

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

□ Initial Assessment
☑ Annual Surveillance Assessment (3_1)
☐ Recertification Assessment (Choose an item.)
☐ Extension of Scope

Client Company Name / Parent Company: SD GUTHRIE BERHAD

Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia

Certification Unit:

New Britain Palm Oil Limited - Mosa POM

Location of Certification Unit:
3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province,
Papua New Guinea

Date of Final Report: 10/12/2024



TABL	E of CONTEN	NTS	Page No
	Section 1: S	Scope of the Assessment	3
	1.	Company Details	3
	2.	Certification Information	3
	3.	Other Certifications	4
	4.	Location(s) of Mill & Supply Bases	4
	5.	Description of Supply Base	4
	6.	Plantings & Cycle	5
	7.	Summary of Certified Tonnage of FFB (Own Certified Scope)	5
	8.	Summary of Certified Tonnage of FFB (from other certified unit(s))	6
	9.	Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from cert	ificate)6
	10.	Summary of Certified Tonnage (not applicable for ISS)	7
	11.	Summary of Actual Volume sold	8
	12.	Independent Smallholders Certified Tonnage / Volume	9
	13.	Independent Smallholders Actual Sold Tonnage / Volume	9
	Section 2: A	ssessment Process	11
	2.1	Assessment Methodology, Programme, Site Visits	11
	2.2	BSI Assessment Team	12
	2.3	Assessment Plan	14
	Section 3: A	ssessment Findings	17
	3.1	Multiple Management Units and Time Bound Plan	17
	3.2	Progress of scheme smallholders and/or outgrowers	24
	3.3	Details of Nonconformities	44
	3.3.1	Status of Nonconformities Previously Identified and Observations	
	3.3.2	Summary of the Nonconformities and Status	76
	3.4	Stakeholders and previous land owner / user consultation	77
	3.5	Impartiality and conflict of interest	79
	Formal Sign	ing-off of Assessment Conclusion and Recommendation	79
	Appendix A:	Summary of Findings	80
	Appendix B:	GHG Reporting Executive Summary	175
	Appendix C:	Location Map of Certification Unit and Supply bases	177
	Appendix D:	: Estate Field Map	179
		List of Smallholder Registered and/or sampled	
	• •	List of Abbreviations	



Section 1: Scope of the Assessment

1. Company Details					
Parent Company	SD Guthrie Berhad				
RSPO Membership Number	1-0008-04-000-00	Membership	Approval Date	06/09/2004	
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia				
Palm Oil Mill / Group Manager / Estate (Certification Unit)	New Britain Palm Oil Limited – West New Britain				
Location / Address	3.5KM Bebere Road, Bebere I Guinea	Plantation, Mos	sa, New Britain Prov	vince, Papua New	
Website	www.sdguthrie.com				
Management Representative	Benjamin Osa E-mail benjamin.osa@sdguthrie.com				
Telephone	+675 71439078	Facsimile	+675 9852003		

2. Certification Information					
Certificate Number	RSPO 728122	Certificat	te Start Date	1	10/09/2008
Date of First Certification	10/09/2008	Certificat	e Expiry Date	(09/09/2028
Scope of Certification	Production of Sustainable Cru	de Palm Oi	(CPO) and Palm K	erne	el (PK)
Visit Objectives	 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	 □ Pre Assessment (Choose an item.) □ Initial Assessment ⋈ Annual Surveillance Assessment (ASA 3_1) □ Recertification Assessment (Choose an item.) □ Scope Extension 				
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 PNG & Solomon Islands National Interpretation 2019 of the RSPO P&C 2018				
Supply Chain Module	☐ Identity Preserved; ☐ Mass Balance				
ISH certification Phase	□ Eligibility □ Milestone A □ Milestone B ⋈ Not Applicable				
Is this a remote audit or on-site audit	□ On-site audit (Option AI)	□ On-site	audit (Option AII)		Remote audit (Option B)



3. Other Certifications					
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date		
C543037	MS1480:2019	DNV	17/10/2025		
C543019	MS1480:2019	DNV	30/10/2025		
C543026	MS1480:2019	DNV	01/11/2025		
C503033	MS1480:2019	DNV	01/11/2025		
C543041	MS1480:2019	DNV	01/11/2025		
C543029	MS1480:2019	DNV	30/10/2025		
C543009	MS1480:2019	DNV	18/10/2025		
C859480GMP-01.2021	GMP + Feed Safety Assurance	Control Union Certified	19/08/2024		
C861486GMP-01.2021	GMP + Feed Safety Assurance	Control Union Certified	19/08/2024		

4. Location(s) of Mill & Supply Bases						
Name	Location	GPS Co	ordinates			
(Mill / Supply Base / Group Manager / Smallholders)		Latitude	Longitude			
Mosa Oil Mill (60mt/hr)	Bebere Plantation, Mosa, West New Britain, Papua New Guinea	5° 37′ 20.93″S	150° 14′ 13.74″E			
Nahavio Division	Mosa, West New Britain, Papua New Guinea	5° 35' 38.83"S	150° 13' 35.18"E			
Kavui Division	Mosa, West New Britain, Papua New Guinea	5° 35' 37.32"S	150° 18' 39.24"E			
Siki Division	Hoskins, West New Britain, Papua New Guinea	5° 28' 08.44"S	150° 27' 08.92"E			
Buvussi Division	Malalimi, West New Britain, Papua New Guinea	5° 37' 42.96"S	150° 22' 46.02"E			
Community Planting	West New Britain, Papua New Guinea	5° 30' 19.01"S	150° 32' 08.37"E			
Independent Farms (more than 50 ha)	West New Britain, Papua New Guinea	5° 39' 03.38"S	150° 01' 22.43"E			

5. Description of Supply Base						
New Planting Development	⊠ No			□ Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)		rastructure & Other (ha)	Total Area (ha)	% of Planted
Nahavio Division (26 SH)	4,035.30	224.14		749.09	5,008.53	80.57
Kavui Division (26 SH)	5,332.85	25.64		398.08	5,756.57	92.64



Total	19,585.29	255.46	3,058.27	22,899.02	490.92
Community Planting (1 Farm)	529.40	2.67	623.58	1,155.65	45.81
Independent Farms (more than 50 ha) (3 SH)	675.00	0.36	25.01	700.37	96.38
Buvussi Division (8 SH)	4,446.36	0.81	506.36	4,953.53	89.76
Siki Division (28 SH)	4,566.38	1.84	756.15	5,324.37	85.76

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Nahavio Division	86.00	778.00	2,177.30	994.00	3,949.30	86.00
Kavui Division	86.00	602.00	3,241.85	1,403.00	5,246.85	86.00
Siki Division	140.00	430.00	2,785.38	1,211.00	4,426.38	140.00
Buvussi Division	65.00	508.00	2,409.00	1,464.36	4,381.36	65.00
Independent Farms (more than 50 ha)	26.00	279.00	355.00	15.00	649.00	26.00
Community Planting	-	228.40	175.00	126.00	529.40	-
Total (ha)	403.00	2825.4	11,143.53	5213.36	19,182.29	403.00

7. Summary of Certified Tonnage of FFB (Own Certified Scope)						
Estate /	Tonnage (MT) / year					
Smallholders	Estimated last year (Sept 2023 – Aug	Actual (Aug'23-July'24)		Forecast (Sept 2024 – Aug		
	2024)	Previous license period (Aug 2023)	Current license period (Sept 2023 – July 2024)	2025)		
Nahavio Division	57,380.44	3,384.43	32,080.17	57,380.44		
Kavui Division	84,312.61	4,972.95	47,137.36	82,235.60		
Siki Division	63,447.06	3,742.25	35,471.88	51,357.22		
Buvussi Division	63,561.70	3,749.02	35,535.97	63,561.70		
Community Planting	21,342.37	1,258.82	11,932.06	4086.64		
Independent Farms (more than 50 ha)	14,967.67	882.83	8,368.10	21,342.37		
Total	305,011.85	188,5	15.84	279,963.97		

Note: since the smallholders fertilizers application is based on their decision. The of SH has conducted training and communication on the need to apply fertilizers. Other than that, nearly 30% is more than 25 years



8. Summary of Certi	8. Summary of Certified Tonnage of FFB (from other certified unit(s))					
Estate /		Tonnage (MT) / year				
Smallholders	Estimated last year (Sept 2023 – Aug		tual -July'24)	Forecast (Sept 2024 – Aug		
	2024)	Previous license period (Aug 2023)	Current license period (Sept 2023 – July 2024)	2025)		
Bebere Estate		1,156.060	20808.200			
Kumbango Estate		305.3	11379.400			
Togulo Estate		499.92	10638.830			
Dami Estate		335.86	6068.320			
Kautu Estate		0	561.222			
Karausu Estate		0	462.640			
Bilomi Estate		0	627.480			
Malilimi Estate		851.84	19179.010			
Numundo Estate		13.24	195.550			
Haella Estate		17.16	167.220			
Garu Estate		0	22.720			
Navarai Estate		0	57.020			
Daliavu Estate		4.66	40.490			
Sapuri Estate		0	124.990			
Tamare Estate		20.06	619.480			
Lolokoru Mini Estate		20.32	366.370			
Moroa Estate		0	59.780			
Valupai/Natupi Estate		53.14	101.440			
Rigula Mini Estate		1141.5	15091.820			
Ove Estate		89.44	690.280			
Total		91,77	70.76			

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)						
Out growers / Tonnage (MT) / year						
smallholders	Estimated last year (Sept 2023 – Aug	Actual (Aug'23-July'24)				Forecast (Sept 2024 – Aug
	2024)	Previous license period (Aug 2023)	Current license period (Sept 2023 – July 2024)	2025)		
N/A	N/A	N/A N/A		N/A		
Total	N/A	N,	/A	N/A		



9A. I	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	Aug 2023	22,498.800	0	22,498.800					
2	Sept 2023	20,460.040	0	20,460.040					
3	Oct 2023	28,578.308	0	28,578.308					
4	Nov 2023	25,168.647	0	25,168.647					
5	Dec 2023	23,945.869	0	23,945.869					
6	Jan 2024	25,281.046	0	25,281.046					
7	Feb 2024	21,763.803	0	21,763.803					
8	Mar 2024	18,413.527	0	18,413.527					
9	Apr 2024	23,587.562	0	23,587.562					
10	May 2024	24,376.520	0	24,376.520					
11	June 2024	25,404.357	0	25,404.357					
12	July 2024	20,808.124	0	20,808.124					
	TOTAL	280,286.60	0.00	280,286.60					

10. Summary of Certified Tonnage (MT) (not applicable for ISS)							
Estimated last year (Sept 2023 – Aug 2024)	Actual (Aug'23-July'24)						
	Previous license period (Aug 2023)		Current license period (Sept 2023 – July 2024)				
FFB		F	FFB				
289,094.00 mt	22,498.80	22,498.80 mt 25,7787.80 mt		270 062 07 mt			
	TOTAL		280,286.60 mt	279,963.97 mt			
CPO (OER: 22.43%)		CPO (OER	: 21.29 %)	CPO (OER: 21.16 %)			
64,831.00 mt	4,662.57	mt	55,038.47 mt	59,257.20 mt			
	Total		59,701.04 mt				
PK (KER: 5.95%)	PK (KER: 6.06 %)		PK (KER: 5.79 %)				
17,202.00 mt	1,363.02 mt		15,628.33 mt	16,218.27 mt			
	Total		16,991.35 mt				

10A.	10A. Monthly Records of Certified CPO & PK since the last audit							
No.	No. Month - Year Certified CPO (MT) Certified PK (MT)							
1	Aug-23	4662.574	1,363.02					
2	Sep-23	4,249.60	1,179.28					



	TOTAL	59,701.04	16,991.35
12	Jul-24	4,377.13	1,236.40
11	Jun-24	5,538.39	1,532.95
10	May-24	5,250.15	1,441.66
9	Apr-24	4,972.14	1,276.57
8	Mar-24	3,921.14	1,200.52
7	Feb-24	4,381.04	1,658.49
6	Jan-24	5,433.58	1,599.20
5	Dec-23	5,252.74	1,497.14
4	Nov-23	5,583.96	1,514.30
3	Oct-23	6,078.60	1,491.82

11. Summary of Actual Volume sold

Current License period (Sept'23- July-24)

	RSPO Certified	Other Schen	nes Certified	Conventional	Tatal					
	KSFO Certified	ISCC	Others	Conventional	Total					
CPO (MT)	30,278.44	1	-	-	30,278.44					
PK (MT)	10,154.51	-	-	-	10,154.51					
Credits	-	-	-	-	-					
Previous Lic	Previous License period (August'23)									
CPO (MT)	9,024.92	-	-	-	9,024.92					
PK (MT)	-	-	-	-	-					
Credits	-	-	-	-	-					

11A. Re	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	Non-disclosure 1	Various Numbers consolidated	9,024.92	-					
2	Non-disclosure 2	Various Numbers consolidated	30,278.44						
3	Non-disclosure 3	Various Numbers consolidated	-	10,154.51					
		TOTAL	39,303.36	10,154.51					

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)
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
		TOTAL		

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

11D. Re	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					
N/A	N/A	N/A	N/A					
		N/A						

	Estimated last year (Sept 2023 – Aug 2024)			Actual (Aug'23-July'24)			Forecast (Sept 2024 – Aug 2025)		
Dhace	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
Phase	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			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	

12A.	12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit								
					Certified PKE (MT)				
N/A	N/A	N/A	N/A	N/A	N/A	N/A			
	TOTAL								

13. Inde	13. Independent Smallholders Actual Sold Tonnage / Volume								
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE		



Current License period (Sept'23- July-24)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous L	Previous License period (August'23)						
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A.	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)	CPO Sold	Certified PK Sold (MT/credit)	PKO Sold	Certified PKE Sold (MT/credit)		
N/A	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.

Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639

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 **09**, **12-16/08/2024** 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 remote assessment was conducted on **02/11/2024.** 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.

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 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)		
Mosa Oil Mill	✓	✓	√	√	✓		
Nahavio Division	√	✓	√	√	✓		
Kavui Division	√	√	√	√	✓		
Siki Division	√	√	√	√	✓		
Buvussi Division	√	√	✓	√	✓		
Community Planting	✓	√	√	√	✓		
Independent Farms (more than 50 ha)	✓	√	√	√	√		

Tentative Date of Next Visit: August 11, 2025 – August 15, 2025

Total Number of Man-days: 15 Man-days

2.2 BSI Assessment Team

Name	Role	Competency
Mohd Razaleigh bin Mohamad (MRM)	Team Leader	Education: He graduated Bachelor (Scs.) Plantations Management and Agrotechnology from Universiti Teknologi Mara (UiTM) in 2012.
,		Work Experience: He gained his working exposure in the plantations sector, serving as Senior Assistant Manager with Tradewinds Plantations Berhad from 2012 until 2017 and has been doing audit for RSPO P&C, MSPO, since 2017 until now.
		Training attended:
		He has successfully completed ISO 9001:2015 (2020), ISO 14001:2015 (2017), ISO 45001:2018 (2021), Endorsed RSPO P&C Lead Auditor Course (2018), Endorsed MSPO P&C Lead Auditor Course (2017), Social Accountability SA8000 (2019), Endorsed RSPO Independent Smallholder (IHS), (2022).
		Language proficiency:
		Fluent in in both verbal/written Bahasa Malaysia and English Language
		Aspect covered in this audit:
		☑ Good Agriculture Practice ☑ Health and Safety ☑ Supply chain requirements
		☐ Social ☐ Environmental ☐ Market Communication and claim requirements
		☐ ISH context (ICS, internal audit, policy, business planning and trading system)



Nor Halis Abu Zar	Team member	Education:					
(NHA)		Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma In Plantation and Industry Management from UiTM in 2009.					
		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 MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.					
		Training attended:					
		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, 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, SMETA Requirement Training on May 2021, ISH Training by RSPO in 2023 and ILO Training on March 2024.					
		Language proficiency:					
		English and Bahasa Malaysia					
		Aspect covered in this audit:					
		☐ Good Agriculture Practice ☐ Health and Safety ☒ Supply chain requirements ☐ Social ☒ Environmental ☒ Market Communication and claim requirements ☐ ISH context (ICS, internal audit, policy, business planning and trading system)					
Valence Shem	Team Member	Education:					
(VSH)		BTech (Hons) Bachelor's Degree in Industrial Technology, University of Science Malaysia					
		Work Experience:					
		years working experience in oil palm plantation industry					
		2) Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA					
		Training attended:					
		1) ISO 14001 Lead Auditor Course					
		2) ISO 9001 Lead Auditor Course					
		3) Endorsed RSPO P&C Lead Auditor Course					
		4) Endorsed RSPO SCCS Lead Assessor Course5) MSPO Awareness Training					
		6) ISO 45000 Lead Auditor Course					
		7) SMETA Auditor training					
		8) HCV-HCS training					
		9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course					



Language proficiency:
English and Bahasa Malaysia
Aspect covered in this audit:
\square Good Agriculture Practice \square Health and Safety \square Supply chain requirements \boxtimes Social \square Environmental \square Market Communication and claim requirements \square ISH context (ICS, internal audit, policy, business planning and trading system)

Accompanying Persons:

Name	Role
Max Muakul Kuduk (MMK)	Local technical expert and translator. He holds a Master of Science Majoring in Modern Botanical Methods and a Bachelor of Science Majoring in Plant Science. He has experience in environmental and health & safety auditing. He has conducted conservation assessment for oil palm industry. His roles is as technical expert during the audit.
Alice Topa (ATP)	He holds a Master of Environment Management: The University of Queensland, Australia and Bachelor of Tropical Agriculture, University of Vudal, PNG. skilled and experienced in environment sustainability and, health and safety program management and monitoring, implementing legal and international standard audits such as Roundtable Sustainable Palm Oil (RSPO) and ISO 14001 (Environment Management Systems) standards.

