>1588.21</td> </tr> </tbody> </table> <p>There is no application of EFB at Swee Lam Estate.</p> <p>Pamol Kluang POM discharge POME through furrow after treated as per "Jadual Pematuhan" No:004723. Signage on "Takat Pelepasan" was maintained at Mill has conducted water sampling at final discharge.</p> <p>EFB management was according to Jadual Pematuhan DOE with reference number 004723. Monthly inventory of EFB has been submitted to DOE latest on 04/11/2023 with reference number DOE/RS/2023.</p>	Year	POME, MT	Boiler Ash, MT	2022	2708.35	622.24	Tdt Oct 2023	8926.81	1588.21		
Year	POME, MT	Boiler Ash, MT											
2022	2708.35	622.24											
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program is based on the recommendation by Agronomist from IOI Research Centre and documented in Fertilizer Recommendation Report. Observed the recommendation and implementation record completed for all estates, documented in the Monitoring Record – Fertiliser Usage which was available for verification.</p> <p>Mamor Estate</p> <table border="1" data-bbox="1137 1233 1919 1378"> <thead> <tr> <th>Field</th> <th>Fertilizer</th> <th>Amount, MT</th> <th>Program</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>02A</td> <td>NK Mixture</td> <td>386.40</td> <td>Jan 2023</td> <td>Completed</td> </tr> </tbody> </table>	Field	Fertilizer	Amount, MT	Program	Status	02A	NK Mixture	386.40	Jan 2023	Completed	Complied
Field	Fertilizer	Amount, MT	Program	Status									
02A	NK Mixture	386.40	Jan 2023	Completed									

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		09C	Kieserite	0.24	Mar 2023	Completed	
		Swee Lam Estate					
		Field	Fertilizer	Amount, MT	Program	Status	
		PM93B	RP	386.40	Jan 2023	Completed	
		09C	Kieserite	0.24	Mar 2023	Completed	
		For fertilizer application at IOI Organic Oil (M) Pamol barat Estate was using EFB while at IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate was using POME and Boiler Ash. Records of application was verified as per recommendation by Agronomist.					
		IOI Organic Oil (M) Pamol Barat Estate - EFB					
		Month		To date MT Applied			
		January		1000.39			
		February		1877.09			
		March		1751.05			
		April		1238.98			
		May		2314.63			
		June		2744.72			
		July		2195.95			
		August		2365.87			
		September		2299.46			

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		<table border="1"> <tr> <td>October</td> <td colspan="2">2078.36</td> </tr> <tr> <td colspan="3">IOI Organic Oil (M) Pamol Timur Estate – POME & Boiler Ash</td> </tr> <tr> <td>Month</td> <td>POME, MT</td> <td>Boiler Ash, MT</td> </tr> <tr> <td>January</td> <td>508.57</td> <td>139.74</td> </tr> <tr> <td>February</td> <td>116.25</td> <td>98.80</td> </tr> <tr> <td>March</td> <td>287.81</td> <td>192.06</td> </tr> <tr> <td>April</td> <td>609.55</td> <td>116.78</td> </tr> <tr> <td>May</td> <td>1116.81</td> <td>109.08</td> </tr> <tr> <td>June</td> <td>973.82</td> <td>120.00</td> </tr> <tr> <td>July</td> <td>2008.84</td> <td>178.78</td> </tr> <tr> <td>August</td> <td>1171.98</td> <td>197.40</td> </tr> <tr> <td>September</td> <td>639.91</td> <td>247.00</td> </tr> <tr> <td>October</td> <td>1493.27</td> <td>188.57</td> </tr> </table>	October	2078.36		IOI Organic Oil (M) Pamol Timur Estate – POME & Boiler Ash			Month	POME, MT	Boiler Ash, MT	January	508.57	139.74	February	116.25	98.80	March	287.81	192.06	April	609.55	116.78	May	1116.81	109.08	June	973.82	120.00	July	2008.84	178.78	August	1171.98	197.40	September	639.91	247.00	October	1493.27	188.57	
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																																										
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soil, including steep terrain were available for verification. Soil series map were available for all estates visited prepared by the IOI Research Centre.</p> <p>Mamor Estate</p> <table border="1"> <tr> <td>Soil Type</td> <td>Percentage, %</td> </tr> <tr> <td>Beserah</td> <td>5.66</td> </tr> <tr> <td>Bukit Batu</td> <td>1.84</td> </tr> </table>	Soil Type	Percentage, %	Beserah	5.66	Bukit Batu	1.84	Complied																																	
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		Bungor	6.57	
		Camp	1.00	
		Chat	0.76	
		Gajah Mati	8.90	
		Gong Chenak	10.24	
		Local Aluvium	4.20	
		Malacca	12.34	
		Munchong	1.86	
		Rengam	45.52	
		Tavy	1.11	
		Swee Lam Estate		
		Soil Type	Percentage, %	
		Jerangau	39.28	
		Rengam	60.72	
		IOI Organic Oil (M) Pamol Barat Estate		
		Soil Type	Percentage, %	
		Burgor	4.00	
		Chat	1.00	
		Durian	3.00	
		Gajah mati	46.00	

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		<table border="1"> <tr> <td>Guan</td> <td>22.00</td> </tr> <tr> <td>Harimau</td> <td>11.00</td> </tr> <tr> <td>Katong</td> <td>1.00</td> </tr> <tr> <td>Setol</td> <td>10.00</td> </tr> <tr> <td>Terap</td> <td>1.00</td> </tr> <tr> <td colspan="2">IOI Organic Oil (M) Pamol Timur Estate</td> </tr> <tr> <td>Soil Type</td> <td>Percentage, %</td> </tr> <tr> <td>Asahan</td> <td>1.00</td> </tr> <tr> <td>Batu Anam</td> <td>1.00</td> </tr> <tr> <td>Bungor</td> <td>49.00</td> </tr> <tr> <td>Durian</td> <td>31.00</td> </tr> <tr> <td>Harimau</td> <td>5.00</td> </tr> <tr> <td>Kerayong</td> <td>6.00</td> </tr> <tr> <td>Kuala Brang</td> <td>4.00</td> </tr> <tr> <td>Rengam</td> <td>1.00</td> </tr> <tr> <td>Tebok</td> <td>1.00</td> </tr> </table>	Guan	22.00	Harimau	11.00	Katong	1.00	Setol	10.00	Terap	1.00	IOI Organic Oil (M) Pamol Timur Estate		Soil Type	Percentage, %	Asahan	1.00	Batu Anam	1.00	Bungor	49.00	Durian	31.00	Harimau	5.00	Kerayong	6.00	Kuala Brang	4.00	Rengam	1.00	Tebok	1.00	
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7.5.2	<p>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.</p> <p>- Minor compliance -</p>	<p>Addressed in StOP for land Preparation for New Planting and Re-Planting, refer document no. IOI/SOP/A/05 issue date 2007 revision March 2020 under section 6.5: Construction of new Roads: Hilly to steep terrain ($\leq 25^\circ$ slope) stated as follows: "No planting/terracing shall be carried out at very steep terrains ($\geq 25^\circ$ slope)".</p> <p>Record verification as per below:</p>	Complied																																

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Estate	Degree	Percentage, %
Mamor Estate	0°-2°	15.64
	2°-6°	61.54
	6°-12°	20.31
	12°-15°	0.73
	15°-25°	1.78
	≥25°	0.00
Swee Lam Estate	0°-2°	17.94
	2°-6°	62.99
	6°-12°	18.53
	12°-15°	0.47
	15°-25°	0.07
	≥25°	0.00
IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate	0°-2°	26.07
	2°-6°	66.42
	6°-12°	7.45
	12°-15°	0.06
	15°-25°	0.00
	≥25°	0.00
	0°-2°	18.35