2.3 Assessment Plan

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

Date	Time	Subjects	MRM	NHAZ	VS	MK	AT
Sunday, 04/08/2024	-	VS travel from Malaysia to Kimbe arriving on 05/08/2024			√		
Wednesday 07/08/2024		MRM and NHAZ travel from Malaysia to Kimbe on 08/08/2024	√	√			
Friday 09/08/2024 Mosa Palm Oil Mill	08.30 - 09.00	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√	√	√	√	√
	09.00 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc	√	√	V	V	√
	12.30 - 13.30	Lunch/ Break		•			



Date	Time	Subjects	MRM	NHAZ	VS	MK	AT
	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). RSPO Supply chain requirements for mill	V	√	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√	√	√
Monday 12/08/2024	09.00 - 12.30	Smallholders field visit, document review & interview – Nahavio Division (26 SH)	√	~	\checkmark	√	√
Nahavio Division	12.30 - 13.30	Lunch/ Break					
	13.30 - 16.30	Smallholders field visit, document review & interview (Cont.)	√	√	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√	√	√
Tuesday 13/08/2024	09.00 - 12.30	Smallholders field visit, document review & interview – Kavui Division (26 SH)	√	√	√	√	√
Kavui Division	12.30 - 13.30	Lunch/ Break					
	13.30 - 16.30	Smallholders field visit, document review & interview- Kavui Division (Cont.)	√	√	\checkmark	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	\checkmark	√	√
Wednesday 14/08/2024	09.00 - 12.30	Smallholders field visit, document review & interview – Siki Division (28 SH)	√	√		√	
Siki Division	10.00- 12.00	Stakeholders' consultation			\checkmark		√
	12.30 - 13.30	Lunch/ Break					
	13.30 - 16.30	Smallholders field visit, document review & interview- Siki Division (Cont.)	√	√	\checkmark	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√	√	√
Thursday 15/08/2024 Buvussi Division/	09.00 - 12.30	Smallholders field visit (Division/ Community Planting/ Independent Farm), document review & interview – (8 from Buvussi SH, 3 for community planting and 1 for independent farm)	√		√	√	√
Community Planting/	12.30 - 13.30	Lunch/ Break					



Date	Time	Subjects	MRM	NHAZ	VS	MK	AT
Independen t Farm	13.30 - 16.30	Smallholders field visit, document review & interview- Division/ Community Planting/ Independent Farm (Cont.)	√	√	√	>	√
	1600- 1630	Preparation for closing meeting	√	√	√	√	√
	1630- 1700	Closing meeting	√	√	√	√	√

Major Non-conformities closure visit plan

Date	Time	Subjects	MRM	NHA
Saturday 02/11/2024	8.00 am (KL Time) 10.00 am (PNG Time)	Opening Meeting via Microsoft Teams	√	√
Mosa POM & Supply Bases Numondo POM & Supply Bases Kumbango POM & Supply Bases	8.30 am (KL Time) 10.30 am (PNG Time)	Verification on previous Major NC: Mosa POM 2535169-202408-M1 (3.6.1) 2535169-202408-M2 (3.8.11) Numondo POM 2535204-202408-M1 (3.6.1) 2535204-202408-M2 (GCC 4.3) 2535204-202408-M3 (6.6.2) Kumbango POM 2538795-202408-M1 (3.6.3) 2538795-202408-M2 (1.1.4) Site observation, workers interview (individual and group session) if necessary (Via Microsoft Teams & Video Call) Document review – implemented evidence	√	√
	15.00 pm (KL Time) 17.00 am (PNG Time)	Closing Meeting	√	√



Section 3: Assessment Findings

Multiple Management Units and Time Bound Plan 3.1

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?	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad)TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. On 16/01/2020, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad)under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://simedarbyplantation.com/simedarby-plantation-completes-the-divestment-of-its-liberia-operations/	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	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have no control in the management. Refer TBP approval dated 13/07/2023.	Complied



	The second secon	
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.	There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 July 2023 for these Estate. (1) Ladang Panjang Estate: 1,796.19 Ha. (2) Rantau Panjang Estate, Napal Estate / Karang Ringin Estate: 1,843.73 Ha. (3) Mangun Jaya Estate: 1,398.55 Ha. (4) Sungai Jernih Estate: 851.57 Ha. (5) Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL): 4,071.76 Ha. (6) Karya Palma Estate (PT SNP): 476.70 Ha. West and East Estate: 1,452.93 Ha.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there is deviation has been identified at those Indonesia management units, but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.	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?	 Indonesia PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties were sold and currently SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad)have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. 	Complied
	 Malaysia Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO 	



	certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction. Liberia - As at 16/01/2020 SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad)under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation (Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://simedarbyplantation.com/simedarby-plantation-completes-thedivestment-of-its-liberia-operations/. ACOP 2022 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
Un-Certified Units or Holdings		
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.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/ 2023.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	New plantings within SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad)that have completed NPP notification: (1) NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/ (2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018	Complied



 no comments
 https://rspo.org/publicconsultation/new-britain-palm-oil-asubsidiary-of-sime-darby-plantationbhd-quadalcanal-plain-palm-oil-ltd/

- (3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/
- (4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/
- (5) NBPOL (Higaturu Oil Palms)
 21/06/2016
 no comments
 https://rspo.org/publicconsultation/new-britain-palm-oil-ltdhigaturu-oil-palms/
- (6) NBPOL (Poliamba Limited Lamawan) 07/04/2014 no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/
- (7) NBPOL (Poliamba Limited Lamendauen) 07/04/ 2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/
- (8) NBPOL (Roka Mini estate) 04/11/2013

 no comments captured in RSPO website

 https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/
- (9) NBPOL (J estate) 01/11/2013– no comments captured in RSPO website



Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been	Complied
And land and the surfiction	Management units for 12 – 14 above were disposed.	C !! . !
	(14) Sime Darby (Liberia) Plantation Inc 06/03/2012 — no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/	
	(13) Sime Darby (Liberia) Plantation Inc 06/03/2012 — no comments captured in RSPO website https://rspo.org/public- consultation/sime-darby-liberia- plantation-inc-new-planting- assessment-1/	
	(12) Sime Darby (Liberia) Plantation Inc 06/03/2012 — no comments captured in RSPO website https://rspo.org/public- consultation/sime-darby-liberia- plantation-inc-new-planting- assessment/	
	(11) NBPOL (Ramu Agri Industries Ltd) 06/03/2012 - no comments captured in RSPO website: https://rspo.org/public- consultation/rail-new-planting- assessment-call-for-comments/	
	(10) NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public- consultation/new-britain-palm-oil- limited-higaturu-oil-palm/	
	https://rspo.org/public- consultation/new-britain-palm-oil-ltd-j- estate/	



with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	excluded in the latest TBP as both sites was disposed. The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO. As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C. It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	audit. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad)have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism. As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, no labour dispute issues reported. It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit. SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad)have published Grievance mechanism that is applied to all management units. Disputes related to labour, stakeholders and communities are to be dealt using this mechanism	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) maintains corporate governance to monitor and	Complied



	address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country. Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.	
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 available and justified.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue is mainly waiting for Land Titles. The last audit was conducted in 16-25 Oct 2023, and 13-17 Nov 2023. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.	Complied
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 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. The last audit was conducted in 16-25 Oct 2023, and 13-17 Nov 2023.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites are maintaining the stakeholder engagements as part of the estates/mills' operations. Especially in Indonesia, socialization of company. Latest conducted in August 2023	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.	By the definition of the National Interpretation, the smallholders and outgrowers attached to NBPOL-WNB are considered as independent smallholders. However, NBPOL-WNB has ensure that there smallholders are certified together with the current certification.	Complied							



Approved Time Bound Plan

Name of the Unit of Certification	Country	Name of the Mills and Supply Bases	Area (Ha)	Certification Status (Certified /	Plan Year for Certification	Certification Year	Date of Last TBP Verified and Approved	REVISION OF		on is made)	
(UoC)				Not certified)			by CB	Any revision	Proposed	Justification of changes for each UoC	Date of approval from RSPO
Manggala	Indonesia	Manggala Mill	13.836	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -1 Estate	4.919	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -2 Estate	4.922	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -3 Estate	3.995	Certified	Not Applicable	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3.759	Certified	Not Applicable	16-Jan-12					
	Indonesia	Alur Dumai Estate	3.759	Certified	Not Applicable	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	NA		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	Not Applicable	11-Oct-11					
Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	Not Applicable	3-May-13					



	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	Not Applicable	3-May-13				
	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	Not Applicable	3-May-13				
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	Not Applicable	3-May-13				
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	Not Applicable	3-May-13				
Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	Not Applicable	11-Oct-11				
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	Not Applicable	11-Oct-11				
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	Not Applicable	11-Oct-11				
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	Not Applicable	11-Oct-11				
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	Not Applicable	1-Apr-14				
	Indonesia	Mandah Estate	5,053.18	Certified	Not Applicable	1-Apr-14				
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	Not Applicable	1-Apr-14				
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.513	Certified	Not Applicable	11-Sep-12				
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	Not Applicable	11-Sep-12				
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	Not Applicable	11-Sep-12				
Ladang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	Not Applicable	9-Jul-12				
Panjang	Indonesia	Ladang Panjang Estate	1,202.04	Certified	Not Applicable	9-Jul-12				
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA	Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	Not Applicable	16-Mar-12				
	Indonesia	Bumi Ayu Estate	2,960.98	Certified	Not Applicable	16-Mar-12				
	•									



Rantau	Indonesia	Rantau Panjang Estate	2,679.74	Certified	Not Applicable	16-Mar-12				
Panjang	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA	Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	Not Applicable	16-Mar-12				
	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A	Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	Not Applicable	16-Mar-12				
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A	Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A	Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
Angsana	Indonesia	Angsana Mill	15,151,19	Certified	Not Applicable	6-Jul-11				
	Indonesia	Angsana Estate	3,250.06	Certified	Not Applicable	6-Jul-11				



	Indonesia	Gunung Sari Estate	2,826.94	Certified	Not Applicable	6-Jul-11		
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	Not Applicable	3-Jul-13		
Trastika	Indonesia	Mustika Estate	3.648.74	Certified	Not Applicable	3-Jul-13		
					1			
	Indonesia	Pantai bonati Estate	2,534.00	Certified	Not Applicable	6-Jul-11		
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	Not Applicable	5-Jul-11		
	Indonesia	Gunung Aru Estate	2,684.41	Certified	Not Applicable	5-Jul-11		
	Indonesia	Gunung Kemasan Estate	3,511.36	Certified	Not Applicable	5-Jul-11		
	Indonesia	Laut Timur Estate	3,207.28	Certified	Not Applicable	5-Jul-11		
	Indonesia	Pantai Timur Estate	3,337.49	Certified	Not Applicable	5-Jul-11		
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	Not Applicable	10-Jul-12		
	Indonesia	Ungkaya Estate	4,145.00	Certified	Not Applicable	10-Jul-12		
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	Not Applicable	30-Dec-11		
	Indonesia	Rantau Estate	4,638.00	Certified	Not Applicable	30-Dec-11		
	Indonesia	Matalok Estate	3,082.00	Certified	Not Applicable	30-Dec-11		
	Indonesia	Selabak Estate (PT SAA)	3.757.67	Certified	Not Applicable	16-Mar-12		
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	Not Applicable	16-Mar-12		
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	Not Applicable	16-Mar-12		
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	Not Applicable	16-Mar-12		
Betung	Indonesia	Betung Mill	7,579.57	Certified	Not Applicable	1-Apr-14		
	Indonesia	Betung Estate	4,266.00	Certified	Not Applicable	1-Apr-14		
	Indonesia	Sekayu Estate	3,313.57	Certified	Not Applicable	1-Apr-14		
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	Not Applicable	16-Mar-12		

...making excellence a habit."

Page 28 of 185



	Tudousia	Dahuman Fatata	2.050.42	C4:6:-4	Nat Analiaabla	1C Mai: 12		
	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12		
	Indonesia	Bakau Estate	5,342.14	Certified	Not Applicable	16-Mar-12		
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	Not Applicable	16-Mar-12		
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	Not Applicable	16-Mar-12		
	Indonesia	Pondok Labu Estate	3,569.53	Certified	Not Applicable	16-Mar-12		
	Indonesia	Binturung Estate	4,072.01	Certified	Not Applicable	16-Mar-12		
	Indonesia	Rampa Estate	3,656.20	Certified	Not Applicable	16-Mar-12		
	Indonesia	Sesulung Estate	4,578.46	Certified	Not Applicable	16-Mar-12		
Sekunyir	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10		
	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10		
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10		
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11		
	Indonesia	Sukamandang Estate	3,936.56	Certified	Not Applicable	5-Jul-11		
	Indonesia	Sapiri Estate	3,530.90	Certified	Not Applicable	5-Jul-11		
	Indonesia	Baras Danum Estate	3,664.60	Certified	Not Applicable	5-Jul-11		
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	Not Applicable	5-Jul-11		
Pemantang	Indonesia	Pemantang Mill	16,601.66	Certified	Not Applicable	5-Jul-11		
	Indonesia	Pemantang Estate	3,857.91	Certified	Not Applicable	5-Jul-11		
	Indonesia	Kawan Batu Estate	4,400.00	Certified	Not Applicable	5-Jul-11		
	Indonesia	Hatantiring Estate	3,811.00	Certified	Not Applicable	5-Jul-11		
	Indonesia	Batang Garing Estate	4,532.75	Certified	Not Applicable	5-Jul-11		
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14		

...making excellence a habit."

Page 29 of 185





	To do o o o i -	Laurahim, Estata	4 020 40	C4:6:-4	Net Analisati	2.1.1.14				
	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14				
	Indonesia	Awatan Estate	3,476.79	Certified	Not Applicable	3-Jul-14				
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	Not Applicable	3-Jul-19				
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A	Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A	Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A	Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	Not Applicable	18-Oct-10				
	Indonesia	West Estate	4,562.34	Certified	Not Applicable	18-Oct-10				
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A	Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
	Indonesia	East Estate	2,665.48	Certified	Not Applicable	18-Oct-10				



	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A	Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	Not Applicable	12-Aug-10				
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10				
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10				
	Malaysia	Somme Estate	941.56	Certified	Not Applicable	12-Aug-10				
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	Not Applicable	12-Aug-10				
	Malaysia	Padang Buluh Estate	4,008.47	Certified	Not Applicable	12-Aug-10				
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	Not Applicable	12-Aug-10				
	Malaysia	Jentayu Estate	2,178.59	Certified	Not Applicable	12-Aug-10				
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	Not Applicable	5-Oct-11				
	Malaysia	Chersonese Estate	3,293.72	Certified	Not Applicable	5-Oct-11				
	Malaysia	Kalumpong Estate	2,716.80	Certified	Not Applicable	5-Oct-11				
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11				
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11				
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11				
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11				
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11				
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11				
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11				





	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11			
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	Not Applicable	5-Oct-11			
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11			
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11			
Seri	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11			
Intan/Selaba	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11			
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11			
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11			
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11			
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11			
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11			
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11			
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11			
	Malaysia	Tennamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11			
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11			
	Malaysia	Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11			
Bukit	Malaysia	Bukit Benut Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11			
Kerayong	Malaysia	Bukit Benut Estate	2,699.28	Certified	Not Applicable	15-Apr-11			
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11			
East	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10			
	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10			



		T			ı			1
	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10		
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10		
West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10		
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10		
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11		
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11		
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11		
	Malaysia	Kerdau Estate	5,683.04	Certified	Not Applicable	7-Jul-11		
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11		
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11		
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11		
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11		
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11		
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11		
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11		
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10		
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10		
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10		
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14		
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14		
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14		
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14		

...making excellence a habit."

Page 33 of 185



				1		1	1		1	1
	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14				
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14				
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14				
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14				
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11				
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11				
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11				
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11				
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11				
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11				
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11				
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11				
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10				
	Malaysia	Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10				
	Malaysia	Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10				
	Malaysia	Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10				
	Malaysia	Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10				
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11				
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11				
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11				
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11				



			1	1	1	
Pagoh Chaah Gunung Mas Bukit Benut	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14
	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10
Gunung Mas	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11
	Malaysia	Bukit Benut Estate	2,799.78	Certified	Not Applicable	5-Oct-11
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11
	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11

...making excellence a habit."

Page 35 of 185



		1	1	I	1			1
	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11		
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11		
Bukit Kerayong Sandakan Bay	Malaysia	Bukit Kerayong Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11		
Kerayong	Malaysia	Sri Pulai Estate	2,049.87	Certified	Not Applicable	29-Mar-11		
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11		
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11		
	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11		
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08		
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08		
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08		
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08		
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08		
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08		
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11		
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11		
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11		
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09		
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09		
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09		
	Malaysia	Tingkayu Estate	1,881.08	Certified	Not Applicable	16-Jan-09		
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09		
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09		

...making excellence a habit."

Page 36 of 185



Malaysia Merotai Estate 3,052.66 Certified Not Applicable 16-Jan-09								 	 	
Merotai Malaysia Merotai Oil Mill 11,545.71 Certified Not Applicable 16-Jan-09 Malaysia Malaysia Merotai Estate 3,052.66 Certified Not Applicable 16-Jan-09 16-Jan-09 Malaysia Tinger Estate 2,497.86 Certified Not Applicable 16-Jan-09 Malaysia Table Estate 2,221.63 Certified Not Applicable 16-Jan-09 Malaysia Lavang Oil Mill 24,836.54 Certified Not Applicable 30-Dec-11 Malaysia Lavang Estate 4,363.83 Certified Not Applicable 30-Dec-11 Malaysia Rasan Estate 3,454.00 Certified Not Applicable 30-Dec-11 Malaysia Belian Estate 2,847.00 Certified Not Applicable 30-Dec-11 Malaysia Lavang (Special) Estate 2,460.00 Certified Not Applicable 30-Dec-11 Malaysia Pekaka Estate 2,626.14 Certified Not Applicable 30-Dec-11 Malaysia Ruai Estate		Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09			
Malaysia Merotai Estate 3,052,66 Certified Not Applicable 16-Jan-09		Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09			
Malaysia Imam Estate 3,773.56 Certified Not Applicable 16-Jan-09	Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09			
Malaysia Tiger Estate 2,497.86 Certified Not Applicable 16-Jan-09		Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09			
Malaysia Table Estate 2,221.63 Certified Not Applicable 16-Jan-09		Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09			
Malaysia Lavang Oil Mill 24,836.54 Certified Not Applicable 30-Dec-11 Malaysia Lavang Estate 4,363.83 Certified Not Applicable 30-Dec-11 Malaysia Rasan Estate 3,454.00 Certified Not Applicable 30-Dec-11 Malaysia Belian Estate 2,847.00 Certified Not Applicable 30-Dec-11 Malaysia Kelida Estate 2,460.00 Certified Not Applicable 30-Dec-11 Malaysia Lavang (Special) Estate included under Lavang Estate Ha Malaysia Pekaka Estate 2,626.14 Certified Not Applicable 30-Dec-11 Malaysia Ruai Estate 2,460.96 Certified Not Applicable 30-Dec-11 Malaysia Dulang Estate 2,548.00 Certified Not Applicable 30-Dec-11 Malaysia Charquest Estate 1,448.71 Certified Not Applicable 30-Dec-11 Malaysia Paroh Estate 2,627.90 Certified Not Applicable 30-Dec-11 Malaysia Paroh Estate 2,627.90 Certified Not Applicable 30-Dec-11		Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09			
MalaysiaLavang Estate4,363.83CertifiedNot Applicable30-Dec-11MalaysiaRasan Estate3,454.00CertifiedNot Applicable30-Dec-11MalaysiaBelian Estate2,847.00CertifiedNot Applicable30-Dec-11MalaysiaKelida Estate2,460.00CertifiedNot Applicable30-Dec-11MalaysiaLavang (Special) Estateincluded under Lavang Estate HaNot Applicable30-Dec-11MalaysiaPekaka Estate2,626.14CertifiedNot Applicable30-Dec-11MalaysiaRuai Estate2,460.96CertifiedNot Applicable30-Dec-11MalaysiaDulang Estate2,548.00CertifiedNot Applicable30-Dec-11MalaysiaCharquest Estate1,448.71CertifiedNot Applicable30-Dec-11MalaysiaParoh Estate2,627.90CertifiedNot Applicable30-Dec-11		Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09			
MalaysiaRasan Estate3,454.00CertifiedNot Applicable30-Dec-11MalaysiaBelian Estate2,847.00CertifiedNot Applicable30-Dec-11MalaysiaKelida Estate2,460.00CertifiedNot Applicable30-Dec-11MalaysiaLavang (Special) EstateIncluded under Lavang Estate HaNot Applicable30-Dec-11MalaysiaPekaka Estate2,626.14CertifiedNot Applicable30-Dec-11MalaysiaRuai Estate2,660.96CertifiedNot Applicable30-Dec-11MalaysiaDulang Estate2,548.00CertifiedNot Applicable30-Dec-11MalaysiaCharquest Estate1,448.71CertifiedNot Applicable30-Dec-11MalaysiaParoh Estate2,627.90CertifiedNot Applicable30-Dec-11	Lavang	Malaysia	Lavang Oil Mill	24,836.54	Certified	Not Applicable	30-Dec-11			
MalaysiaBelian Estate2,847.00CertifiedNot Applicable30-Dec-11MalaysiaKelida Estate2,460.00CertifiedNot Applicable30-Dec-11MalaysiaLavang (Special) Estateincluded under Lavang Estate HaNot Applicable30-Dec-11MalaysiaPekaka Estate2,626.14CertifiedNot Applicable30-Dec-11MalaysiaRuai Estate2,460.96CertifiedNot Applicable30-Dec-11MalaysiaDulang Estate2,548.00CertifiedNot Applicable30-Dec-11MalaysiaCharquest Estate1,448.71CertifiedNot Applicable30-Dec-11MalaysiaParoh Estate2,627.90CertifiedNot Applicable30-Dec-11		Malaysia	Lavang Estate	4,363.83	Certified	Not Applicable	30-Dec-11			
MalaysiaKelida Estate2,460.00CertifiedNot Applicable30-Dec-11MalaysiaLavang (Special) Estateincluded under Lavang Estate HaNot Applicable30-Dec-11MalaysiaPekaka Estate2,626.14CertifiedNot Applicable30-Dec-11MalaysiaRuai Estate2,460.96CertifiedNot Applicable30-Dec-11MalaysiaDulang Estate2,548.00CertifiedNot Applicable30-Dec-11MalaysiaCharquest Estate1,448.71CertifiedNot Applicable30-Dec-11MalaysiaParoh Estate2,627.90CertifiedNot Applicable30-Dec-11		Malaysia	Rasan Estate	3,454.00	Certified	Not Applicable	30-Dec-11			
Malaysia Lavang (Special) Estate included under Lavang Estate Ha Malaysia Pekaka Estate 2,626.14 Certified Not Applicable 30-Dec-11 Malaysia Ruai Estate 2,460.96 Certified Not Applicable 30-Dec-11 Malaysia Dulang Estate 2,548.00 Certified Not Applicable 30-Dec-11 Malaysia Charquest Estate 1,448.71 Certified Not Applicable 30-Dec-11 Malaysia Paroh Estate 2,627.90 Certified Not Applicable 30-Dec-11		Malaysia	Belian Estate	2,847.00	Certified	Not Applicable	30-Dec-11			
under Lavang Estate Ha Malaysia Pekaka Estate 2,626.14 Certified Not Applicable 30-Dec-11 Malaysia Ruai Estate 2,460.96 Certified Not Applicable 30-Dec-11 Malaysia Dulang Estate 2,548.00 Certified Not Applicable 30-Dec-11 Malaysia Charquest Estate 1,448.71 Certified Not Applicable 30-Dec-11 Malaysia Paroh Estate 2,627.90 Certified Not Applicable 30-Dec-11		Malaysia	Kelida Estate	2,460.00	Certified	Not Applicable	30-Dec-11			
Malaysia Ruai Estate 2,460.96 Certified Not Applicable 30-Dec-11 Malaysia Dulang Estate 2,548.00 Certified Not Applicable 30-Dec-11 Malaysia Charquest Estate 1,448.71 Certified Not Applicable 30-Dec-11 Malaysia Paroh Estate 2,627.90 Certified Not Applicable 30-Dec-11		Malaysia	Lavang (Special) Estate	under Lavang	Certified	Not Applicable	30-Dec-11			
MalaysiaDulang Estate2,548.00CertifiedNot Applicable30-Dec-11MalaysiaCharquest Estate1,448.71CertifiedNot Applicable30-Dec-11MalaysiaParoh Estate2,627.90CertifiedNot Applicable30-Dec-11		Malaysia	Pekaka Estate	2,626.14	Certified	Not Applicable	30-Dec-11			
Malaysia Charquest Estate 1,448.71 Certified Not Applicable 30-Dec-11 Malaysia Paroh Estate 2,627.90 Certified Not Applicable 30-Dec-11		Malaysia	Ruai Estate	2,460.96	Certified	Not Applicable	30-Dec-11			
Malaysia Paroh Estate 2,627.90 Certified Not Applicable 30-Dec-11		Malaysia	Dulang Estate	2,548.00	Certified	Not Applicable	30-Dec-11			
		Malaysia	Charquest Estate	1,448.71	Certified	Not Applicable	30-Dec-11			
Rajawali Malaysia Rajawali Oil Mill 14,104.45 Certified Not Applicable 30-Dec-11		Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11			
	Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11			



	T	l	T	T	T	T T	1	1	
	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11			
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11			
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11			
	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11			
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11			
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11			
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11			
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11			
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11			
Guadalcanal Plains Palm Oil	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11			
Limited (GPPOL)	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11			
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11			
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11			
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11			
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11			
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11			
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11			

...making excellence a habit."

Page 38 of 185



Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13			
	PNG	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13			
	PNG	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13			
	PNG	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13			
	PNG	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13			
	PNG	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13			
	PNG	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13			
	PNG	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13			
	PNG	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13			
	PNG	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13			
	PNG	Smallholders - West Sagarai Estate (212)	345.96	Certified	Not Applicable	15-Feb-13			
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	Not Applicable	19-Mar-12			
	PNG	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12			
	PNG	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12			
	PNG	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12			
	PNG	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12			
	PNG	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12			
	PNG	Smallholders -North Division (615)	1,022.12	Certified	Not Applicable	19-Mar-12			

...making excellence a habit."



	PNG	Smallholders- South Division (866)	1,257.21	Certified	Not Applicable	19-Mar-12	
	PNG	Smallholders -West Division (309)	533.54	Certified	Not Applicable	19-Mar-12	
Ramu Agricultrual	Papua New Guinea	Gusap Mill	14,606.08	Certified	Not Applicable	5-Aug-10	
Industries Ltd (RAIL)	PNG	Gusap East (Gusap) Estate	2,856.45	Certified	Not Applicable	5-Aug-10	
	PNG	Gusap West (Paddox) Estate	3,019.09	Certified	Not Applicable	5-Aug-10	
	PNG	Surinam Estate	2,154.14	Certified	Not Applicable	5-Aug-10	
	PNG	Dumpu Estate	2,254.36	Certified	Not Applicable	5-Aug-10	
	PNG	Ngaru Estate	854.33	Certified	Not Applicable	5-Aug-10	
	PNG	J Estate (Jephcott) Estate	2,824.01	Certified	Not Applicable	5-Aug-10	
	PNG	Smallholders - Madang VOPs (71)	360.00	Certified	Not Applicable	5-Aug-10	
	PNG	Smallholders - Morobe VOPs (253)	283.70	Certified	Not Applicable	5-Aug-10	
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	Not Applicable	1-Feb-13	
	PNG	Mamba Oil Mill		Certified	Not Applicable	1-Feb-13	
	PNG	Embi Estate	1,737.78	Certified	Not Applicable	1-Feb-13	
	PNG	Ambogo Estate	2,040.00	Certified	Not Applicable	1-Feb-13	
	PNG	Sangara Estate	1,780.00	Certified	Not Applicable	1-Feb-13	
	PNG	Sumbiripa Estate	2,545.00	Certified	Not Applicable	1-Feb-13	

...making excellence a habit."

Page 40 of 185



		T	I	T		1		1	T	1
	PNG	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13				
	PNG	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13				
	PNG	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13				
	PNG	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13				
	PNG	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13				
	PNG	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13				
	PNG	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13				
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08				
	PNG	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08				
	PNG	Kapiura Mill		Certified	Not Applicable	10-Sep-08				
	PNG	Numundo Mill		Certified	Not Applicable	10-Sep-08				
	PNG	Waraston Mill		Certified	Not Applicable	10-Sep-08				
	PNG	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08				
	PNG	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08				
	PNG	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08				
	PNG	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08				
	PNG	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08				
	PNG	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08				



PNG	Karausu Estate	2,387.64	Certified	Not Applicable	10-Sep-08			
PNG	Moroa Estate	848.16	Certified	Not Applicable	10-Sep-08			
PNG	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08			
PNG	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08			
PNG	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08			
PNG	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08			
PNG	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08			
PNG	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08			
PNG	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08			
PNG	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08			
PNG	Nomundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08			
PNG	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08			
PNG	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08			
PNG	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08			
PNG	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08			
PNG	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08			
PNG	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08			
PNG	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08			
PNG	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08			

...making excellence a habit."

Page 42 of 185



	PNG	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08	
	PNG	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08	
	PNG	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08	
	PNG	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08	
Markham Farming Company Limited (MFCL)/Markh am Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20	There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.
	PNG	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20	
	PNG	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20	
	PNG	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20	



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 2 (Two) Critical; 2 (Two) Minor nonconformities and 3 (Three) Opportunity For Improvement raised. The SD Guthrie Mosa POM, NBPOL 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 (not applicable for RSPO ISH standard/audit). 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 #	253516	59-202408-M1	Issued Date	16/08/2024				
Due Date	14/11/	2024	Closure Date	08/11/2024				
Indicator & Category (Critical / Minor)	3.6.1 (Critical)						
Statement of Nonconformity:	Advice	related Procedures of	on Safety & Health Plan was	not fully executed.				
Requirement Reference:	Organi			e advice and training on ivities.				
Objective Evidence:	matter	Internal Audit has been conducted on 25/05/2024 however there is some matters yet to be advice as per site visit at Akami Estate. Evidence was sighted as below:						
	1)	the Safety Data Sho	area: Soap was not available eet (SDS) for Glyphosate, w I soap in the event of conta	hich requires washing with				
	2)	•	No First Aid Box/First Aid King in the office, mixing area and general store.					
			rith the Operational Safety I d July 2023, Section 5.2 on	_				
	3) Field C: First Aid box was available with a designated first aider, however, the box contained no listed items, and two items (sterile water) had expired in 2020.							
	 Tools Store: Safety Data Sheet (SDS) for Petrol and lubricants was not available in case of emergency purposes. 							
	Auditor reference and verification were based on the "Operational Safety Management Plan for Smallholders", July 2023, Issue 8, and the Smallholder Internal Audit QIP Form dated 25/05/2024.							



	Further verification through interview with the estate owner, he unable to demonstrate his understanding on the management plan established.
Corrections:	1. Chemical Storage Area:
	 Immediately supply and place soap in the Chemical Storage Area as per the Safety Data Sheet (SDS) requirements. Ensure that this soap is readily accessible for all personnel working in or near the chemical storage area. Refresher training for all chemical handlers on personal hygiene and clean up after spraying activity conducted.
	2. Office Compound:
	 Immediately provide First Aid Kits in all necessary locations within the office compound, including the office, mixing area, tools area, manager's house, tools store, and general store. These kits must be fully stocked according to the specifications in the First Aid SOP.
	 Training / Refresher training to be done to all First Aider.
	3. Field C:
	 Immediately replace the expired sterile water and restock the First Aid box in Field C with all required items. Verify that the box is in full compliance with First Aid SOP.
	First Aider to do refresher training on the use and check on the First Aid Kit.
	4. Tool store:
	 Ensure that the Safety Data Sheet (SDS) for Petrol and lubricants is immediately available in the Tools Store for reference in case of emergencies.
	To train the petrol and lubricant handlers on SDS requirements.
Root Cause Analysis:	 Chemical Storage Area: The absence of soap in the chemical storage area is likely due to inadequate oversight and monitoring of compliance with SDS requirements. This suggests a gap in the routine checks and awareness among the staff responsible for maintaining the area.
	 Office Compound: The missing First Aid Kits indicate a gap in the implementation of the First Aid SOP. This could be due to insufficient training for personnel or a lapse in the monitoring and auditing processes that ensure compliance with safety standards.
	3. Field C: The presence of expired items in the First Aid box points to a systemic issue with the maintenance and regular inspection of first aid box. This is likely due to a lack of an effective inventory management system.
	Tools Store: The unavailability of the SDS for Petrol and lubricants suggests a lack of proper record-keeping practices and insufficient training or awareness among staff about the critical nature of maintaining and accessing safety documentation.
Corrective Actions:	1. Chemical Storage Area:



	 Implement regular inspection routine for the Chemical Storage Area, ensuring that all safety equipment, including soap, is in place and in compliance with SDS requirements. Conduct training sessions for all relevant personal on the importance of adhering to SDS guidelines.
	2. Office Compound:
	Establish a workplace inspection schedule to regularly inspect all areas within the office compound, ensuring that First Aid Kits are present and fully stocked ascerding to the First Aid SOP.
	 fully stocked according to the First Aid SOP. Conduct training for all first aiders on the critical importance of First Aid Kits, including where they are located and how to maintain them.
	3. Field C:
	 Implement a checklist-based inspection, where designated first aiders must verify the compliance of the First Aid box contents routinely.
	4. Tools Store:
	 Train staff on the importance of SDS documents and how to access and utilize them in emergency situations.
	Implement a periodic inspection where the availability and accessibility of SDS documents are checked, and any gaps are immediately addressed.
Assessment Conclusion:	Verification has been done.
	 Video that has been provided which shows that 1st aid with sufficient item, soap and MSDS has placed at chemical store, office compound, during the operation and tools store.
	 Training records for 1st aid and MSDS has been conducted for smallholder affair (SHA) department and small estates owner/workers on 31/10/2024, bumbag content training on 18/10/2024, SDS training on 31/10/2024.
	3. Workplace inspection for first aid, SDS, and Soap conducted on 29/10/2024 and 1st aid inspection conducted on 31/10/2024.
	 Interview has been conducted for sample workers and representative from Smallholder Affair (SHA) Department confirmed that they can demonstrate their understanding on the training.
	All evidence verified and sufficient to close the Major Non-conformities.