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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate</td> <td style="width: 20%;">2°-6°</td> <td style="width: 30%;">62.57</td> </tr> <tr> <td></td> <td>6°-12°</td> <td>18.48</td> </tr> <tr> <td></td> <td>12°-15°</td> <td>0.50</td> </tr> <tr> <td></td> <td>15°-25°</td> <td>0.10</td> </tr> <tr> <td></td> <td>≥25°</td> <td>0.00</td> </tr> </table> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop Mucuna Bracteata had been planted along crucial slopes by management. Large areas with Nephrolepis Biserrata in the inter rows were sighted during the visit.</p>	IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate	2°-6°	62.57		6°-12°	18.48		12°-15°	0.50		15°-25°	0.10		≥25°	0.00	
IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate	2°-6°	62.57																
	6°-12°	18.48																
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	≥25°	0.00																
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>Based on field visit at Sampled estates, it was verified that there was no new planting of oil palm sighted on steep terrain.</p>	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.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series map were available for all estates visited prepared by the IOI Research centre which still same as verified during the previous audit. No marginal and fragile soils identified in all estates in Pamol Kluang Region. During field visit at the sampled estate sighted there was no palm oil planting on steep terrain. On the other hand, land terrain, drainage and road systems during planning were evident.</p>	Complied															

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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.</p> <p>- Minor compliance -</p>	<p>Planting on marginal and fragile soils is avoided in conformance with IOI Procedure SOP for land Preparation for Management of Oil Palm on Peatland Replanting, document no. IOI/SOP/A/03 issue date 2007 revision March 2020. As per site visit that has been conducted, there is no extensive planting on marginal and fragile soil for each estates under IOI Pamol Kluang POM</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>IOI Research Centre conducted assessment and provided the estates with soil survey information (soil series map sighted available) and topography information. As per site visit, road and irrigation systems has been established accordingly as per best practices.</p>	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>Verified through records of soil series and soil topography confirmed that there is no peat soil in the supply bases within Pamol Kluang POM Certification Units. Verified there is no new planting activity in the estate visited.</p>	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>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).</p> <p>- Minor compliance -</p>	<p>Verified through records of soil series and soil topography confirmed that there is no peat soil in the supply bases within Pamol Kluang POM Certification Units. Verified there is no new planting activity in the estate visited.</p>	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>Verified through records of soil series and soil topography confirmed that there is no peat soil in the supply bases within Pamol Kluang</p>	Complied

		POM Certification Units. Verified there is no new planting activity in the estate visited.	
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	Verified through records of soil series and soil topography confirmed that there is no peat soil in the supply bases within Pamol Kluang POM Certification Units. Verified there is no new planting activity in the estate visited.	Complied
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>	Verified through records of soil series and soil topography confirmed that there is no peat soil in the supply bases within Pamol Kluang POM Certification Units. Verified there is no new planting activity in the estate visited.	Complied
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>	Verified through records of soil series and soil topography confirmed that there is no peat soil in the supply bases within Pamol Kluang POM Certification Units. Verified there is no new planting activity in the estate visited.	Complied
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</p>	Verified through records of soil series and soil topography confirmed that there is no peat soil in the supply bases within Pamol Kluang	Complied

	<p>on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>POM Certification Units. Verified there is no new planting activity in the estate visited.</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>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Both the Mill and Estate had established its Water Management Plan for year 2023 dated 10/11/2023 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as:</p> <ol style="list-style-type: none"> 1. Water conservation terraces 2. Contraction of drains along the planting area 3. Road, Drainage and culvert maintenance 4. Soil moisture conservation programme 5. Pruned fronds 6. Empty fruit bunch (EFB) Mulching 7. Moisture conservation of hill and rolling terrains plantings 8. Oil palm planting terraces 9. Monitoring of water quality 10. Water quality analysis for domestic uses <p>Verified through interview with workers and management, Pamol Kluang POM certification units does not restrict access to clean</p>	<p>Non-compliance</p>

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		<p>water or contribute to pollution of water used by communities. Workers has adequate of clean water.</p> <p>Water source for IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate and Pamol Timur Estate was from Syarikat Air Johor (SAJ) while for Mamor Estate and Swee Lam Estate was from treated water.</p> <p>Monitoring of Water Management Plan was not fully executed.</p> <p>During site visit at Mamor Estate, Buffer Zone Area Stream C at P00E (CMM1), it was observed that effect on chemical (drying grass and woody weed (Melastoma Malabathrium) at both sites of the stream indicate that weeding activity using chemicals has encroached beyond the buffer zone area). It was not in line with Natural water Stream Monitoring Plan stated on "Harvesting is allowed however, avoid spraying and manuring along the buffer zone".</p> <p>During site visit at Water Treatment Plan and verification of document at Swee Lam Estate, it was noted that consumption of water (Abstraction) was over the limit set in the Specific Environmental Permit: BAKAJ Licence (BAKAJ/334/300/05/01/07/02) valid until 31/12/2023. Details To date Meter as at 31/10/2023 = 58714 m3, Actual meter reading as at 28/11/2023 = 61675 m3, Average usage/day = 105 m3, Permitted abstraction / day = 60 m3. Thus, Minor NC was raised.</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</p>	<p>From the verification was done through site visit, interview and document review, it was confirmed that 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</p>	Complied

	<p>provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>2017). Monitoring was done by water sampling conducted by the certification units.</p> <p>Water sampling was conducted As per detailed in the Water Management Plan dated 10/11/2023.</p> <p>Mamor Estate</p> <ul style="list-style-type: none"> • River water analysis was conducted on 22/05/2023. Refer report with refence Mamor Estate 22nd Water Sampling. Sample taken for Upstream A, B and C. • Domestic water analysis was conducted on 20/09/2023. Refer report with reference number LS/W/M4917/23 by Latus Laboratory Services (M) Sdn Bhd. All results was within the Maximum permitted proportion. <p>Swee Lam Estate</p> <ul style="list-style-type: none"> • River water analysis was conducted on 02/06/2023. Refer report with refence Swee Lam Estate 22nd Water Sampling. Sample taken for Natural stream A and Stream B. • Domestic water analysis was conducted on 30/10/2023 and 03/11/2023. Refer report with reference number ENV/WATER/SWEELAM11.23 by ENV Consultancy & Monitoring Services Sdn Bhd. All results were within the Maximum permitted proportion. <p>IOI Organic Oil (M) Pamol Barat Estate</p> <ul style="list-style-type: none"> • River water analysis was conducted on 29/06/2023. Refer report with refence Analysis Of water Samples (Organic farming with reference number IOO/11/05/2023(C). Sample taken for Natural stream B. 	
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		<ul style="list-style-type: none"> • There is no domestic waster analysis conducted since the water source from SAJ. <p>IOI Organic Oil (M) Pamol Timur Estate</p> <ul style="list-style-type: none"> • River water analysis was conducted on 21/12/2023. Refer report with refence Pamol Timur Estate 21st Water Sampling. Sample taken for Natural stream B. • There is no domestic waster analysis conducted since the water source from SAJ. <p>Pamol Kluang POM</p> <ul style="list-style-type: none"> • River water analysis was conducted on 10/10/2023. Refer report with refence PAMOL/STREAM/OCT/2023. Sample taken for River Water. Report was submitted to DOE on monthly basis. • Effluent Pond water analysis was conducted on 10/10/2023. Refer report with reference number PAMOL/EFFLUENTPOND/OCT/2023 by ETOSH Consult & Engineering Plt. All results were within the Maximum permitted proportion. <p>Awareness signage has been placed at the strategic area for example main gate and buffer zone area. Training has been communicated with workers during muster call and affected stakeholders during stakeholder meeting.</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>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly reports were submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <table border="1" data-bbox="1137 1316 1926 1364"> <thead> <tr> <th>Report Date</th> <th>Quarter/Week</th> <th>BOD (Limit=100 mg/L)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Report Date	Quarter/Week	BOD (Limit=100 mg/L)				Complied
Report Date	Quarter/Week	BOD (Limit=100 mg/L)							