Non-conformity							
NCR Ref #	2535169-202408-M2	Issued Date	16/08/2024				
Due Date	14/11/2024	Closure Date	08/11/2024				



Indicator & Category (Critical / Minor)	3.8.11 (Critical)						
Statement of Nonconformity:	CB has not been informed on new contractors prior to the audit.						
Requirement Reference:	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.						
Objective Evidence:	There are 2 contractors which physical handling the RSPO certified product which are Abaca Heavy Equipment LTD for CSPO transporters appointed on 08/07/2024 and HSK LTD for CSPK transport appointed on 05/01/2024.						
	It has been verified base on the contract agreement Labour and contract services agreement contract no: 2024-01 for CSPK transport to Kumbango Oil Mill between New Britain Palm Oil Limited and HSK Ltd and Labour and contract services agreement contract no: 2024-01 for CSPO transport to Kumbango refinery between New Britain Palm Oil Limited and Abaca Heavy Equipment Ltd.						
	However, there is no notification has made to the CB on the new appointment on contractor prior to the audit.						
Corrections:	Immediately inform the Certification Body (CB) about the new contractors— Abaca Heavy Equipment LTD for CSPO transport and HSK LTD for CSPK transport—providing their names and contact details as required.						
Root Cause Analysis:	The failure to inform the CB about the new contractors prior to the audit likely stems from a breakdown in communication or a lack of understanding of the RSPO requirements.						
Corrective Actions:	 Amend the current SSC guideline to include the notification of CB of any new contractors engaged in the physical handling of RSPO-certified products. 						
	Conduct mandatory training sessions for all relevant staff, particularly those involved in contractor management and audit preparation, to ensure they are fully aware of this requirement.						
	 Establish a regular review process for the contractor management procedures to ensure they remain up to date with RSPO requirements and any changes in the organization's operations. 						
	 Assign a designated contractor management officer or team responsible for coordinating and managing contractor appointments and ensuring that all required notifications are made to the CB in a timely manner. 						
	Review names and contact detail for all contractors engaged in physical handling of RSPO certified oil palm products for NBPOL WNB.						
Assessment Conclusion:	 Notification has been made BSI Services (M) Sdn Bhd on 20/08/2024 based on email sent by Benjamin Osa to Ms Emmi Nur Syuhada. 						
	 Communication through email to all the head of operating unit and department regards to amendment of contractor monitoring dated 07/11/2024 document reference Contractor-Service Provider Compliance Monitoring version 4_2024 						



3. Sample of 2 contractors which that has been filled up which
include requirement to notify the CBs.
All evidence reviewed is sufficient to close the Major Non-conformities.

Non-conformity			
NCR Ref #	2535169-202408-N1	Issued Date	16/08/2024
Due Date	Next ASA	Closure Date	Open
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	There is no mechanism t Procedure and chemical wa	to check the consistency of aste disposal procedure.	the Chemical Handling
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place. Smallholder requirements: Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance. - Minor Compliance -		
Objective Evidence:	petrol and Lubricar store for paint with It was not in line 20/06/2022 stated for hazardous subs Based on site visit a were two units of contain sulphuric a tenant. This is not in-line w reads "DO NOT Isopropanol, Teepo without Mill Manage	gas Area, it was found that 3 ont was not labelled and has becout any warning signage. e with SOP Chemical Stora in Section 2 "The area should tances with each chemical storated to the Mosa Oil Mill labour quarters 20 It empty jerry cans (basicid) found to be placed outs with the company's Chemical World take Empty Chemical Col, hexane & petroleum ether dement's approval.	ge and Handling dated d have adequate signage orage labelled". 5, house no. DLQ7A, there ed on the label, used to ide the bathroom by the laste Disposal SOP, which ontainers (H ₂ SO ₄ , HCL, containers) out of the Mill
	0375) Anton Yamba Active Ingredient, (Without label) wa Based on intervion smallholders' husba in line with Procedu	a, it was found out that Chem Glufosinate Container with as placed directly on the grow ew and verification, the and, the PPE used was only some are Pesticide Practices Smallhor 7 Section 2.11 Pesticide storage	ical Brand Name; Tarang, h Lubricant and Petrol und in the storage area. spraying conducted by surgical mask. It was not lders Affairs Management



C	4 M DOM B: A
Corrections:	 Mosa POM – Biogas Area: Correction: Immediately label all containers of petrol and lubricant in the Biogas Area and ensure they are stored separately from paint, with appropriate warning signage installed as per the SOP on Chemical Storage and Handling.
	2. Mosa Oil Mill – Labour Quarters (House No. DLQ7A):
	Correction: Remove the empty jerry cans that previously contained hazardous chemicals and ensure they are disposed of according to the Chemical Waste Disposal SOP. Re-educate the mill workers and the housing tenants on the correct disposal procedures and non-allowable practices for bringing the chemical container to the housing area without management approval.
	3. Smallholder Farm – Nahavio Div-Morokea VOP (016-0375):
	Correction: Immediately remove the unlabelled containers of lubricant and petrol from the ground in the storage area and store them properly.
	PPE Distribution & Monitoring
	 Supply of PPE: Smallholders have access to appropriate PPE (gloves, masks, goggles, boots, overalls) purchased from WNB.
	 Records of PPE Distribution: A PPE log is now maintained by smallholders Department, showing when and what PPE was distributed to trained growers towards ensuring they have the necessary equipment
Root Cause Analysis:	1. Mosa POM – Biogas Area: The lack of labelling and improper storage of chemicals suggests a failure in enforcing the Chemical Handling Procedure. This might be due to inadequate training or insufficient oversight by the staff responsible for maintaining chemical storage areas.
	 Mosa Oil Mill – Labour Quarters: The presence of empty chemical containers at the labour quarters indicates a lack of awareness or disregard for the Chemical Waste Disposal SOP.
	Smallholder Farm — Nahavio Div-Morokea VOP: The improper storage of chemicals and inadequate use of PPE by the smallholder highlights a gap in the implementation of safety practices. This may be due to a lack of training, insufficient monitoring, or poor understanding of the safety procedures by the smallholders.
Corrective Actions:	1. Mosa POM – Biogas Area:
	 Conduct training for personnel involved in chemical handling and storage on the proper procedures, emphasizing the importance of labelling and segregating hazardous materials.
	 Implement workplace inspection that includes routine checks of all chemical storage areas to verify compliance with labelling and storage requirements.
	2. Mosa Oil Mill – Labour Quarters:



	 Distribute clear, written guidelines on chemical waste disposal to all tenants and staff, emphasizing the importance of adhering to these procedures. Conduct informational sessions to ensure understanding and compliance. Smallholder Farm – Nahavio Div-Morokea VOP: Provide refresher training for smallholders on safe pesticide practices, including proper storage of chemicals and the use of PPE. Implement a program to distribute proper PPE to smallholders, ensuring they have access to the necessary protective gear for pesticide application. PPE Distribution & Monitoring System Supply of PPE: This monitoring system ensures that smallholders have access to appropriate PPE (gloves, masks, goggles, boots, overalls) either through their own purchase or provided by WNB operations. Records of PPE Distribution: A PPE log shall be maintained by Smallholders Department, showing when and what PPE was distributed to smallholders, ensuring they have the necessary
	equipment. This will also apply to all other operations that are deemed necessary or have been risk assessed to have PPE worn in the field.
Assessment Conclusion:	CAP has been reviewed and accepted. Implementation of the CAP will be reviewed during the next surveillance audit.

Non-conformity			
NCR Ref #	2535169-202408-N2	Issued Date	16/08/2024
Due Date	Next ASA	Closure Date	Open
Indicator & Category (Critical / Minor)	7.8.1 (Minor)		
Statement of Nonconformity:	Procedure on water quality monitoring as per water Management Plan was not effectively implemented.		
Requirement Reference:	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: 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. 7.8.1b Workers have adequate access to clean water. - Minor compliance -		
Objective Evidence:	Based on the water quality above the parameters. The Mosa POM	report it was observe Total co data as below:	oliform CFU reading was



	-	Parameter Total coliform, CFU	Maximum Permissible Amount < 3, if E. Coli is 0	Jan 2024 MOM (Office) 30	Apr 2024 MOM (Compound)
	sar lab Acc Sec res doc	e management has prepression reports and email poratory. cording to the procedure ction 6.1.6.3 (Monitoring sponse to such out of spounded evidence demails as stipulated in the	il correspondence e outlined in the E g and Managemer lec and health issu nonstrating that m	EI-03, WNB Water nt), additional actions. However, the	Management Plan, ons are required in re is incomplete
Corrections:	oth cor	nduct a follow-up water ner contaminants. If con mmunicate the findings all relevant employees.	tamination is conf	firmed, take imme	diate steps to
Root Cause Analysis:	tra	eak-down in communica ining of personnel respo sponse to water quality (onsible for water o	ι quality monitoring,	or a lack of timely
Corrective Actions:	and	nduct refresher training d management, that tra m initial detection to res	icks all steps take		. ,
Assessment Conclusion:		P has been reviewed an ring the next surveilland		mentation of the (CAP will be reviewed

Opport	Opportunity for Improvements		
OFI#	Description		
OFI 1	Indicator 3.7.1 Effectiveness of the training for internal auditor can be further improved to ensure good understanding		
	on internal audit procedure, auditing techniques and reporting. Training on Sexual harassment has been conducted at 01/08/2024, for Morokea Division, 09/08/2024 for Hark VOPs, Vavua VOP on 18/04/2024 and 09/08/2024 for Koimumu VOP. Policy on Sexual Harassment was available. The smallholder's awareness and understanding could be further improved		
OFI 2	Indicator 5.1.9 Grievance mechanism can be further improved by ensuring that all grievance respond responded by the Smallholders Affair Department reach the smallholders.		
OFI 3	Indicator 2.3.1 The NBPOL's Smallholder Affair Department has the geo-location information of the FFB origin for all the smallholders. Nonetheless, the accuracy of the information can be further improved.		



Positive Findings		
PF#	Description	
PF 1	Good cooperation by management team/staff/sustainability team	
PF 2	Good documentation upkeep and retrieval	
PF 3	Good housekeeping at most workplaces e.g., workshop, storage, mill operation areas, etc.	

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity				
NCR Ref #	2376409-202308-M1	Issued Date	18/08/2023	
Due Date	16/11/2023	Closure Date	17/10/2023	
Indicator & Category (Critical / Minor)	1.2.1 (Critical)			
Statement of Nonconformity:	for previous raised minor NC	Policy for ethical conduct has not been fully implemented. (Implementation of CAP for previous raised minor NC could not be justified. Furthermore, reoccurrence of same issue was observed during the assessment)		
Requirement Reference:	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others.			
Objective Evidence:	The implementation of the correction and corrective action plans to address the previously raised minor non-conformity was inadequate. Therefore, the minor non-conformity could not be closed. Previous Correction Statement			
	Accounts Department to send out fortnightly list to SHA highlighting balance of debt after growers pay is processed. SHA to keep electronic tracker and update OPIC. OPIC to inform growers so that growers are kept up to date on the progress of repayment.			
	Auditor's verification:			
	 Based on the verification done, it was confirmed that the list highlighting the balance of debt after growers pay is processed was not sent out to SHA on a fortnightly basis. Latest email correspondence was acknowledged to be dated February 2023. 			
	Previous Corrective Action Statement			
	Procurement and Finance Department to come up with SOP or flowchart to address and capture process of communicating price fluctuation for fertilizer and fertilizer delivery.			
	Auditor's verification:			
	There were no evidence of es process of communicating pri		•	



	Review of growers' consent form to include section for advising growers of the sudden price change that can occur for deduction.
	 There was no evidence of reviewed consent form being used for fertiliser deduction. The consent form being used did not include section advising growers of the sudden price change.
	2. Based on the interview with the sampled smallholders, it was identified that the deduction done by NBPOL for the sale of Fertiliser to the smallholders was not in accordance with the consent forms signed by both parties.
	Reference made to Incident/Accident/Grievance Form (reference Number: SIK 949; Date: 22/05/2023. The smallholder has raised a concern that he has provided consent for NBPOL to deduct K 1,111,10 from his sales of FFB for the purchase of 10 bags of fertiliser since 2022. The consent form was available for verification dated 14/01/2022, undersigned by the grower, OPIC and NBPOL. Deductions made to the smallholder was noted to be at K1,930.50, which exceeds the amount stated in the consent form. The grievance has been closed dated 08/06/2023, stating that the difference is due to fertiliser price changes. This was not communicated to the smallholder and no consent was obtained for the deduction of the additional amount prior to it being deducted from the smallholder.
	Due to the implementation of the CAP for previously identified minor non-conformity being unable to be closed and this being a reoccurrence of the same issue as previous minor nonconformity, it is escalated to critical non-conformity.
Corrections:	2. Revised the Growers Consent Form created 18 th August 2023 now including a section with explanation of fertilizer price fluctuation. Explanation section outlines that the price may fluctuate due to exchange rates or market price of fertilizer. In the event that the price fluctuates from the original agreed price (on the consent form), then another consent form will need to be completed and signed. Therefore, the price that the Smallholder is deducted will not differ from the final Consent Form that they sign. New Form implemented September 2023.
	Smallholder Fertilizer Sales SOP developed and socialized starting 7 th September. The SOP outlines the procedure and documentation trail that will entail sale of fertilizer to Smallholders and identifies the responsibility of internal departments involved in handling fertilizer sales to oil palm growers. It provides clear guidance on the documentation requirement and documentation flow from smallholder requisition, issuance from central stores, distribution of items and accounting.
Root Cause Analysis:	Lack of follow-up and monitoring to ensure the indicated corrective actions from last years' audit were implemented. This is due to lack of accountability and lack of communication between SHA, OPIC and Sustainability Departments.
	Since the SOP was not yet developed, the SHA staff were not aware of the requirement to inform the growers of the price change / fluctuation.
Corrective Actions:	Meetings and awareness conducted with:
	SHA, OPIC, OPRA
	SHA, Finance & Procurement / Stores Departments;



		All relevant departments Heads are aware of the content of the new SOP and the various roles and responsibilities each will have.
	2.	Awareness on the Fertilizer Sales SOP and revised Growers Consent Form covered with all personnel involved in handling Smallholder fertilizer sales under Finance, Central Stores and SHA. This also includes all SHA staff involved in communicating and dealing with Smallholder grievances.
	3.	Weekly (after Smallholder pay processed) Smallholder Fertilizer debt summary report executed.
	4.	Awareness regarding the purchasing of fertilizer, deductions and price fluctuation conducted with growers.
Assessment Conclusion:	1)	NBPOL has established procedure in the document title "Smallholder fertilizers sale procedure" which clearly stated the process for application to purchase fertilizers updated on 18th August 2023 version 01. In the SOPs clearly stated that smallholder's department need to request for quotation 1st before provide the consent form to smallholder. That will be the final fertilizers prize. Stated in the consent form, that all smallholders has rights to accept or reject the offer. Fertilizers will be sent once the consent form signed.
	2)	Sample of fertilizers purchase document sighted (quotation from the procurement, consent letter signed by smallholders). There is evidence that fertilizers prices stated in the consent form is same with quotation. Sample as per below
		 Consent form: Steven Tutmulai, SH ID;062.0109; total K757.50 Quotation: dated 12/10/2023 reservation number 102481216 total K757.50 for Urea fertilizer
		 b. Consent form: W.Kimnie, SH ID;006-2009 total K726.00 for Urea fertilizer quotation: dated 03/10/2023 reservation number102487533 total K726.00 c. Consent form: Miriam Gao SH ID 026.0157 total K578.60
	3)	Quotation: dated 16/10/2023 reservation number102485155 total K578. Meeting has been conducted between Smallholder Affair OPIC Hoskins ad PNG OPRA on 06/09/2023 and between Smallholders affair with store department/procument on 19/09/2023.
4	4)	Weekly smallholders' fertilizer sighted in the document smallholders: deduction listing by deduction time and sample has been taken for period 02/10/2023-08/10/2023 and 25/09/2023-01/10/2023.
	5)	Awareness has been conducted for grower. Sample has been taken Siki LSS on $04/10/2023$ and Saralokok on $10/10/2023$
	6)	Awareness also has been conducted through the national broadcasting corporation (NBC) radio twice a week. Recording has been verified by auditor.
	7)	Reimbursement to smallholders has been done based on analysing the smallholders that purchased fertilizers from January 2022 until August 23 with total 185 smallholders. Sample has been taken for smallholder's name Levi Bilit with total K1044.oo has been paid on 14/10/2023
	8)	Interview with 13 smallholders confirmed that that reimbursement has been paid.