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		<table border="1"> <tr> <td rowspan="3">14/10/2023</td> <td>1stweek/1stmonth</td> <td>35.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>23.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>32.00</td> </tr> <tr> <td rowspan="3">04/07/2023</td> <td>1stweek/1stmonth</td> <td>35.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>20.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>23.00</td> </tr> <tr> <td rowspan="3">07/04/2023</td> <td>1stweek/1stmonth</td> <td>30.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>30.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>30.00</td> </tr> </table>	14/10/2023	1 st week/1 st month	35.00	5 th week/2 nd Month	23.00	9 th week/3 rd Month	32.00	04/07/2023	1 st week/1 st month	35.00	5 th week/2 nd Month	20.00	9 th week/3 rd Month	23.00	07/04/2023	1 st week/1 st month	30.00	5 th week/2 nd Month	30.00	9 th week/3 rd Month	30.00	<p>Pamol Kluang POM discharge POME through Furrow after treated as per "Jadual Pematuhan" No:004723. Signage on "Takat Pelepasan" was maintained at Mill has conducted water sampling at final discharge. Refer Report PAMOL/STREAM/OCT/2023 dated 10/10/2023.</p>	
14/10/2023	1 st week/1 st month	35.00																							
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Pamol Kluang POM for period July 2022 to June 2023 as per Water management Plan 2023. Average data as below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Water/FFB, m3/MT</th> </tr> </thead> <tbody> <tr> <td>Jul 2022</td> <td>1.37</td> </tr> <tr> <td>Aug 2022</td> <td>0.95</td> </tr> </tbody> </table>	Month	Water/FFB, m3/MT	Jul 2022	1.37	Aug 2022	0.95		Complied															
Month	Water/FFB, m3/MT																								
Jul 2022	1.37																								
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		Sept 2022	0.64	
		Oct 2022	0.81	
		Nov 2022	0.79	
		Dec 2022	0.92	
		Jan 2023	0.83	
		Feb 2023	1.06	
		Mar 2023	0.72	
		Apr 2023	0.61	
		May 2023	0.77	
		Jun 2023	0.81	
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised				
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	Refer Environmental Impact Assessment, Management Action Plan & Continuous Improvement Plan section Diesel and Petrol. The management plan was implemented and monitored by the management. Among the plan were: <ul style="list-style-type: none"> To maintain Biogas engine in good condition and ensure lessen usage of diesel during low FFB supply. To keep maintain the tractor and ensure tractor in good condition. To bund diesel tank >110% and raise it on a platform 		Complied

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- To build roofing for diesel tank to prevent rainwater from coming inside the bund
- Avoid purchasing second grade diesel from unauthorized dealers that contain high sulfur content.
- To provide soill kit and secondary containment for all transferring utensil at lubricant store
- Enforce all safety features for storage of lubricant and diesel effectively.

Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.

The monitoring was done monthly by management and Diesel used per FFB for the Year 2022/2023 (Period July – June) was recorded as below: -

Diesel data

Estate	Diesel	FFB	Diesel/FFB
Mamor Estate	88,954.00	49,533.97	7.82
Swee Lam estate	27,433.00	17,665.38	1.55

Mill	Diesel	CPO	Diesel/CPO
Pamol Kluang POM	55,685.00	56,686.43	0.98

Electricity data

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		<table border="1"> <tr> <th>Estate</th> <th>Electricity</th> <th>FFB</th> <th>KWh/FFB</th> </tr> <tr> <td>Mamor Estate</td> <td>255,416</td> <td>49,533.97</td> <td>22.48</td> </tr> <tr> <td>Swee Lam estate</td> <td>131,393</td> <td>17,665.38</td> <td>7.34</td> </tr> </table> <table border="1"> <tr> <th>Mill</th> <th>Electricity</th> <th>CPO</th> <th>Electricity/CPO</th> </tr> <tr> <td>Pamol Kluang POM</td> <td>927,148.00</td> <td>56,686.43</td> <td>16.35</td> </tr> </table> <p>Fiber and Shell were used as the source for burning for boiler. Record production was tabulated in the table below:</p> <table border="1"> <tr> <th>Mill</th> <th>Fiber, MT</th> <th>Shell, MT</th> <th>CPO</th> <th>Fiber & Shell / CPO</th> </tr> <tr> <td>Pamol Kluang POM</td> <td>24,496.93</td> <td>14,475.46</td> <td>45,152.84</td> <td>0.86</td> </tr> </table>	Estate	Electricity	FFB	KWh/FFB	Mamor Estate	255,416	49,533.97	22.48	Swee Lam estate	131,393	17,665.38	7.34	Mill	Electricity	CPO	Electricity/CPO	Pamol Kluang POM	927,148.00	56,686.43	16.35	Mill	Fiber, MT	Shell, MT	CPO	Fiber & Shell / CPO	Pamol Kluang POM	24,496.93	14,475.46	45,152.84	0.86	
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<p>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.</p>																																	
7.10.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Both the mill and the estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. The management from both estate and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment.</p>	Complied																														

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		<p>Fuel Consumption, POME and reported in the Palm GHG Summary Report. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue • Stock requisition note Mill • Mill Month End Production Report • Monthly production report • Flowmeter & running hours record book <p>Effluent analysis report Based on the verification of records; all the sampled issuance was traceable</p>			
7.10.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since no new development by the certification unit</p>	<p>Not Applicable</p>		
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for Environmental Impact Assessment Plan FY 2023/2024 dated 12/11/2023 were:</p> <table border="1" data-bbox="1137 1310 1930 1353"> <tr> <td data-bbox="1137 1310 1532 1353">Environmental issue</td> <td data-bbox="1532 1310 1930 1353">Action Plan</td> </tr> </table>	Environmental issue	Action Plan	<p>Complied</p>
Environmental issue	Action Plan				

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		Spillage from machinery servicing activities	Containment trap (Oil Trap)		
		Leakages from damaged diesel tanks and petrol storage container	To place rags at diesel storage area. The drip trays are used to contain the diesel if there is any leak		
		Hazardous effect of spillage into drains, watercourse and land.	Sumps to be installed in store room in case of accidental spillage		
		The use of chemical contributing to overall GHG emission	Accurate dosage to be used and monitored. The chemical rates are put up at the pre mixing area so that the workers can determine the quantity of chemicals to be used accurately		
		<p>Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports (Isokinetic Stack & Air Emission Monitoring Report):</p> <p><u>Boiler No. 2</u></p> <ul style="list-style-type: none"> • Report no.: ETOSH/PAMOL/ISO/22/2023 • Report date: 25/10/2023 • Result: Dust: 116.00 mg/m³ (B5) vs limit 150, CO: 150.90 mg/m³ vs limit 1000 @ 12% CO₂ 			

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		<p><u>Boiler No. 1</u></p> <ul style="list-style-type: none"> • Report no.: ETOSH/PAMOL/ISO/178/2023 • Report date: 11/08/2023 • Result: Dust: 124.00 mg/m³ (B5) vs limit 150, CO: 123.50 mg/m³ vs limit 1000 @ 12% CO₂ <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan JAS.JHQ.600-3/X/XX Licence No: 004723.</p> <p>Environmental audit by 3rd party has been conducted annually by Assessor with reference number EA0112/CESSWI 3766 dated 23/11/2023.</p> <p>Latest DOE visit was sighted on 21/06/2023. Sighted reports details and the response by the management for issue that has been raised.</p>	
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>At Pamol Kluang POM supply bases, there has been no new planting activity; only the replanting of existing oil palm has been undertaken. This aligns with the Zero Burning Policy, as outlined in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' from 2003. The policy adheres to the EQA 1974, specifically focusing on section 29A (prohibition on Open Burning) and 29AA</p>	Complied

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		<p>(Exclusion from 'Open Burning'). These guidelines were officially endorsed by the Plantation Director in May 2018.</p> <p>The dissemination of this policy has been thorough, communicated to all employees through training sessions, briefings, and signage posted on various notice boards across the estate. Further reference can be made to the Group Standard Operating Procedure (StOP) for Land Clearing, index 4.1, and the Group Standard Operating Procedure (StOP) for Land Preparation for New Planting and Replanting, index 4.2, both established in September 2007. It is important to note that any felled palms are processed by shredding or chipping and then strategically piled between planting rows.</p>	
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 employs various systems to prevent fire outbreaks in its estates. The headquarters utilizes the Fire Alert Information System and Rapid Response Plan Ver. 1.0. This alert system sources information from NASA Firms Global Fire Alerts and is monitored by the Sustainability Department. In the event of a triggered hot spot, the Sustainability Department sends an email to the relevant estate or operational unit for on-site verification.</p> <p>Each estate is equipped with an Emergency Response Team (ERT) that takes prompt action in the event of a fire outbreak. The ERT received training on August 2023, to enhance their preparedness and response capabilities.</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>As per verification on engagement from sampled estates to the adjacent stakeholder on fire prevention and control measure. The communication has been given during Stakeholder Meeting dated 11/10/2023. Refer Slide section Fire Prevention and Control Measures by IOI Plantations.</p>	Complied