	The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.
Effectiveness Closure (for previous audit closed Critical NC):	Based on interview with the sampled smallholders, consents to deduct certain percentage of their FFB sales for the payment of fertilisers taken were given to them. They also understand and aware of the monthly fluctuation of fertiliser price which affects the amount of deductions. Verification of several store issuance receipts, quotation forms, consent forms and FFB payment slips, confirmed that the deductions for fertiliser supplied by the company to the smallholders were made in accordance with the SOP for Saleable Fertilizer, ver. 1, 2023. There was no further grievance from the smallholders with regards to the deduction. Thus, based on the evidence, the NCR remains closed.

Previous Audit Critical ((Major) Non-conformity		
NCR Ref #	2376409-202308-M2	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	3.4.3 (Critical)		
Statement of Nonconformity:	Social management plan has not been properly implemented.		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. Smallholder requirements: Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable.		
Objective Evidence:			



Corrections:	Item A	
	 Appointed officer responsible for coordinating new mothers needs and the associated training and awareness has now been employed, starting end of October. 	
	Training has been conducted with Kumbango POM Management on new mother needs and requirements.	
	3. Mill Management with assistance from Sustainability Department have conducted a consultation and awareness session with the new mothers.	
	Item B	
	The 3 temporary workers at Kumbango POM have since been confirmed as permanent employees.	
Root Cause Analysis:	Item A	
	 Management was not aware of the requirement to conduct new mothers needs and ensure consultation done. This was due to the fact that there was no appointed officer to execute the training with the site Management and the identified new mothers at Kumbango POM. 	
	Item B	
	Management was not aware of the requirement that an employee cannot be employed for more than 6 months on a temporary contract. This was due to the fact that relevant training was not conducted with site Management.	
Corrective Actions:	Refresher training / briefing has been conducted with all Mill & Estate Managers on new mothers need assessments process and their rights / requirements and other requirements as per the Social Management Plan.	
	Briefing conducted to OU Managers regarding company policy on employment contracts and the terms – casual, permanent and temporary.	
	Develop and circulate clear guidelines document on temporary & permanent employment.	
	Checkroll system amended to flag temporary workers who have been working for 5 months. An error notice will appear and processing will not be allowed unless there is a change in the employment type to permanent or temporary contract ended.	
Assessment Conclusion:	CAP evidence 1	
	Training has been conducted the management of Kumbango POM related to domestic violence policy and new mother assessment needs on 02/10/2023 done by Maryanne Allan and Zaralyn Yakopa.	
	Communication of new mother assessment with assistance of sustainability department and community workers health staff on 20/07/2023 and 29/09/2023	
	3. New mother assessment records available where consultation has been done on 13/10/2023 by Dorothy Baki to new mother Fidelia Noate, mother with kids 1 year and 6 months	
	4. New mother`s need assessment report 2022-23 done by sustainability and quality management department.	



	5. Interview with the new mother confirmed that the assessment has been conducted.
	CAP evidence 2
	 Memo from human resource manager dated 18/09/2023 on "employment of "casual" & "temporary" workers sent by Billy Molowia to communicate term of permanent, casual and temporary workers. Stated in the memo that there will be no casual or temporary workers will be recruited more than 6 months and will be absorb as permanent workers if there is any vacancy.
	 Training for temporary, casual and permanent workers recruitment has been done to all Operating Units Manager on 02/10/2023. As per interview, they can demonstrate their understanding on recruitment of temporary, casual and permanent workers.
	Employment contract for newly absorb as permanent workers for 3 workers sighted and has been signed by the workers.
	4. Interview with 3 workers that has been absorbed as permanent workers.
	The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.
Effectiveness Closure (for previous audit closed Critical NC):	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.

Previous Audit Critical	(Major) Non-conformity		
NCR Ref #	2376409-202308-M3	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	3.8.6 (Critical)		
Statement of Nonconformity:	Reporting format stipulated in the company's RSPO supply chain internal audit procedure was not used		
Requirement Reference:	Internal Audit i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation.		
	Any non-conformities found a action. The outcomes of the i conformities shall be subject NBPOL maintain the internal	nternal audits and all actions to management review at lea	taken to correct non-



Objective Evidence:	NBPOL had conducted RSPO SCCS internal audits for all the five mills on various dates. However, the reporting format stipulated in their procedure was not used.	
Corrections:	MG26 has been updated to reflect auditor checklist that is now used for the internal annual SCCS audits.	
Root Cause Analysis:	SCCS Management Guideline (MG26) was reviewed by Sustainability department however the internal audit template was overlooked and not updated to reflect the newly introduced Internal Auditor template.	
Corrective Actions:	All the Sustainability team members briefed of the updated MG 26 SCCS Management Guideline	
Assessment Conclusion:	 Revision of the SOPs sighted in the document supply chain management guideline revision 14 dated August 2023 Communication of the revised SOPs sighted based on the records dated 	
	19/09/2023 The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.	
Effectiveness Closure (for previous audit closed Critical NC):	· ·	

Previous Audit Critical (ritical (Major) Non-conformity		
NCR Ref #	2376409-202308-M4	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	4.1.1 (Critical)		
Statement of Nonconformity:	Human right policy established has not been implemented.		
Requirement Reference:	A policy to respect human rights, including Prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
Objective Evidence:	NBPOL-WNB adopted human right policy which was documented in "Human right policy" dated 12/07/2023. Stated in policy the management commitment to respect, support and uphold fundamental human rights as per stated in the Universal Declaration for human rights which covers employees, suppliers, smallholders, and local communities.		
	Stated in the procedure docu 2017 clause 4.1.3, Disorder b including his/her dependent,	ehaviour and fighting at work	kplace that any employee

...making excellence a habit."



	workplace or any company premises may result in employees been suspended and further dismissal. <u>Kumbango Estate:</u>	
	A worker (referred as WA) has been dismissed following an incident where her husband assaulted an office clerk (referred to as Staff AA) within the housing compound on 05/03/2023. A statement issued on the same date, SHEQ001, alleged that the worker had provoked her husband to attack staff AA. However, there is a lack of concrete evidence supporting WA's culpability, and the investigation was conducted only three months later, specifically on 23/06/2023. Malilimi Estate:	
	An incident occurred involving a worker who was apprehended by the police for causing the death of his sister's husband. This took place as he was defending his sister (referred to as XX) from an attack by her husband within the housing compound on 03/01/2023. Within 24 hours, XX was terminated by the estate's management in order to uphold a peaceful environment on the premises. This termination occurred without any compensation, and the management also agreed that XX was not guilty.	
Corrections:	Malilimi Estate	
	Employee in question had already paid their superannuation however was not correctly paid the rest of the remainder of her fortnight wages. This has since been done.	
	Kumbango and Malilimi Estates	
	Issue a reminder to all Operating Units in WNB that managers should not decide on cases that potentially lead to termination. Rather, they should be referred immediately to HR Manager.	
Root Cause Analysis:	Lack of understanding and inaccurate implementation of the company's disciplinary policy and procedure among the managers and was not referred to HR for guidance as required for any termination.	
Corrective Actions:	1. All cases related to wrongdoing shall be referred to HR and will be investigated based on the requirements stated in WNB Disciplinary Policy & Procedure	
	The cases will be investigated by WNB Disciplinary Committee with an oversight from NBPOL Corporate HR as stated in the TORs	
	3. Amend clause 4.1.3 of the Disciplinary Policy & Procedure to incorporate disciplinary action relating to the conduct of employee's dependent.	
	Socialize the Disciplinary Policy and Procedure across all OU's in WNB both to management and workers.	
Assessment Conclusion:	Revised SOPs sighted for disciplinary policy and procedure updated on September 2023 4th revision. Revision has been made on clause 4.1.3 related disciplinary action to the conduct of employees` dependent.	
	Memo from the general manager for NBPOL- WNB, Mohamad azhazha Abdul Aziz in terminations/dismissal cases should be refer to Human Resources Department	
	3. Communication of the policy and procedure has been done to the management by human resources department on 02/10/2023 while for workers has been done on 13/10/2023 for Malilimi Estate. While for Kumbango	



	Estate, communication to staff has been done on 12/10/2023 and for workers done on 12/10/2023, 02/10/2023 and 14/10/2023.
	4. Interview with the workers on awareness of the new policy and procedure by the auditor.
	The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.
Effectiveness Closure (for previous audit closed Critical NC):	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.

Previous Audit Critical ((Major) Non-conformity		
NCR Ref #	2376409-202308-M5	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	Ineffective monitoring on compliance to legal working hours, overtime, rest periods, and employment termination.		
Requirement Reference:	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.		
Objective Evidence:	a) Stated in Employment Contract 1978 Chapter 373, clause 35 (2) terminations of contract without notice, where a party to a contract has given notice of intention to terminate under section 34, either party may, without waiting for the expiry of that notice, terminate the contract by paying to the other party a sum of equal to the amount of salary that would have accrued to the employee during the period of notice. Stated in the employment contract appendix5; termination of employment, 2 weeks' notice if employed 1 year or more and less than 5 years. Malilimi Estate One worker has been terminated in 24hours without notice due to one incident with the aim of upholding a harmonious atmosphere within the compound. Despite the worker's tenure of over 2 years with the company, no compensation has been paid. b) Stated in Employment Contract 1978 Chapter 373, clause#49(1); Maximum daily hours and rest period that subject to subsection (5) and to variation under registered award, an employee shall not be required to work more than 12 hours in any one day Numundo POM A worker has been detected working beyond the prescribed limit of overtime, totalling more than 44 hours, for 2 consecutive months. The authorization for this overtime has been formally submitted in the document OT Approval Form. Samples		



c) Stated in Employment Contract 1978 Chapter 373, clause#49(2)(b); Maximum daily hours and rest period, shall not be required to work for more than 5 hours without a meal or rest period of not less than 30 minutes of he has been allowed a rest period of at least 10 minutes during that period; and (c) shall not be required to work for more than 5 hours without a meal or rest period of not less than 40 minutes of he has not been allowed a rest period of at least 10 minutes

Numundo POM/Kapiura POM

As per interview with the sample workers, the workers informed that they have not been informed on breaking hours/rest periods. The workers mentioned that they need to work for 8 hours consecutively. Subsequent verification with the management corroborated the absence of documented break and rest hours, and no evidence could be found indicating that such information had been conveyed to the workers.

d) Inconsistent workers salary payment.

Malilimi Estate

Sample of 5 loose fruits picker has been taken and found out there is inconsistent payment for total loose fruit tonnage base on the pay slips and productivity records for PPE#20230521. Details as per below

Workers AA

Total L/F tonnage as per productivity records: 3630kgs

Total L/F tonnage as per pay slips: 3,810kgs

Different: 180kgs Garu Estate

Sample of 5 harvesters has been taken and found out there is inconsistent payment for total bunches base on the pay slips and productivity records for PPE#20230521.

Details as per below

Workers AB

Total bunches as per productivity records: 1,237 bunches

Total bunches as per pay slips: 1,051bunches

Different: 186 bunches

e) At Malilimi Estate, a worker (Emp. ID #E793) was given three days of medical leave by the Health Extension Officer i.e., 29, 30 and 31/08/2022) due to injury from work. Based on company's policy, he shall be paid for 3 days under "injury leave" term. However, based on his pay slip (PPE#20220911), he was only paid for 1 day under "sick pay" term.

Corrections:

Item A

- 1) Payment in lieu was processed on the 12/09/23. Contact has been made with previous employee and arrangements made to pass on the payment on 29/09/23.
- 2) Payment in lieu has been done for the workers base on remittance advice number 286878, total K348.26 and there is evidence that worker already collect the cheque base on photo provided and document signed. Interview unable to be done since the worker are not staying in the compound anymore.



Item B

The operation of the powerhouse operator at Mill requires certified personnel. During the audit assessment, the powerhouse station was temporarily operated by 2 certified staff and 1 probationary staff. Due to the shortage of 1 certified employee, the 2 existing certified employees were required the work additional hours. The probationary staff members have now completed their probation period on. 21.08.2023, and the powerhouse station operates with a 3-staff on 8 hour shifts.

This situation has now been resolved and the employee in question is no longer working additional overtime.

Item C

The mill management has been diligently conducting a series of briefings to inform and update the workers regarding break time and extended break time. These briefings serve as crucial opportunities for imparting essential information and ensuring that all employees are well-informed about the allocated break periods. The following is a list of briefings conducted by mill management based on the training records;

23.03.2022

25.07.2022

24.10.2022

29.01.2023

15.06.2023

10.07.2023

01.08.2023

Although extensive awareness was conducted, it does however appear as though the awareness may not have been effective. Therefore, to address this:

- 1. Standard awareness material has been developed and provided to the Mill Managers to use when conducting awareness; and
- 2. Poster created and socialised on all Mill noticeboards.

Item D

Malilimi Estate Worker

Since the employee was over-paid as a result of human error (input error), their pay will not be deducted. Refer to corrective action section for corrective action taken to prevent reoccurrence.

Garu Estate

Based on the retrieved sample's document during the audit assessment, it seems that there is a discrepancy between the estate's record and the auditor's finding. The authentic records for PPE#20230521 are listed below;

- Total bunches as per productivity records: 2037 bunches



	I =	
	- Total bunches as per pay slips: 2037 bunches - Difference: 0	
	The worker's payment was accurate and consistent, in accordance with the productivity records' bunches.	
	Item E	
	The case has been reviewed and immediate action has been taken. The underpay of 2 days of injury leave / pay with total K 59.36, has been paid PPE 27.08.2023.	
	Reimbursement of the underpaid has been done during the PPE20230827 total K59.36	
Root Cause Analysis:	1. Management is not fully aware of the terms and conditions of employment and also have not clearly communicated to workers of the T&Cs.	
	Compensation unpaid for termination – superannuation for the employee was paid accurately however the payment in lieu (2 weeks) was not paid due to Manager not aware of this requirement.	
	2. Rest period – The mill has never stopped workers and awareness conducted, however awareness appears to have been ineffective due to no standard awareness document / template for the Manager to use when conducting the awareness.	
	3. OT exceeding limit – under certain circumstances including the case referred in the objective evidence is due to unavailability of competent personnel for specific tasks due to resignations or termination and overall shortage of manpower to cover shifts. The mill had allowed workers to work more than the permissible limit.	
	Inaccurate wage calculation due to human error.	
Corrective Actions:	Issue reminder on the requirements related to employee entitlements / compensation requirements relating to termination.	
	2) Disseminate the revised OT procedure and conduct briefing to management regarding OT & working hours.	
	3) To brief Managers on internal policies on employment contracts and terms – permanent and temporary; termination, working hours.	
	4) Fortnightly review and monitoring of PPE overtime reports and corrective action taken where required.	
	5) Established documented process (step by step, flow chart) regarding fortnightly pay input / processing and the checking mechanism to check accuracy. Communicate to all responsible parties & training done with all employees involved in pay input.	
	6) The management NBOP has established procedure for salary payment which included harvesting works documented in the "estate paycheck process flow chart" and "SOP Paycheck" version 01 issuance on September 2023 signed by head of plantations. Stated in the SOPs that productivity sheet will be updated by supervisor on daily basis and will be verified by the assistant manager, pay roll clerk and manager on fortnightly basis.	



	7) Conduct OT and working hours' awareness to workers during morning musters and toolbox talks.	
	Sustainability Department to conduct monthly check of all LTI's to ensure they have accurately paid. LTI Register to be matched against SAP payment data.	
Assessment Conclusion:	Item A	
	 Payment in lieu has been done for the workers base on remittance advice number 286878, total K326.48 and there is evidence that worker already collect the cheque base on photo provided and document signed. Interview unable to be done since the worker are not staying in the compound anymore 	
	 Memo sighted dated 14/09/2023 from Human resources manager to all OU's manager related to payment of severance entitlements including payment of monies in lieu of notice. 	
	 Training records sighted for all the workers done by Julius Modbi on 02//10/2023. Sample taken for Bilomi Division, Malilimi Estate 	
	 Communication of the policy has been done by the Human resources manager, Mr Billy Madonen on 19/09/2023 to all operating units manager 	
	Item B	
	 Overtime policy and governance has been established version 01 updated on October 2023 which clearly stated that overtime is voluntarily and not exceeds 48 hours as per PNG employment act. 	
	2. Sample of pay slips taken for 5 PPE 20231008, 20230924, 20230910, 20230827 and 20230813 which there is evidence that there no workers works more than 48 hours.	
	 Communication of the policy has been done by the Human resources manager, Mr Billy Madonen on 19/09/2023 to all operating units' manager, sighted also that the procedure has been posted at the notice board for easy access. 	
	4. Communication of the overtime and resting period has been done several time after the audit and sighted that training has been done to all the workers by the operating units 16/10/2023, 11/10/2023 and 09/10/2023	
	Item C	
	 Standard awareness material has been established and prepared by Head of milling, Mr Gopinathan which clearly mentioned the rest period at works. 	
	2. Poster has been established and posted at the notice board at the office and workstation which can be easily access by all workers.	
	3. Communication of the overtime and resting period has been done several time after the audit and sighted that training has been done to all the workers by the operating units 16/10/2023, 11/10/2023 and 09/10/2023	
	Item D	
	The management NBOP has established procedure for salary payment which included harvesting works documented in the "estate paycheck process flow."	



	chart" and "SOP Paycheck" version 01 issuance on September 2023 signed by head of plantations. Stated in the SOPs that productivity sheet will be updated by supervisor on daily basis and will be verified by the assistant manager, pay roll clerk and manager on fortnightly basis.
	Communication of the SOPs to all manager/ assistant manager sighted on 19/09/2023 done by the Plantation Head, Mohamed Nasir. Interview with assistant manager demonstrate their understanding on the SOPs
	3. Communication of the SOPs done by Garu Estate by assistant manager, MR Isidor Saeke JNR to all supervisors/paycheck clerk. While for Malilimi estate, communication of the SOPs done 12/10/2023
	4. Sample of document has been taken, E796-WNB-Garu Estate Rollover form PPECODE: 20230105-Section 108- division three-wheeler where check and verification has been done by the assistant manager on 18/09/02023, 21/09/2023 and 25/09/2023.
	Verification has been done comparing to summary of payslips print out by the SAP system which tally which actual bunch recorded by supervisor. There is evidence that both documents has been check and verified by assistant manager and estate manager
	5. Interview with the workers confirmed that the SOPs has been implemented and there is no issues regards to salary payment.
	Item E
	Reimbursement of the underpaid has been done during the salary payment PPE20230827 total K59.36 and it has been verified based on payslips.
	2. Monitoring by sustainability department of LTI has been conducted for month August and September 2023. All data provided by the operating units and will be counter check with the SAP system. If there any pending payment, sustainability department will notify the operating units to proceed the payment. Sighted sample for Haella Estate and Bebere Estate which payment has been done on 17/10/2023 through petty cash. It has verified based on petty cash voucher
	3. Training how to fill up the records for lost time injury has been taken documented Injury Assessment report" which has been trained to the CHW and payclerk on 11/10/2023
	The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.
Effectiveness Closure (for previous audit closed Critical NC):	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.



Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2376409-202308-M6	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	6.5.1 (Critical)		
Statement of Nonconformity:	The Domestic Violence Policy	has not been adequately imp	olemented.
Requirement Reference:	A policy to prevent sexual implemented and communica		
	Smallholder requirements:		
	Smallholders must be able to this requirement.	verbally explain that they un	derstand and observe
Objective Evidence:	Internal policy for sexual and all other forms of harassment and violence sighted in "Domestic violence policy" dated 12/07/2023 which stated, while women who experience domestic violence, the policy applies equally to men who need advice and support. In the support of this, it is NBPOL policy that anyone who experiencing or has experience domestic violence can raise in the knowledge that NBPOL will resolve the issue of matter effect. A rape incident occurred within the Kumbango POM housing compound involving a minor (15 years old) and was perpetrated by her uncle on the 13th of August 2022. The victim's mother filed a complaint on the 19th of August 2022, and sought to verify whether the security had informed the management about the situation, which they had not. Although the matter was raised with the security department, there is no indication that any investigation has taken place. Additionally, the management has not provided any guidance or assistance to the victim, contrary to the		
Corrections:	 The Sustainability Department made contact with the victim and the victim's mother and arranged counselling sessions for the victim, providing them with the necessary moral encouragement. 		
	The counselling session took place on 28.08.2023, in collaboration with various departments such as Sustainability, Women Empowering Women (WEW), Welfare, and Safety. The victim, along with her mother and other family members, were present during the session. Follow up counselling has been offered to the victim.		
Root Cause Analysis:	No established SOP / flowchart outlining the required steps and referral pathway in dealing with sexual harassment and abuse cases. Therefore, this particular incident was not handled / managed appropriately by the relevant departments. No established SOP for Society Personner relation to timely and effective.		
	No established SOP for Security Department relating to timely and effective investigation of sexual harassment and abuse cases.		
Corrective Actions:	IOM reminder issued to all Operating Units (OU's) on the 8th September regarding the requirement for rape and sexual assault cases to be immediately		



	escalated to nominated Managers to ensure timely investigation and
	determination of disciplinary action.
	 Develop SOP that clearly outlines the required steps, referral pathways and various responsibilities in dealing with sexual harassment and abuse cases. This SOP will be a guide for all Managers and training / awareness conducted with all Managers to ensure that they are aware of the process and their responsibilities.
	3. Security Department to develop an SOP relating to the timely and effective investigation of sexual harassment and abuse incidents. The SOP outlines the responsibilities of the Security Department and the various internal and external stakeholders (e.g. Police) that must be part of the process.
	4. All sexual harassment and abuse cases must also be reported to Sustainability Department. Sustainability Department to maintain a confidential register and conduct their own internal audit / checks of all incidents, ensuring effective implementation (as outlined in the above mentioned SOP's).
	Standard awareness material on sexual harassment to be developed and circulated to all OU's.
	6. Socialize awareness material to all OU Managers.
	7. OU Manager's to conduct routine awareness with their workforce.
	Posters relating to sexual abuse and assault to be developed and distributed across the operation to enhance awareness
Assessment Conclusion:	 Consultation with the victim by women empowerment committee on 28/08/2023 and verified based on consultation minutes
	 Memo from the general manager for NBPOL- WNB, Mohamad Azhazha Abdul Aziz on handling raped cases, domestic violence and sexual assault on 07/09/2023
	 SOP for handling involving rape, sexual assault and domestic violence established on October 2023 rev 001 approved by Human Resources department.
	 SOP for handling cases volving rape, sexual assault and domestic violence for security department has been established in October 2023
	Communication of the SOPs sighted done by Human Resources management and verify based on the training records
	6. Posters has been established and posted at the notice board and accessible to all workers.
	The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable since for the current assessment, NBPOL decided to change multi mill to singe mill certification. Mosa Palm Oil Mill only received FFB from smallholders. This non-conformities is not applicable for Mosa Palm Oil Mill and smallholders.



Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2376409-202308-M7	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	6.7.1 (Critical)		
Statement of Nonconformity:	The evidence to show that the NBPOL's Operational Safe		
Requirement Reference:	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.		
Objective Evidence:	For the year 2023, the evidence to show that Rigula Estate has been conducting their OSH Committee Meeting monthly as stipulated in the NBPOL's Operational Safety Management Plan was not adequate. Only two meetings were conducted at the point of this assessment i.e., March and May 2023.		
Corrections:	The July OSH Committee meeting for Rigula Estate was held on 11/08/2023 and August OSH Committee meeting held 28/08/2023. September OSH Committee meeting is scheduled for 28/09/2023.		
Root Cause Analysis:	Lack understanding and importance given to conducting OSH Committee by the Rigula Estate Management. Lack of monitoring and tracking to ensure OSH Committee Meetings are conducted as required.		
Corrective Actions:	Issue IOM reminder to all WNB OU's regarding the requirement for documented, effective, monthly OSH Committee meetings.		
	2. Copies of meeting minutes must be submitted to Sustainability by all OU's each month for tracking on the adequacy of the issues discussed and frequency.		
	3. Refresher training to all Managers and Sustainability / ESH reps on the requirements stated on NBPOL OSMP with particular focus on OSH Committee meetings.		
	Sustainability Department to receive the 2023 meeting calendar from all OU's and central planner maintained.		
Assessment Conclusion:	Minutes meetings has been sighted where it has been conducted on 26/09/2023 and 28/08/2023 attended by representative from employer and employees.		
	2. Memo from head of sustainability, Peter Callister and general manager, Mohamed Azhazha Abdul Aziz for NBPOL dated 05/09/2023 regards to monthly OSH committee meetings and personal protective equipment.		
	 Sighted WNB OHS meeting tracker. For meeting conducted on 28/08/2023, it has been submitted on 04/09/2023 and for meeting conducted 26/09/2023, it has been submitted on 04/10/2023. Evidence of email which the OSH minutes meeting has been submitted to sustainability department. 		



	5. Meeting schedule for 2023 is available and documented in "Rigula Estate safety meeting schedule-2023". Next meeting will be conducted on 26/10/2023, 30/11/2023 and 28/12/2023.	
	6. Training for manager/OSH representative has been done by sustainability department on 09/09/2023 and 12/09/2023	
	The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.	
Effectiveness Closure (for previous audit closed Critical NC):	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.	

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2376409-202308-M8	Issued Date	18/08/2023
Due Date	16/11/2023	Closure Date	17/10/2023
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	Workers did not use appropr in Company procedures and s		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, 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:	 i) At Rigula Estate, Field No. MU RG 700, Road 5, Ave. 5, a worker was seen to be doing the FFB loading work barefooted. ii) There have been a few spots of small fire occurred at Field No. MU RG 500, Road 5, Ave. 4 to 5, Rigula Estate during the field visit. Six herbicides spraying operators were assigned to put out the fire. However, none of them were wearing appropriate PPE such as closed shoes and long pants while putting out the fire. This is not in-line with the Agricultural Fire Fighting Procedure (doc. no.: SUST-05). There was a chemical spraying operation at Malilimi Estate (Field No. MN02C, Ave. 1) done by two workers. However, it was observed that one of the workers did not go to the sanitation facility to cleanse himself after work. 		
Corrections:	Item A Safety boots have been distributed to the workers identified conducting FFB loading without boots. The estate management conducted a training session on 15/08/2023 to raise awareness among drivers and loaders. Item B		



	A firefighting training session with full personal protective equipment (PPE) was carried out by the estate management team at Avenue 4,5 midpark on 12/08/2023. A total of 6 individual sprayers participated.		
	Item C		
	Estate management organized a training session on the proper usage of the sanitation facility for all sprayers on 30/08/2023 at Mililimi office.		
Root Cause Analysis:	Lack of monitoring and enforcement of PPE by Management at Rigula and Malilimi Estates.		
Corrective Actions:	Issue IOM reminding all Managers to check and document workers PPE at musters every morning. No PPE, No Work policy MUST be enforced.		
	2. Training and awareness to be conducted with all managers' / sustainability reps & workers regarding the OSMP and PPE guidelines and requirements.		
	Sustainability to conduct ad hoc / unannounced periodic PPE checks covering all Estates.		
Assessment Conclusion:	Training for manager/OSH representative has been done by sustainability department on 09/09/2023 and 12/09/2023		
	2. Memo from head of sustainability, Peter Callister and general manager, Mohamed Azhazha Abdul Aziz for NBPOL dated 05/09/2023 regards to monthl OSH committee meetings and personal protective equipment.		
	3. Sustainability to conduct adhoc / unannounced periodic PPE checks covering all Estates which records sighted and latest has been done on 09/10/2023		
	4. Daily PPE monitoring by the estate management during morning muster call and sighted in "Daily PPE checklist" for all types of works.		
	5. Training for sprayers sighted on 10/10/2023 on sanitation after job done.		
	6. Demonstration of the fire fighting team to put out the fire.		
	7. Interview with workers on PPE and issuance of PPE.		
	The evidence of correction and corrective actions were found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment visit.		
Effectiveness Closure (for previous audit closed Critical NC):	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.		

Previous Audit Minor Non-conformity			
NCR Ref #	2376409-202308-N1	Issued Date	18/08/2023
Due Date	17/9/2023	Closure Date	Not applicable
Indicator & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	Review of SEIA (complete SEIA and Environmental Aspect Impact) was not made available and concluded with changes to current practices.		



Requirement Reference:	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every ten years to evaluate the cumulative effect of incremental changes. There shall be evidence that the review includes the participation of affected stakeholders.		
Objective Evidence:	 1) Numundo POM a) NBPOL Environmental Aspect Register, issue: 13 dated July 2023 has yet to include changes to current practice for: b) EFB stockpile at ETP area – Operating state under abnormal and emergency has not been identified in the adverse environmental aspects list. Significant environmental impacts on the GHG emission (CH4) from anaerobic process and leachate generation was not evaluated. 2) SEIA was not made available for plantations and Waraston POM and updated at least every ten years. 		
Corrections:	 Review Environmental Aspects and Impacts Register to ensure the stockpiling of EFB is captured as a negative impact with mitigation measures in place. EFB Management Plan for NOM to be developed and implemented. EFB stockpile to be removed and EFB spread to the field or moved used as composting site at the nursery. Complete SEIA for WOM – currently underway with consultant scheduled to be onsite 18th September. SEIA for WOM to be conducted September 2023 and SEIA for all Estates to be conducted Q1 2024. 		
Root Cause Analysis:	 Environmental Aspects Register failed to capture EFB stockpiling as it is not a standard practice within the company's operations. Insufficient planning, preparation and allocation of budget to ensure SEIA's were completed 		
Corrective Actions:	Include SEIA for Estates into 2024 budget and SEIA for Estates conducted Q1 2024.		
Assessment Conclusion:	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.		

Previous Audit Minor Non-conformity				
NCR Ref #	2376409-202308-N2			
Due Date	17/9/2023	Closure Date	Not applicable	
Indicator & Category (Critical / Minor)	4.2.3 (Minor)			



Statement of Nonconformity:	Complaint has not been resolved in timely manner		
Requirement Reference:	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
Objective Evidence:	Rigula Estate One complaint was lodged to the management on 16/04/2023, about a case of death caused by delayed arrival of ambulance by 4 hours. The management explained that the ambulance was stationed at Kapiura and required long travelling time for responding to emergency situations. The management's resolution involved reallocating ambulance A#427 back to Rigula Estate / Malilini Estate. However, at the point of this audit, no action has been taken, although the management had classified the issue as "resolved".		
Corrections:	Ambulance has since been back to Rigula and permanently stationed there.		
Root Cause Analysis:	Lack of communication by Rigula Management and Kapiura Group Management with the Clinic on the status of the ambulance.		
Corrective Actions:	Review of Ambulance SOP, stipulating that the Company Doctors and onsite HEO's have direct control of the ambulances. Revised SOP to be socialized amongst all Clinic staff and all OU Managers.		
Assessment Conclusion:	Not applicable since for the current assessment, NBPOL decided to change multi mill to singe mill certification. Mosa Palm Oil Mill only received FFB from smallholders. This non-conformities is not applicable for Mosa Palm Oil Mill and smallholders.		

Previous Audit Minor Non-conformity			
NCR Ref #	2376409-202308-N3	Issued Date	18/08/2023
Due Date	17/9/2023	Closure Date	Not applicable
Indicator & Category (Critical / Minor)	6.2.7 (Minor)		
Statement of Nonconformity:	Temporary workers have been used for core works.		
Requirement Reference:	Permanent, full-time employment is used for all core work performed by the unit of certification. Temporary, temporary and day labour is limited to jobs that are temporary or seasonal		
Objective Evidence:	It was found that temporary workers were used for core works. Samples are as follows: Kumbango POM 1. Worker AA, Recruited 23/01/2023, Kernel Station Operator 2. Worker BB, Recruited 23/01/2023, Oil Room Operator 3. Worker CC Recruited 23/01/2023, Effluent Pond Kapiura POM		



	1. Worker DD, Recruited 15/03/2023, Housing upkeep.
	2. Worker EE, recruited 26/06/2023, Housing upkeep
Corrections:	The 3 workers who were originally employed as temporary workers at Kumbango POM have been confirmed as permanent employees on 24.08.2023. As a result, these 3 individuals are now able to carry out the core work of the POM. However, in the case of the 2 sample workers for the Kapiura POM, their responsibilities are focused on housing upkeep, which is not considered as core work.
Root Cause Analysis:	Kumbango POM and Kapiura POM were not aware of this RSPO requirement due to lack of information being made available to them.
Corrective Actions:	 Estates and Mills to make a list of all core and non-core jobs. A procedure to be developed to as a guidance document for all Managers. Awareness to be conducted with Managers regarding the procedure. All Managers to conduct a review of all temporary employees and ensure that none are conducting core work. The review to also determine the status of workers and a permanent contract offered if the task falls under core work.
Assessment Conclusion:	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.