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.			
7.12.1	<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>There are no land clearing since November 2005 in Pamol Kluang POM and supply base.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>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>High Conservation Value (HCV) & Conservation Area Assessment was conducted by the IOI Group HQ and documented in a report titled High Conservation Value (HCV) & Conservation Area Assessment and Management Action Plans (Review Document). The exercise has taken into consideration all aspects of environmentally sensitive areas such as rivers, streams, ponds, wildlife boundaries and was documented in the report. The reports state the HCV Identification, methods of managing and monitoring the identified.</p> <p>There is an adjustment of HCV area compared to previous report resulting reduction from 70.11 ha to 60.83 Ha. There is no removal of HCV area. There previous reporting was included of HCV with conservation area. As per HCV and Conservation Area Assessment dated November 2023, 9.28 ha of conservation area (Unplanted area) which move to infrastructure and others.</p> <p>Verified the reports and the HCVs and biodiversity's available as below.</p> <p>Mamor Estate: Review HCV and Conservation Area Assessment and Management Action plan dated 10/11/2023.</p>	Complied

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Estate	Type of HCV	Hectarage, Ha
Mamor Estate	HCV4 (Natural water Stream)	8.70
	HCV4 (Steep)	35.44
Swee Lam Estate: Review HCV and Conservation Area Assessment and Management Action plan dated 27/11/2023.		
Estate	Type of HCV	Hectarage, Ha
Swee Lam Estate	HCV 4: (Natural water Stream)	1.87
IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate: Review HCV and Conservation Area Assessment and Management Action plan dated 10/11/2023.		
Estate	Type of HCV	Hectarage, Ha
IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate	HCV 4: (Natural water Stream)	1.14
IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate: Review HCV and Conservation Area Assessment and Management Action plan dated 10/11/2023.		
Estate	Type of HCV	Hectarage, Ha

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		IOI Organic Oil (M) Sdn Bhd Pamol Timur Estate	HCV4 (Natural water Stream)	0.07									
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	N/A			Not Applicable								
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>High Conservation Value (HCV) & Conservation Area Assessment was conducted by the IOI Group HQ and documented in a report titled High Conservation Value (HCV) & Conservation Area Assessment and Management Action Plans (Review Document). The exercise has taken into consideration all aspects of environmentally sensitive areas such as rivers, streams, ponds, wildlife boundaries and was documented in the report. The reports state the HCV Identification, methods of managing and monitoring the identified. Verified the reports and the HCVs and biodiversity's available as in indicator 7.12.2. Among the management plan that has been established include plan was:</p> <ol style="list-style-type: none"> Harvesting is allowed however, avoid spraying and manuring along the buffer zone. Training for sprayers and manurers on buffer zone maintenance Distance of buffer zone to maintained as per requirement by department of Irrigation and Drainage (DID) <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">River Width (m)</th> <th style="width: 50%;">River Reserve (Peninsular Malaysia)</th> </tr> </thead> <tbody> <tr> <td>>40</td> <td>50</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> </tbody> </table>			River Width (m)	River Reserve (Peninsular Malaysia)	>40	50	20-40	40	10-20	20	Complied
River Width (m)	River Reserve (Peninsular Malaysia)												
>40	50												
20-40	40												
10-20	20												

		<table border="1" data-bbox="1189 363 1899 480"> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td><5</td> <td>5</td> </tr> </table> <p>3. Buffer zone to be marked according to IOI Buffer zone maintenance Guidelines.</p> <p>4. To maintain the soft vegetation along the buffer zones.</p> <p>5. Fronds can be stacked in parallel along the stream to retain soil from runoff.</p> <p>6. Pollution from solid wastes from linesite is reduced by constructing a silt trap at the outlet drainage before it flows out to the connecting tributary.</p> <p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all the buffer zones and signage was well maintained. Records of HCV and Biodiversity Awareness Trainings were available for verification.</p> <p>As per verification by the auditor, it has been confirmed that monitoring and management plan has been established is effectively implemented. There is no incompliance with the management plan and the management decided to maintain current management plan as practices.</p>	5-10	10	<5	5	
5-10	10						
<5	5						
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.	According to the internal HCV assessment conducted in 2023, no local communities have been identified within the High Conservation Value (HCV) area under the Pamol POM certification unit.	Complied				

	- Minor compliance -		
7.12.6	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no RTE species have been identified in the Pamol Kluang POM Certification units. According to the RTE assessment conducted in November 2023, only wildlife classified as protected, totally protected, and protected for aboriginal consumption were observed within the estate. These include species such as monitor lizards, wild boars, king cobras, and red jungle fowl, among others. A regular program is in place to educate the workforce about the status of RTE species. Training sessions on RTE, buffer zone protocols, and related topics have been provided to the workforce. These sessions emphasize disciplinary measures that will be taken if any individual working for the company is found to capture, harm, collect, trade, possess, or kill these RTE species. Training has been conducted as below:</p> <p>Mamor Estate: 20/04/2023</p> <p>Swee lam Estate: 20/04/2023</p> <p>IOI Organic oil (M) Sdn Bhd Pamol Timur Estate:</p> <p>IOI Organic Oil (M) Sdn Bhd Pamol Barat Estate:</p>	Complied
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>There has been no new planting or land clearing since November 15, 2018. The monitoring of the conservation area, including conservation zones, riparian areas, and forest buffers, has been conducted on a weekly basis. The checklist and monitoring records for conservation areas, forest buffers, and buffer zones for the year 2023 are accessible for verification. Refer latest Monitoring record on November 2023 at sample estates.</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 Pamol POM certification unit.</p>	<p>Complied</p>
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022 for PAMOL Kluang POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022 for PAMOL Kluang POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.38
PKO	0.00

Extraction	%
OER	22.23
KER	4.65

Production	t/yr
FFB Process	203,133.74
CPO Produced	45,152.84
PKO Produced	9,455.25

Land Use	Ha
OP Planted Area	10,830.00
OP Planted on peat	0.00
Conservation (forested)	35.56
Conservation (non-forested)	27.60
Total	10,893.16

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	86,361.24	0.43	0.00	0.00	0.00	0.00	86,361.24	0.43
CO ₂ Emission from fertilizer	8,315.95	0.04	0.00	0.00	0.00	0.00	8,315.95	0.04
NO ₂ Emission	4,750.31	0.02	0.00	0.00	0.00	0.00	4,750.31	0.02
Fuel Consumption	993.24	0.00	0.00	0.00	0.00	0.00	993.24	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-81,695.59	-0.40	0.00	0.00	0.00	0.00	-81,695.59	-0.40
Conservation Sequestration	-326.09	-0.00	0.00	0.00	0.00	0.00	-326.09	-0.00
Total	18,399.07	0.09	0.00	0.00	0.00	0.00	18,399.07	0.09

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	111,422.09	0.55
Fuel Consumption	308.46	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	111,730.55	0.55

Summary of Kernel Crusher Emission and Credit (if applicable)

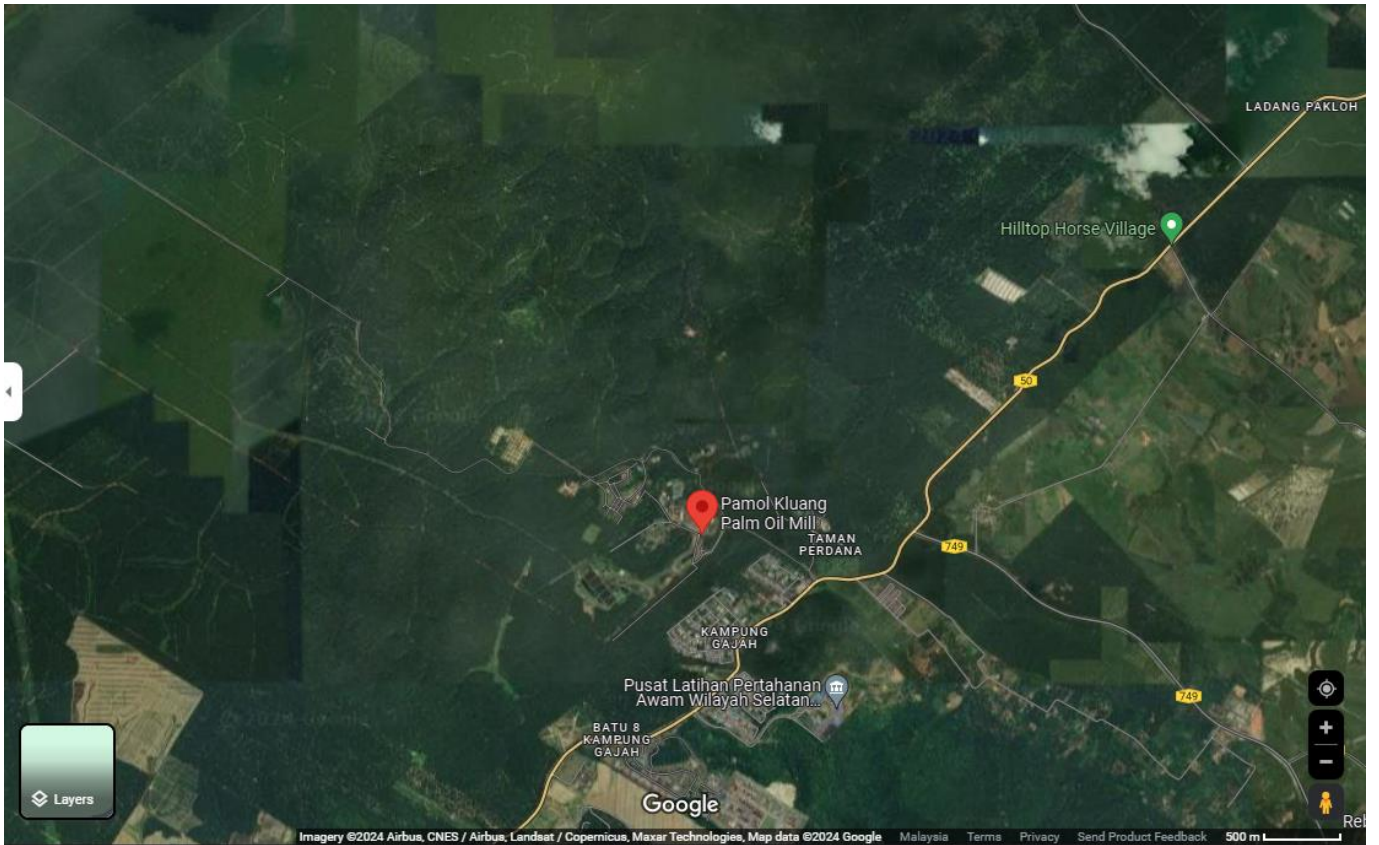
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100.00

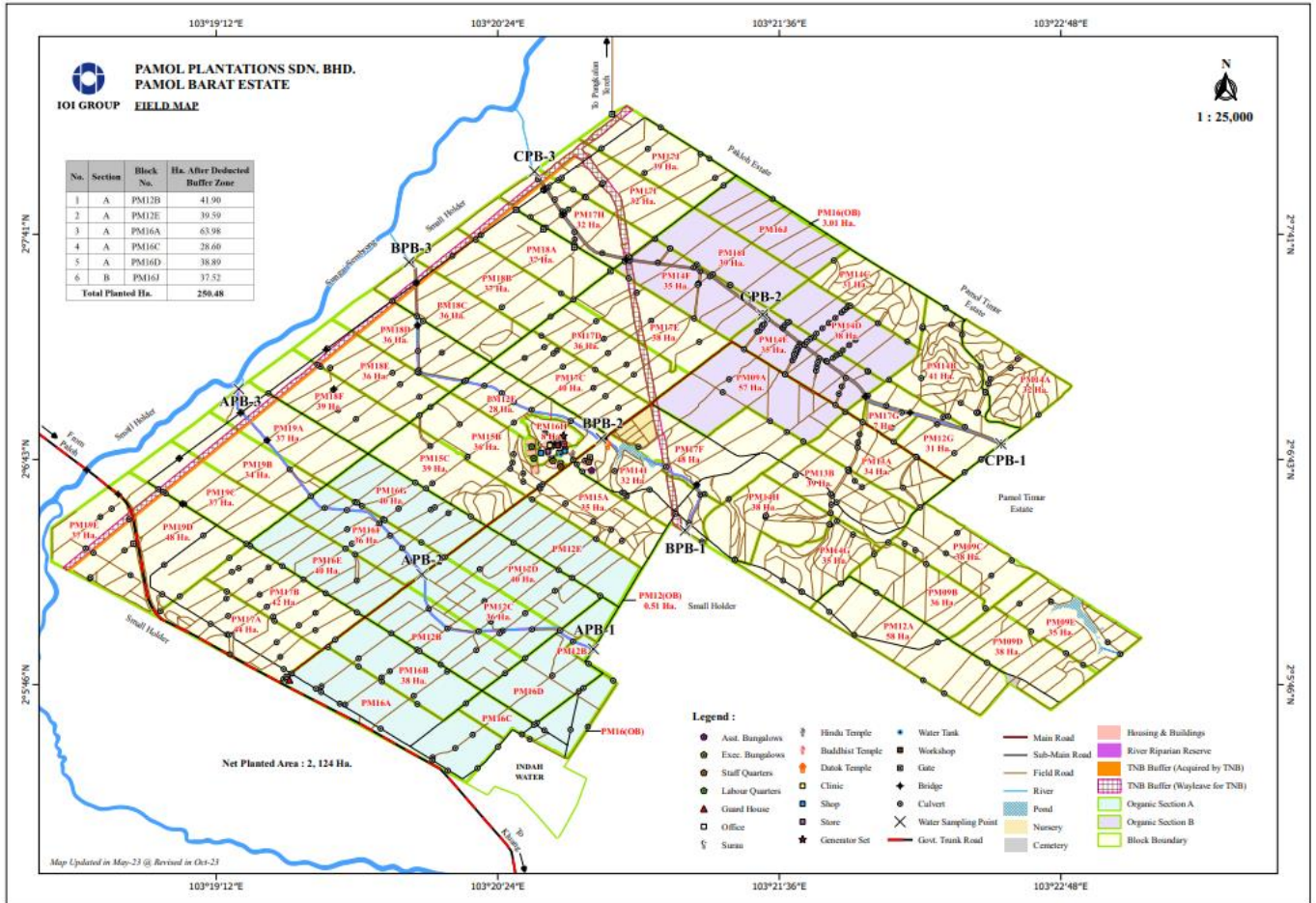
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix C: Location Map of Certification Unit and Supply bases