Previous Audit Minor N	on-conformity				
NCR Ref #	2376409-202308-N3	Issued Date	18/08/2023		
Due Date	17/9/2023	Closure Date	Not applicable		
Indicator & Category (Critical / Minor)	6.2.7 (Minor)				
Statement of Nonconformity:	Temporary workers have bee	Temporary workers have been used for core works.			
Requirement Reference:	Permanent, full-time employment is used for all core work performed by the unit of certification. Temporary, temporary and day labour is limited to jobs that are temporary or seasonal				
Objective Evidence:	It was found that temporary workers were used for core works. Samples are as follows:				
	Kumbango POM				
	1. Worker AA, Recruited 23/01/2023, Kernel Station Operator				
	2. Worker BB, Recruited 23/01/2023, Oil Room Operator				
	3. Worker CC Recruited 23/01/2023, Effluent Pond				
	Kapiura POM				
	1. Worker DD, Recruited	d 15/03/2023, Housing upkee	ep.		
	2. Worker EE, recruited	26/06/2023, Housing upkeep)		



Corrections:	The 3 workers who were originally employed as temporary workers at Kumbango POM have been confirmed as permanent employees on 24.08.2023. As a result, these 3 individuals are now able to carry out the core work of the POM. However, in the case of the 2 sample workers for the Kapiura POM, their responsibilities are focused on housing upkeep, which is not considered as core work.
Root Cause Analysis:	Kumbango POM and Kapiura POM were not aware of this RSPO requirement due to lack of information being made available to them.
Corrective Actions:	 Estates and Mills to make a list of all core and non-core jobs. A procedure to be developed to as a guidance document for all Managers. Awareness to be conducted with Managers regarding the procedure.
	All Managers to conduct a review of all temporary employees and ensure that none are conducting core work. The review to also determine the status of workers and a permanent contract offered if the task falls under core work.
Assessment Conclusion:	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.

Previous Audit Minor N	Previous Audit Minor Non-conformity				
NCR Ref #	2376409-202308-N4	2376409-202308-N4			
Due Date	17/9/2023	Closure Date	Not applicable		
Indicator & Category (Critical / Minor)	6.7.2 (Minor)				
Statement of Nonconformity:	The assigned operative trained	ed in first aid was not present	in the field.		
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of 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.				
Objective Evidence:	The assigned operatives trained in first aid were not present during the visit of the following operations: 1. harvesting at Garu Estate (field no. GR200, Ave. B) 2. manual weeding at Garu Estate (field no. GT0800, Ave. 2)				
Corrections:	All Supervisors and Section Leaders to be trained up as first aid operatives and provided with the field 'first aid bumbag'.				
Root Cause Analysis:	Insufficient number of trained first aid operatives at Garu Estate.				
Corrective Actions:	 Review the adequacy of First Aid kits and First Aid officers at all Estates. Conduct training with all designated First Aid officers. Conduct briefing to all workers on the availability of first aid kit, location and PIC's. 				



Assessment Conclusion:	This is not applicable as, for the current assessment, NBPOL has opted to switch
	from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.

Previous Audit Minor N	on-conformity					
NCR Ref #	2376409-202308-N5	2376409-202308-N5				
Due Date	17/9/2023	17/9/2023 Closure Date Not applicable				
Indicator & Category (Critical / Minor)	6.7.4 (Minor)					
Statement of Nonconformity:	The status of whether or not claim due to accident was un		insurance compensation			
Requirement Reference:	All workers are provided with Costs incurred from work-rela covered in accordance with national law does not offer pr	ated incidents leading to injur ational law or by the unit of o	y or sickness are			
Objective Evidence:	Mill on 12/10/2021 Based on the Injury classified the injury as the IAR was not avai for further process. T	3. There had been an accident to a worker (Emp. ID 6XXXX1) at Numundo Oil Mill on 12/10/2021 (but reported in the accident logbook 12/10/2022). Based on the Injury Assessment Report (IAR), the company's clinic had classified the injury as Major and requires workers compensation. However, the IAR was not available at the company's Human Resource Department for further process. Thus, the status of whether or not the worker is eligible to get insurance compensation claim due to accident was undetermined.				
Corrections:	Worker's compensation payment relating to this injury to be processed.					
Root Cause Analysis:	Management lack of understanding of the injury reporting procedure and the requirement to submit documentation for processing of Worker's Compensation					
Corrective Actions:	 Amend EOM reporting template and KPI Reporting template to include a column for worker's compensation check. Conduct refresher training with all Managers on the injury reporting procedure and flowchart. On a monthly basis, Sustainability to cross-check on reported cases entitled for worker's compensation and ensure accurate and timely processing. 					
Assessment Conclusion:	This is not applicable as, for the current assessment, NBPOL has opted to switch from multi-mill to single mill certification. Mosa Palm Oil Mill only receives FFB from smallholders, so these non-conformities do not apply to Mosa Palm Oil Mill and its smallholders.					

Previo	Previous Audit Opportunity for Improvement			
OFI#	Description			
OFI 1	OFI Statement:			
	Indicator 6.2.4			



Management plan to construct new housing to replace substandard housing and overcrowding quarters established in 15/03/2023 which 1,655 of workers housing with total PGK 374.98M has been allocated for period of 10 years.

OFI raised for auditor to verify implementation on the next audit.

Verification / Follow-up actions:

Housing inspections are conducted on quarterly basis by the management using the Housing Repair and Maintenance Checklist (PF29) to identify any defects of the house building and sanitation facility. Once identified, notification to the company's Construction Department will be made for further actions. Based on samples of the PF29, most of the repair and maintenance were done in timely manner. Sighted new housing constructed for each operating units by phase which planned to complete in 2033. Site visit done found that the new housing accommodate with 2 rooms , kitchen and toilets

1.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2232929-202207-M1	Major (Critical)	6.2.4	04/08/2022	Closed on 01/11/2022
2232929-202207-M2	Major (Critical)	7.12.4	04/08/2022	Closed on 01/11/2022
2232929-202207-M3	Major (Critical)	7.3.1	04/08/2022	Closed on 01/11/2022
2232929-202207-N1	Minor	7.3.2	04/08/2022	Closed on 18/08/2023
2232929-202207-N2	Minor	1.2.1	04/08/2022	Escalated to Critical
2232929-202207-N3	Minor	3.3.2	04/08/2022	Closed on 18/08/2023
2232929-202207-N4	Minor	2.2.2	04/08/2022	Closed on 18/08/2023
2376409-202308-M1	Major (Critical)	1.2.1	18/08/2023	Closed on 17/10/2023
2376409-202308-M2	Major (Critical)	3.4.3	18/08/2023	Closed on 17/10/2023
2376409-202308-M3	Major (Critical)	3.8.6	18/08/2023	Closed on 17/10/2023
2376409-202308-M4	Major (Critical)	4.1.1	18/08/2023	Closed on 17/10/2023
2376409-202308-M5	Major (Critical)	6.2.3	18/08/2023	Closed on 17/10/2023
2376409-202308-M6	Major (Critical)	6.5.1	18/08/2023	Closed on 17/10/2023
2376409-202308-M7	Major (Critical)	6.7.1	18/08/2023	Closed on 17/10/2023
2376409-202308-M8	Major (Critical)	6.7.3	18/08/2023	Closed on 17/10/2023
2376409-202308-N1	Minor	3.4.2	18/08/2023	Refer notes
2376409-202308-N2	Minor	4.2.3	18/08/2023	Refer notes
2376409-202308-N3	Minor	6.2.7	18/08/2023	Refer notes
2376409-202308-N4	Minor	6.7.2	18/08/2023	Refer notes
2376409-202308-N5	Minor	6.7.4	18/08/2023	Refer notes
2535169-202408-M1	Major (Critical)	3.6.1	16/08/2024	Closed on 8/11/2024
2535169-202408-M2	Major (Critical)	3.8.11	16/08/2024	Closed on 8/11/2024

...making excellence a habit."



2535169-202408-N1	Minor	3.3.2	16/08/2024	Open
2535169-202408-N2	Minor	7.8.1	16/08/2024	Open

Notes

NBPOL- West New Britain has been separated into 5 different certificate which are under Mosa Palm Oil Mill, Kumbango Palm Oil Mill, Numundo Palm Oil Mill, Kapiura Palm Oil Mill and Waraston Palm Oil Mill. Only Mosa Palm Oil Mill continued with annual surveillance audit while others restarted back to initial assessment. There is no minor non-conformities that applicable for Mosa Palm Oil Mill.

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 *Mosa 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 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)
Communities	Masalikiliki Community Planting	Face to face
Communities	Polapola Gama Community Planting	Face to face
NGO	Women Empowering Women	Face to face
Supplier	Brain Bell	Face to face
Governmental Department	Oil Palm Industry Corporation	Face to face
Internal	Mill workers	Face to face

Stakeholders comment

1 Feedback: Mill workers

The management has been accommodative to the workers in term of welfare. Safety at the workplace is a top priority imposed by the management. Adequate trainings and free PPE were among the main needs given by the management. With regards to conditions of housing facilities, water & electricity supply were always monitored to obtain the information about the status of conditions and thereafter continue maintenance. Workers were also



made to understand the mechanism to lodge complaint or grievance should there be any. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract so far.

Audit Team verification and response: No further issue.

2 Feedback: Brian Bell

The supplier has a good relationship with the company where they have been doing business for many years. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The company has always invited the supplier to attend the stakeholder meetings as a channel to discuss any issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. Business transactions are done through fair and unbiased process starting from request of price quotations. Generally, timing of invoice clearance was good with occasional hiccups which nevertheless resolved without much complication. However, no official grievance lodged by the supplier so far pertaining the clearance timing.

Audit Team verification and response: No further issue.

3 | **Feedback:** Community planting representatives (Masalikiliki and Polapola Gama)

The community planting confirmed that pricing mechanism was clearly explained to them and there has been no issue so far in term of timing of payment. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The company has always invited them to attend the stakeholder meetings as a channel to discuss any issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any.

Audit Team verification and response: No further issue.

4 | Feedback: Women Empowering Women (WEW)

The company has been very supportive in assisting WEW to meet their objective which is to maintain safe and harmonious communities which eventually helps to reduce crimes. Among the resource contributed by the company, apart from financial support are transportation, meeting facility, place to conduct their activities such as life skills and financial literacy trainings. WEW is very grateful to the company.

Audit Team verification and response: No further issue.

5 | **Feedback:** Oil Palm Industry Corporation (OPIC)

NBPOL has always been very cooperative to the agency. OPIC frequently got involve in many of the company's activities such as field training, field inspection & evaluation, replanting process, and grievance management to name a few. The company has always invited them to attend the stakeholder meetings as a channel to discuss any issues.

Audit Team verification and response: No further issue.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A	N/A	N/A	N/A	N/A	N/A

Based on comprehensive desktop studies, documentation reviews, and records reviews, there is no evidence of land ownership by other users or any customary rights associated with the land currently under oil palm operations. The Unit of Certification is in its third generation of planting, with the current landowner holding the property for over 25 years. A review of the complaint and grievance records during audits confirms that there have been no issues related to land conflict involving this Unit of Certification. Furthermore, interview records from previous and current



assessments, including those with local communities, as maintained by BSI MY, indicate that there are no ongoing or historical conflicts related to the land in question.

As a precaution, the CB maintains a mechanism to identify and consult any interested parties should any claims or rights be identified in the future. This includes keeping track of all consultations conducted during the certification cycle to ensure comprehensive coverage.

Previou	Previous land owner / user comment		
	Feedbacks:		
	Audit Team verification and response:		

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.

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Mosa Palm Oil Mill has complied with the PNG & Solomon Islands 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 Mosa Palm Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion				
Name: Mohd Razaleigh bin Mohamad	Name: Benjamin Osa				
Company Name: BSI Services Malaysia Sdn. Bhd	Company Name: New Britain Palm Oil- WNB				
Title: Client Manager	Title: Sustainability Department Manager				
Signature:	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)				
Date: 19/08/2024	Date:24/11/2024				



Appendix A: Summary of Findings

Criterio	on / Indicator	Assessment Findings	Compliance
Princip	le 1: Behave ethically and transparently		
	on 1.1: The unit of certification provides adequate information to relevant iate languages and forms to allow for effective participation in decision make	ing.	SPO Criteria, in
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. Smallholder Requirement: Organization that is managing the smallholders shall hold relevant documents and make available to interested parties on request. - Critical (Major) compliance -	Document that publicly available has been outlined in the document title "Publicly available document" which can be requested and at the discretion of the general manager. This is applicable for all operating units and smallholders. The list of documents is includes as follows 1. Land titles/User rights. 2. Operational safety management plan 3. Plan and impact assessment relating to environmental and social impacts. 4. Details of complaint and grievances 5. Continual improvement plans 6. Public summary of certification assessment report 7. Human right policy 8. Consultations and communication procedure. There is also some information that available at the website which are www.nbpol.com such as 1. Sustainability policy and procedure 2. Sustainability structure 3. Sustainability reports 4. Certification and indices 5. NBPOL foundation	Complied

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		Sample has been taken for land title for smallholders from 2 different categorize which land title and clan land use agreement (CLUA) and there is evidence that has been made available by the smallholder department. Details as per below a. Clan Land Usage Agreement (CLUA); for smallholders name Scholly Kaipu that has been signed 08/04/2016 and agreed by the clan leader, Mr John Vairu, Tony Kosi and Martin Lakiai which is under Incorporated Land Group (ILG) b. Leasing agreement for land number; 279 District of Talasea with total 6.06Ha owned by Kamias Parap and the land used for Kamis Parap.	
1.1.2	Documented Information is provided in English and accessible to relevant stakeholders. Explanatory information may be provided in writing or orally in Tok Pisin (PNG) or SI Pijin (Solomon Islands) - Minor compliance -	All the documents are available in English and accessible to all stakeholders which can be requested through Communication and Consultation Procedure and approval by heads of department. Since the last assessment, there has been no request from any stakeholders.	Complied
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	Should there be any request for information that are specified in the RSPO P&C from any stakeholders, record of request will be maintained in a few ways such as Communication Logbook, and filing of correspondence documents e.g., email printout, and letter. There has been no request for information that are specified in the RSPO P&C from any stakeholders since the last assessment.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -	Addressed in the "Communication and consultation procedure". Stated in the procedure, any communication and consultation need to be dealt by receiving department within 30 day, and 90 days' timeframe for any communication/consultation with intervention of other department. The procedure has been communicated to all stakeholders during the stakeholder's consultation which was	Complied

...making excellence a habit."

		conducted for all certification units under NBPOL-WNB certification units. Crosschecking through interview, the sampled stakeholders were able to demonstrate a good understanding of the procedure.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	NBPOL-WNB has their list of stakeholders which is updated from time to time. Generally, the stakeholders are of various categories such as local communities, surrounding landowners/premises, authorities, contractors, suppliers/vendors, and NGOs to name a few. The list has the information about nominated representatives, contact numbers, e-mail addresses and location addresses.	Complied
Criterio	on 1.2: The unit of certification commits to ethical conduct in all business of	perations and transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others. Smallholder Requirement: Organization that is managing the smallholders required to have a written policy committing to a code of ethical conduct and integrity in all operations and transactions - Minor compliance -	SD Guthrie Berhad has addressed its policy for ethical conduct in Code of Business Conduct (COBC) and to be implemented in all business operations and transaction, including recruitment and contracts. In this statement, SD Guthrie Berhad expresses its unwavering commitment to fostering good governance and transparency while adhering to the Group's Policies & Authorities and Code of Business Conduct. The Code of Business Conduct serves as a guiding document for SD Guthrie Berhad, enabling the organization to embrace the fundamental values of Integrity, Respect & Responsibility, Enterprise, and Excellence. These values serve as the guiding principles for conducting business in a fair, honest, and ethical manner. The Code of Business Conduct is applicable across all mills, estates, and the Smallholder Department within the organization.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	At the operating unit level, the system to monitor is mainly by regular checking of the contractors' legal compliance and employees' welfare by the management. Apart from that, annual internal audit, is also one of the methods to ensure whether the management is monitoring the compliance and implementation of	Complied

Principl	le 2: Operate legally and respect rights	the policy of the counterparties. Since the last assessment, there has been no report related to violation of ethical conduct. Should there be any, it will be handled according to Clause 13 of the COBC.
Criterio	on 2.1: There is compliance with all applicable local, national and ratified in	ternational laws and regulations.
2.1.1	(C) The Unit of Certification complies with legal requirements Smallholder Requirement: Smallholders are to comply with all applicable PNG or Solomon Islands legal requirements. Organization that is managing the smallholders requires to monitor compliance during extension activities. Block inspection reports to provide evidence of compliance. - Critical (Major) compliance -	The New Britain Palm Oil Limited – West New Britain (hereafter referred as NBPOL – WNB) continued to comply with legal requirements for estates and mill operation. Permit and license checked: Mosa POM 1. Department of Labour & Industrial Relations Annual Compliance Occupational health & safety on New Britain Pal Oil Limited Facilities Report 2024 inspected by Department Of Labour & Industrial Relations – Inspected on the 13 to 24/05/2024 2. Environmental permit under Section 65 of the Environmental Act 2000, permit no. EP-L2B (411) valid for 25 years until 3/4/2037. Limit of BOD for final discharge is < 100 ppm. 3. Certificate Of registration Of A Boiler Pressure Vessel #15145 valid until 22/07/2025 4. Certificate Of registration Of A Boiler Pressure Vessel #15138 valid until 22/07/2025 5. Certificate Of registration Of A Boiler Pressure Vessel #15135 valid until 22/07/2025 6. Licence To Keep A Store Where Inflammable Liquids And / Or Dangerous Goods May Be kept #24485 valid until 30/09/2025 7. List of competent persons (boiler operator) and machineries inspection certificates



Competency	Validity period/effective date
Boiler attendant license	Valid until 30/06/25
Boiler attendant license	Valid until 30/06/25
Boiler attendant license	Valid until 30/06/25
Steam Boiler 2	Valid until 30/09/24
Steam Separator	Valid until 30/09/24
Sterilizer no.4	Valid until 30/09/24

- 8. Industrial Safety, Health and Welfare Act 1961 -1969, Certificate of Registration as a Factory:
 - Electrical Workshop, cert. no. 14996 valid until 31/12/2024.
 - Water Treatment Plant, cert. no. 14993 valid until 31/12/2024.
 - Power house Mosa Mill, cert. no. 14992 valid until 31/12/2024.