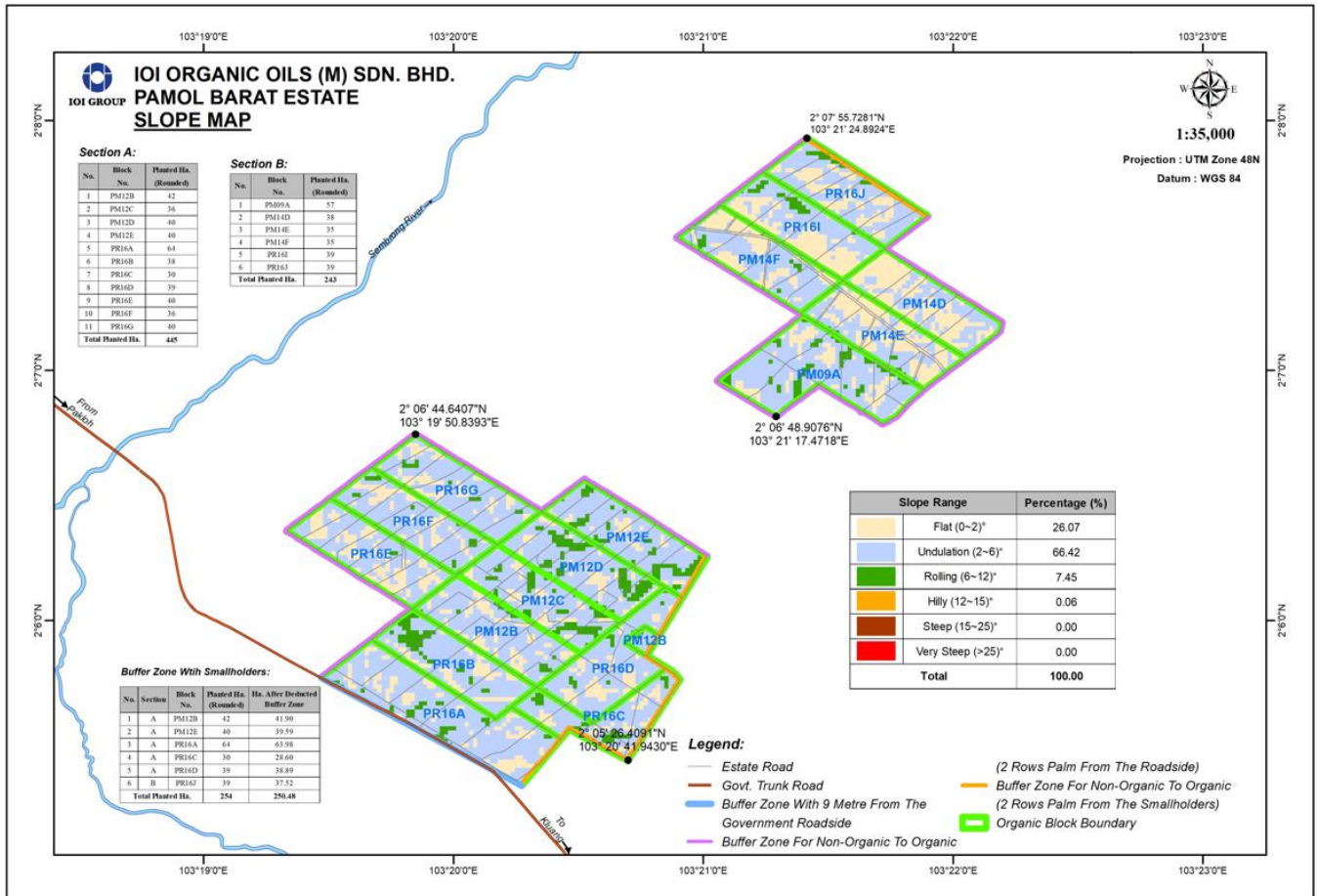


Appendix D: Estate Field Map

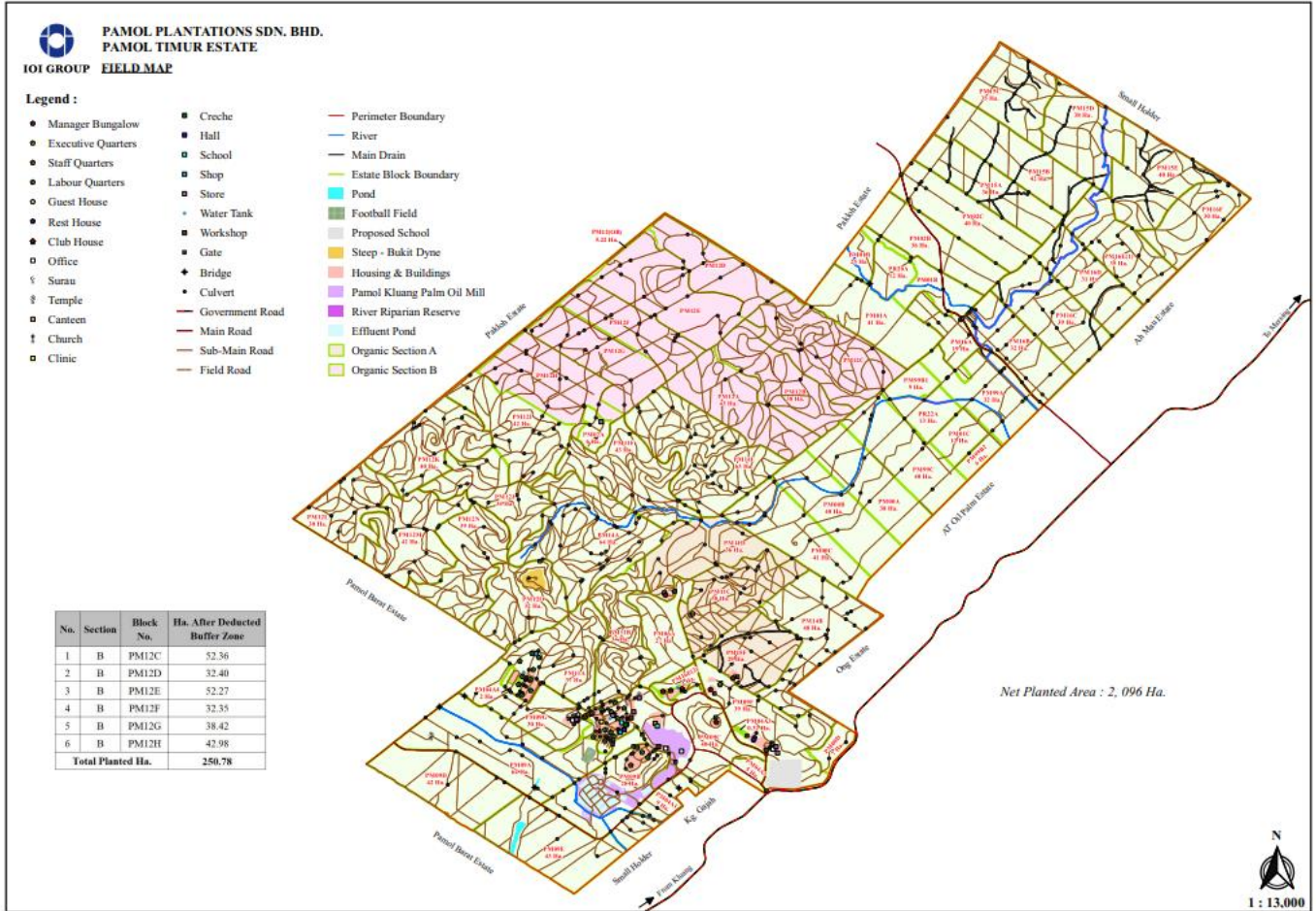
Pamol Barat Estate



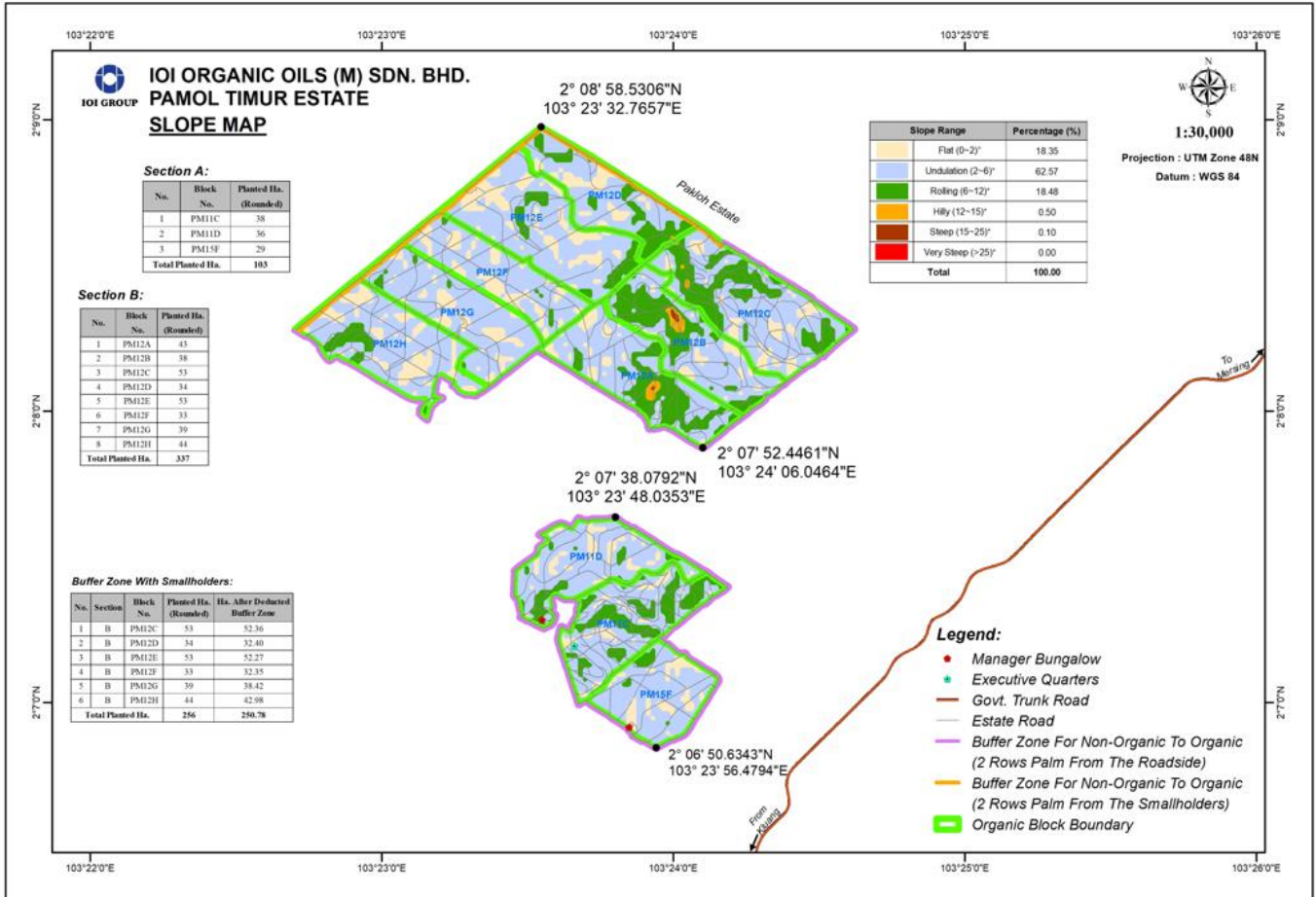
IOI Organic Oils (M) Sdn Bhd Pamol Barat Estate



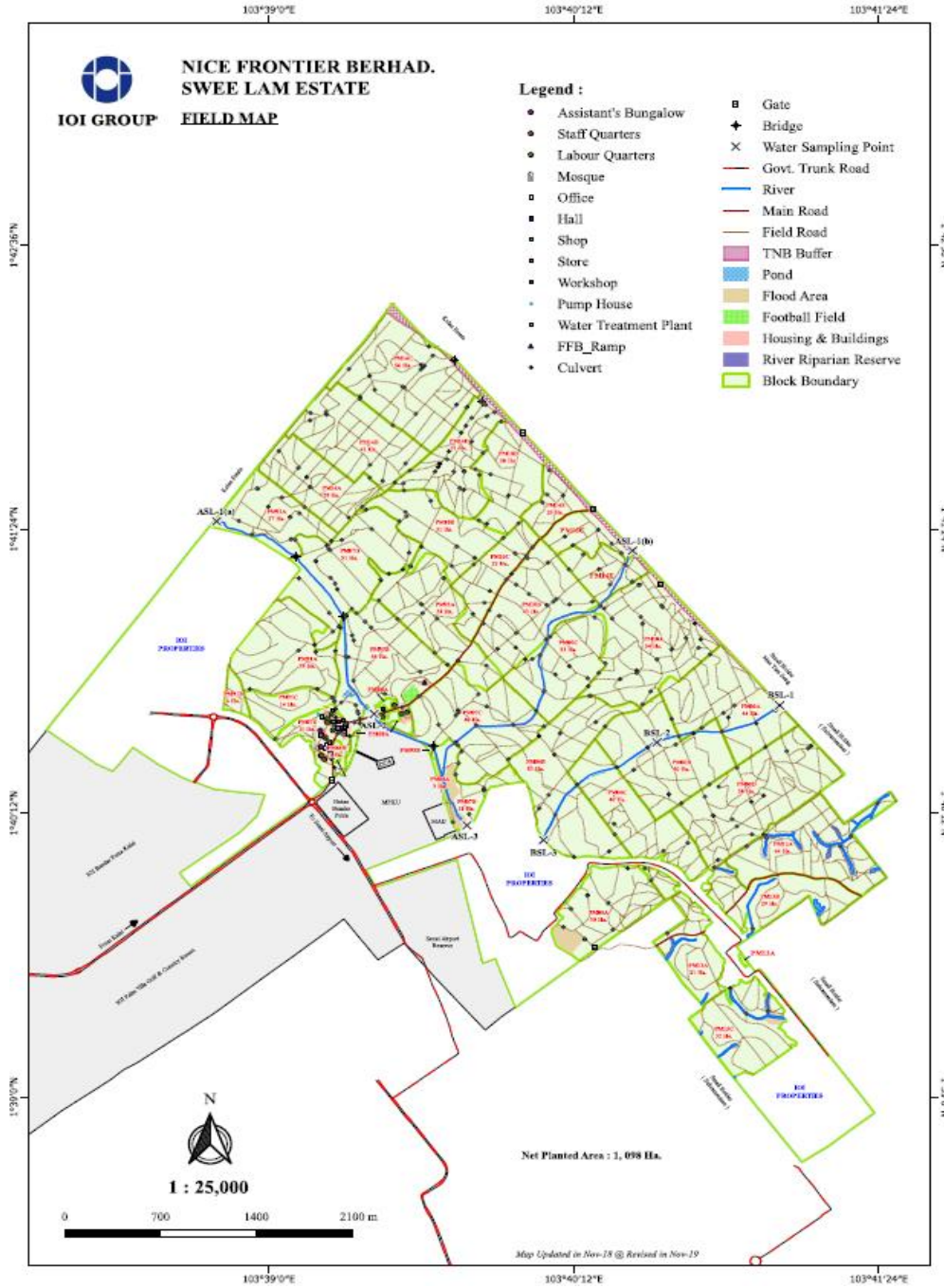
Pamol Timur Estate



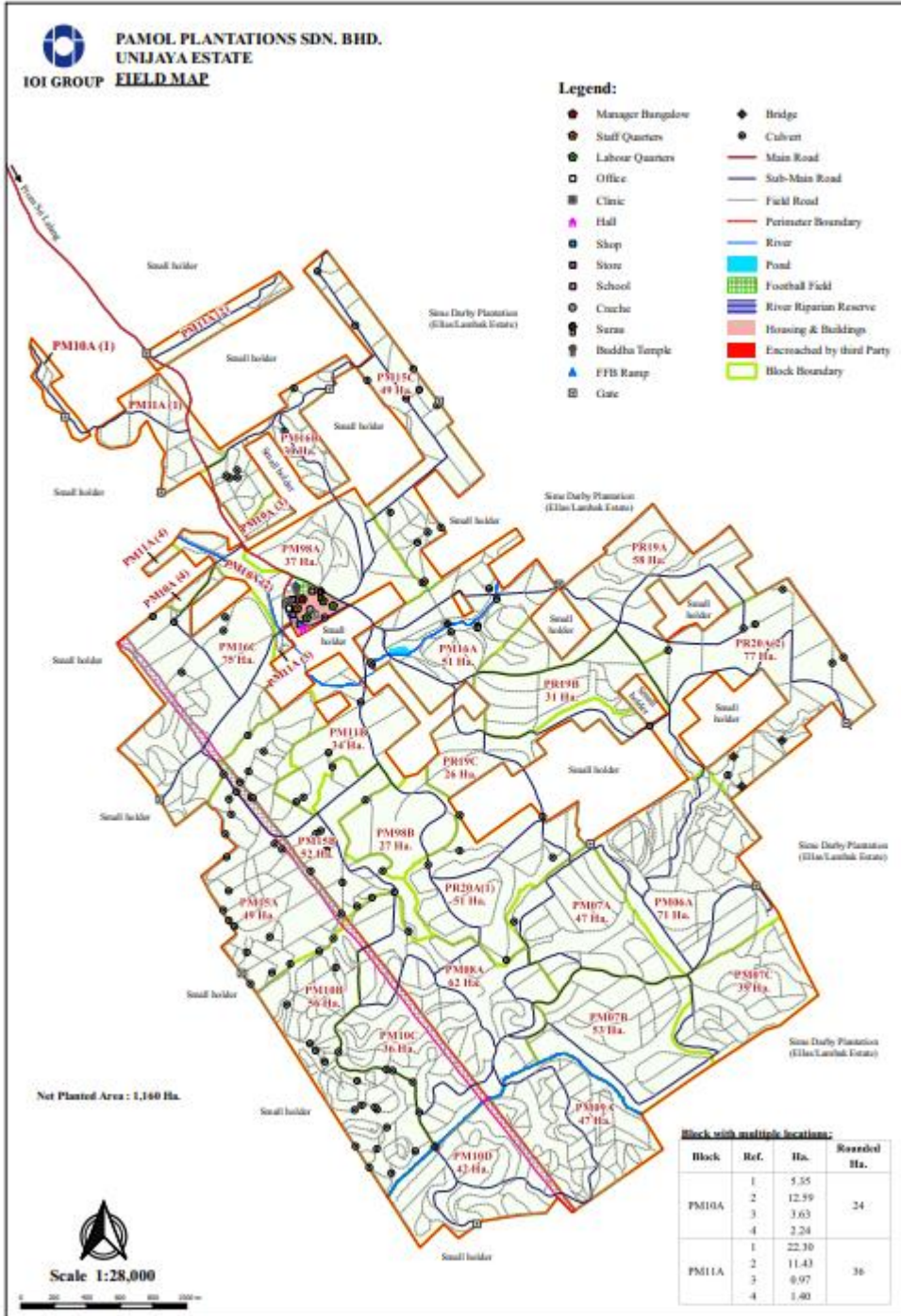
IOI Organic Oils (M) Sdn Bhd Pamol Timur Estate



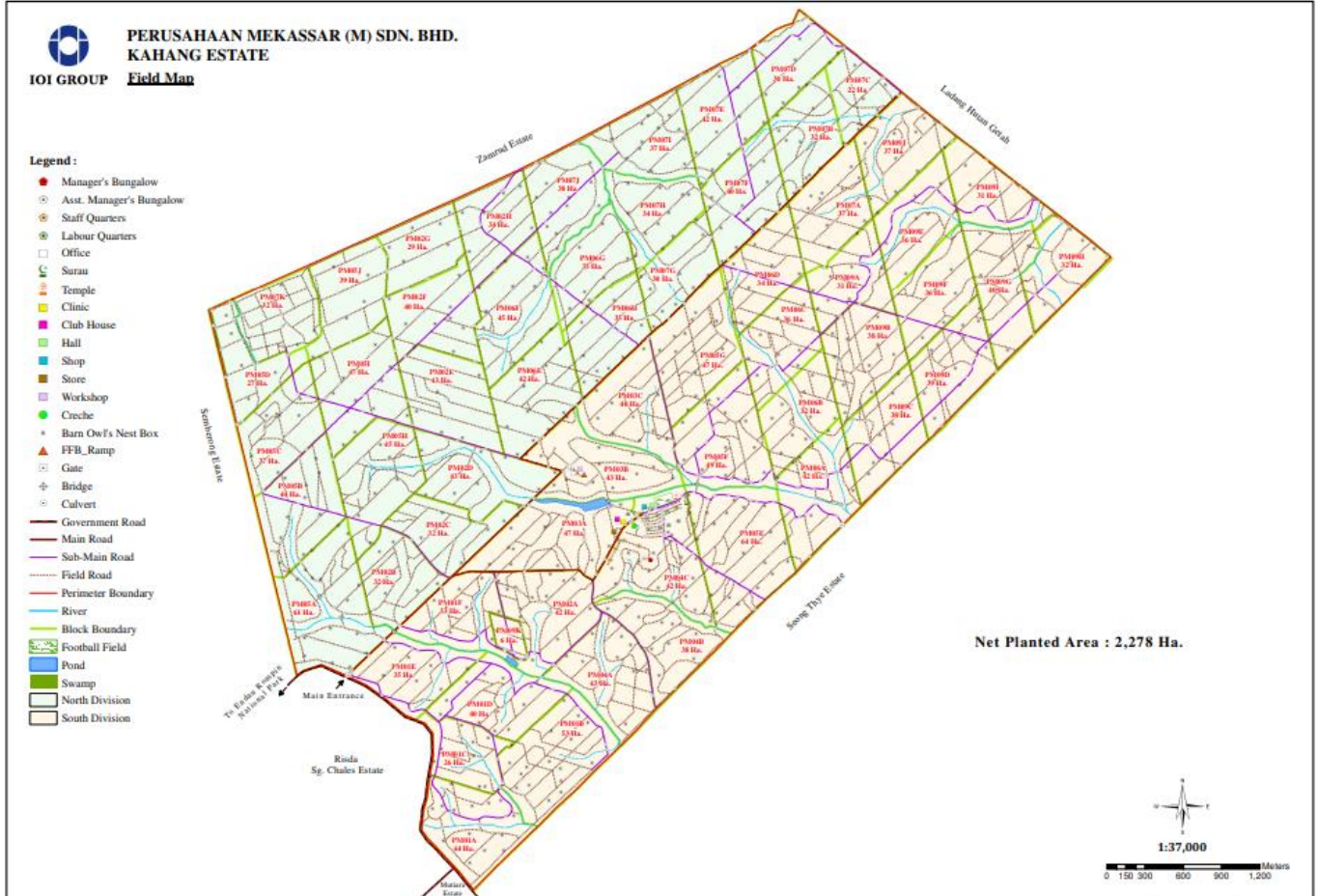
Swee Lam Estate



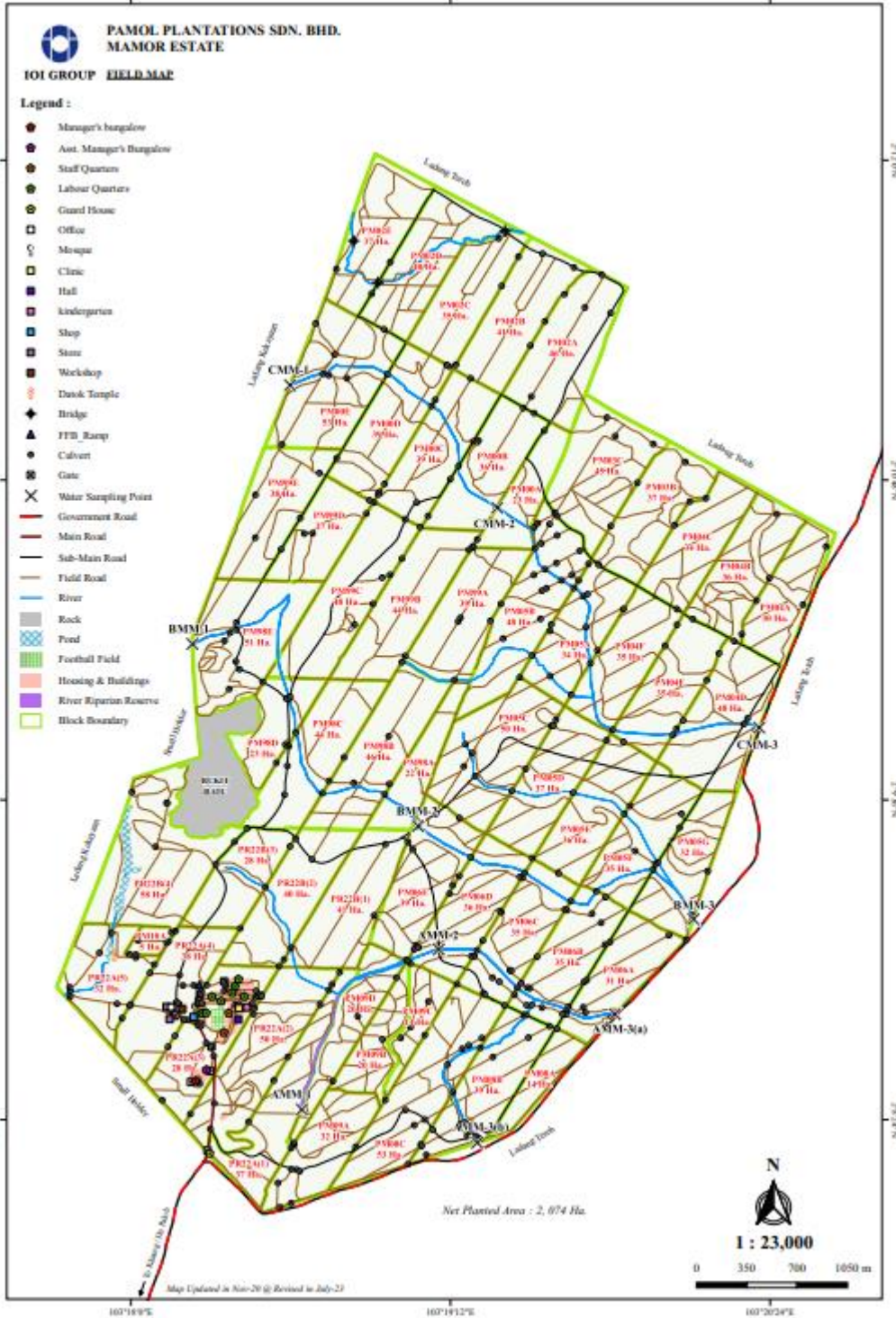
Unijaya Estate



Kahang Estate



Mamor Estate



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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied			
Number of samples			
Remarks			

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
Total									

Appendix F: 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
ISS	Independent Smallholder Standard
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