Smallholders

The associated mini estates have consistently adhered to PNG's legal requirements.

The land used for oil palm cultivation is owned under the Clan Land Usage Agreement (CLUA) and Special Agricultural and Business Lease. All sampled mini estates provided documented evidence of land ownership.

		Akami Oil Palm Estate: Special Agricultural and Business Lease dated 08/04/2008, valid for 99 years.	
		The Smallholders Department conducts annual internal audits on the mini estates to monitor legal compliance. Records of these internal audit reports were available.	
		Similarly, the smallholders have also maintained compliance with PNG's legal requirements.	
		The land used for oil palm cultivation is owned under the Clan Lease Usage Agreement (CLUA), Land Settlement Scheme (LSS), or Customary Right Purchase (CRP). All sampled smallholders provided documented evidence of land ownership.	
		The Smallholders Department conducts annual internal audits on the smallholders to ensure compliance with legal requirements. Internal audit reports for all sampled smallholders were available for verification, including: • Galai LSS dated 05/03/2024	
		Kavui Division – Mai VOP dated 24/07/2024.	
2.1.2	The milling Company has a documented system for ensuring legal compliance in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors. Smallholder Requirement: Organization that is managing the smallholders shall disseminate information on legal changes to smallholders. - Minor compliance -	In 2024, NBPOL-WNB updated its Legal and Subscribed Register. The evaluation of legal requirements applicable to operations was conducted by Teup Goledu, the company secretary. The register was prepared in accordance with PNG laws and regulations, including the PNG Environmental Act 2000, PNG Environment (Water) Regulation 2002, Environmental Health Act, PNG Industrial Safety, Health and Welfare Act, Child Welfare Act 1961, Conservation Area Act 1978, Education Act 1983, Employment Regulation 1980, Forestry Act 1991, Industrial Relations Act 1962, Land Act 1996, Lands Dispute Settlement Act 1996, Land Groups Incorporation Act 2009, Land Registration Act 2009, Oil Palm Industry Corporation Act 1992, Superannuation Act 2000, and Workers' Compensation Act. Additionally, the Legal and Subscribed	Complied



		Register includes an evaluation of the company's legal compliance against the RSPO P&C – PNG & SI National Interpretation indicators. There were no updates to PNG legislation, as confirmed by the technical expert and NBPOL management. The company also submitted the required licenses, including the Annual Environment Performance Report in July 2023, as required under the Environmental Permits issued by the Conservation and Environment Protection Authority, and the OSH Integrity Inspection Report 2023 to the Department of Labour & Industrial Relations (Occupational Safety & Health). Smallholders: The SHA Department regularly disseminates information to smallholders and mini estates about legal changes during field days. Interviews with sampled smallholders and mini estates confirmed that SHA staff consistently keep them informed about legal updates and compliance requirements.	
2.1.3	For Company land, legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. For Smallholder land, boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General OR boundaries of Customary Land have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; AND there is no significant dispute over tenure. Smallholder allotment boundaries may be identified by traditional means provided that boundary locations are agree by all neighbouring parties that share common boundaries. Guidance: Significant disputes are those disputes currently before the Courts.	The land matters for the company are managed by the NBPOL-WNB Lands & Mini Estate Departments. The company operates on state lease lands and sub-lease lands. Smallholders: The rights to use the land by smallholders were evidenced through Clan Lease Usage Agreement (CLUA), Land Settlement Scheme (LSS), or Customary Right Purchase (CRP). CLUA is a government-issued document, facilitated by OPIC, granting smallholders the right to use traditionally occupied customary land for oil palm cultivation for a specified period. Clan members are prohibited from selling this land.	Complied



Smallholders requirement:

Smallholders, evidence of the "Right to use the land" will be demonstrated by compliance with the following:

- a) Land title or lease OR uncontested occupancy where
- Boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General or boundaries have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties;
- There is no significant dispute over tenure;
- Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries.
- Minor compliance -

LSS refers to a Land Settlement Scheme, where the government acquires state lease land and advertises it for smallholders interested in developing oil palm. Smallholders can apply, and upon approval, are provided with LSS agreements to occupy the land for a specified period.

CRP pertains to customary land that has been sold to a non-clan member or a member from another province with a long-standing relationship with the clan. This document is issued by a collective of clan groups.

All sampled smallholders were able to provide documented evidence of their right to use the land for oil palm cultivation, as outlined below:

- Mini Estates: The ownership of the land used for oil palm cultivation was under the Clan Land Usage Agreement (CLUA) and Special Agricultural and Business Lease. All sampled mini estates provided documented evidence of land ownership.
- Akami Oil Palm Estate: Special Agricultural and Business Lease dated 08/04/2008, valid for 99 years.
- Pavi Estate (Pavi Oil Palm Limited): Clan Lease Usage Agreement dated 16/06/2019.
- Umali Mini Estate: Clan Lease Usage Agreement dated 24/05/2015.

Smallholders: The ownership of the land used for oil palm cultivation was under Clan Lease Usage Agreement (CLUA), Land Settlement Scheme (LSS), or Customary Right Purchase (CRP). All sampled smallholders provided documented evidence of land ownership.

The documents granting ownership and the right to use the land for oil palm cultivation include registered surveyed maps clearly defining the boundaries.

		Interviews with sampled smallholders revealed that no land disputes have been reported. In cases where disputes arise, they are typically within the family and are resolved internally within the clan. This was further confirmed by the clan head and the Smallholder Department. Boundaries have been marked by constructing trenches and planting coconut or jungle trees. Interviews with smallholders and the village head confirmed that there are no boundary disputes among the smallholders.	
Criterio	on 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. Contracted parties include parties with whom a formal documented contract is in place and Smallholders where the contract is implied through the Smallholder offering fruit for sale by placing it at the pick-up point and the Company accepting the Smallholders offer by collecting it. The price to be paid and other conditions of the transaction are communicated by the Company. Each Smallholder pick-up is a separate transaction. Guidance: The Company docket issued when small-holder fruit is collected is evidence of the contract for that transaction. - Minor compliance -	Register Listing". The list is incorporated with other stakeholders such as NGOs, surrounding communities, government agencies, and schools to name a few. The list has the information about names of company, contact persons, contact numbers, and	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 all parties to the contract. Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement. - Minor compliance -	Based on several samples of contract agreements for various tasks e.g., transportation of PK and machinery provider, it is confirmed that there are specific clauses that require the contractors to comply with all relevant legal requirements. All smallholder and Mini Estates have undersigned the "Growa Stetment Fom" which contains the commitment of the growers on meeting applicable legal requirements. Records of the documents were available for all sampled smallholders and mini estates.	Complied



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. Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement. - Minor compliance -	Based on several samples of contract agreements for various tasks e.g., transportation of PK and machinery provider, it is confirmed that there is a specific clause that disallows the contractors to hire child, forced and trafficked labour. Onsite observation on FFB transport and replanting operations confirmed that no children were performing the tasks. All smallholder and Mini Estates have undersigned the "Growa Stetment Fom" which contains the commitment of disallowing child, forced and trafficked labour and where young workers are employed, they are adequately protected. Records of the documents were available for all sampled smallholders and mini estates.	Complied
Criterio	on 2.3: All FFB supplies from outside the unit of certification are from legal	sources.	
2.3.1	(C) For all directly sourced FFB, the mill requires: Company plantations, this will be Division or Sub-division, for Smallholder fruit, this will be Smallholder name, Division or Sub- division. Proof of the ownership status or the right/claim to the land by the grower/smallholder. Milling Companies in PNG and the Solomon Islands may only source fruit from their own plantations and directly from Independent Smallholders in geographic proximity that are participants in the Unit of Certification of the applicable smallholder group. - Critical (Major) compliance -	NBPOL Mosa Palm Oil Mill only received from certified smallholder that has been managed by Smallholder affair (SHA) Department. OFI The NBPOL's Smallholder Affair Department has the geo-location information of the FFB origin for all the smallholders. Nonetheless, the accuracy of the information can be further improved.	OFI
2.3.2	No fruit is to be indirectly sourced through third party traders.	There is no indirect FFB has been received since there is no collection Centre in the West New Britain. NBPOL Mosa Palm Oil Mill only received from certified smallholder that has been managed by Smallholder affair (SHA) Department.	Complied



Cuitorio	m 2.1. There is an implemented management plan that sizes to solicing law	na toum occ	omio and f	nancial vist	ailita /			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.								
3.1.1	(C) A business or management plan (minimum three years) is documented by the Milling Company that includes the projected contribution of fruit supplied by Smallholders that are within the Unit of Certification. - Critical (Major) compliance -	periodically the strateg provides b optimize t information expenditure	NBPOL WNB has established a Business Plan from 2023 to 2027 and periodically reviewed on the progress. This business plan provides the strategic roadmap for the CU to achieve long term goals. It also provides business direction and plan for the management to optimize the operation and improve efficiency. Among the information available in the Business Plan is operational expenditures, CAPEX, projected yield (including from smallholders), projected CPO & PKO price, and sales					Complied
		Mosa Palm where the		•			mallholders	
3.1.2	The Milling Companies develop an annual replanting programme for Company plantations projected for a minimum of five years with yearly review.	Mosa Palm Oil Mill only received FFB from certified smallholders that managed by Smallholders affairs department (SHA). Replanting program has been outline in the smallholders requirement below.					Complied	
	Smallholder requirements:	<u>Smallholders</u>						
	Organization that is managing the smallholders develop replanting program for smallholders. - Minor compliance -	The Smallholders Replanting Program has been established and documented in the NBPOL WNB Smallholder 5-Year Replanting Program. The NBPOL WNB Smallholder Affairs Department manages these replanting programs. The decision to replant is entirely up to the smallholders. Once they decide to proceed with replanting, they notify the SHA Department, which then conducts a Replanting Inspection. Upon approval based on the inspection results, seedlings are provided to the smallholders for planting.						
		Records were available as below:						
		Year	2024	2025	2026	2027	2028	
		На	1000	1000	1000	1000	1000	

3.1.3	The Milling Company holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. - Minor compliance -	Management review has been conducted on 02/08/2024 attended by all head of department and has been chaired by NBPOL West New Britain General Manager. Issues that has been discussed is finding from internal and external audit, mill and estates performance, highlighting issues and etc,	Complied
	on 3.2: The unit of Certification regularly monitors and reviews their economic demonstrable Continuous improvement in key operations.	nic, social and environmental performance and develops and implemen	nts action plans
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	Continuous improvement plan (CIP) has been established for all operating units under Mosa Palm Oill documented in Action Plan for continual improvement in sustainable performance 2014-2025 revision in August'2024. Sample of action plan established. 1. Effluent pond management to reduce BOD below <90ppm at exit of last pond. 2. No spraying and no fertilizers applications on buffer zone. 3. To ensure sufficient retention time for biochemical reaction. 4. To initiate mechanization in order to improve the workers income. 5. Established 300msq of suitable garden area per housing area for vegetable plantings. 6. All compound has sufficient of housing to provide 1 room per employee. 7. Reduce emission through establishment of methane capture.	Complied
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	RSPO metric template version 2.1 is used for the reporting of NBPOL Mosa Palm Oil Mill Certification Unit's metrics (economic, social and environment). Data reporting period is January to	Complied



	- Minor Compliance -	December 2023 for (social and environment metrics) and economic metrics from Jul 2023 – Jun 2024 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.	
Criteri	on 3.3: Operating procedures are Appropriately documented, consistently im	plemented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. Smallholder requirements: Organization that is managing the smallholders provides relevant SOP of smallholding operations to smallholders Critical (Major) compliance -	NBPOL WNB has established Standard Operating Procedure as guidance for the palm oil mill daily operations. The SOP was documented in Standard Operating Procedures Listing Summary – 2024. Among the sections covered in the SOP are as follows: Milling – General (covering all the mills) Engineering – General Milling – Workshops Transport Heavy Equipment Workshop Clinic Plantations – General Agronomy Tractors Sustainability Smallholder Affairs Management Guidelines Environment Management Plans Lands & Mini Estate Department Safety and Health procedure has been established in Operational Safety Management Plan for Planation and Production Department. Among the sections covered in the SOP are as follows: Section 1: Occupational Health and Safety Policy Section 2: OH&S Committee Member Procedure Section 3: OHS Responsibility and Communication Section 4: Risk Assessments	Complied

		 Section 5: Accident and Emergency Response Section 6: Lost Time Injury Reporting and Recording Section 7. Initial Reporting Requirements for Incidents (INR) Section 8: Fatality and Permanent Disability Reporting and Recording Section 9: Major Incident Flow Chart Section 10: Workers Compensation Claims Section 11: Health and Safety Procedures - Plantations / Production Section 12: Health and Safety Procedures- General 	
		Standard operating procedure for smallholders with has been established by smallholder affairs department (SHA) with collaborations of Oil Palm Industry Corporations (OPIC) to ensure better managing for smallholders. SOPs that available as follows;	
		 SOP E-Tag SOP Sanitation and removal of Ganoderma Infected Palms SOP- Sexavae Operations SOP- Discrepancy cand grievances. SOP- Saleable Fertilizers SOP- Smallholder Affairs- Auditing SOP- Plantations Talls Palm Harvesting Near Power Lines SOP- Weighbridge 	
3.3.2	A mechanism to check consistent implementation of procedures is in place. Smallholder requirements:	Apart from daily routine supervision, the sampled management units have their mechanism to monitor the implementation of their	Non- compliance



Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.

- Minor Compliance -

procedures, among others through Internal Audit, Performance Monitoring Procedure, Procedure for Contractor Monitoring, and workplace inspections to name a few. Visit reports were made available for verification at all the sampled operating units.

Smallholders

FFB production for smallholders can be sighted in the document "Smallholder: FFB production summary (by block) which automatically generated from the system that has been established where smallholders, driver need to scan the e-tag at smallholders' fields and at the Mill weighbridge. All the information can be extracted from the systems call e-Plasma. Other information available is the smallholders income, deduction, tools issuance and smallholders history.

Minor Non-conformities

Mosa POM

- During site visit Biogas Area, it was found that 3 containers contained with petrol and Lubricant was not labelled and has been stored together with store for paint without any warning signage.
 - It was not in line with SOP Chemical Storage and Handling dated 20/06/2022 stated in Section 2 "The area should have adequate signage for hazardous substances with each chemical storage labelled".
- Based on site visit at Mosa Oil Mill labour quarters, house no. DLQ7A, there were two units of 20 lt empty jerry cans

		<u>, </u>	-
		(based on the label, used to contain sulphuric acid) found to be placed outside the bathroom by the tenant.	
		This is not in-line with the company's Chemical Waste Disposal SOP, which reads "DO NOT take Empty Chemical Containers (H ₂ SO ₄ , HCL, Isopropanol, Teepol, hexane & petroleum ether containers) out of the Mill without Mill Management's approval.	
		Smallholders	
		During site visit at Smallholder Farm Nahavio Div-Morokea VOP (016-0375) Anton Yamba, it was found out that Chemical Brand Name; Tarang, Active Ingredient, <i>Glufosinate</i> Container with Lubricant and Petrol (Without label) was placed directly on the ground in the storage area. Based on interview and verification, the spraying conducted by smallholders' husband, the PPE used was only surgical mask. It was not in line with Procedure Pesticide Practices Smallholders Affairs Management Guideline May 2017 Section 2.11 Pesticide storage and 2.12 Safety.	
3.3.3	Records of monitoring and any actions taken are maintained and available Minor Compliance -	Records of monitoring including any action taken are maintained and available. Among the records verified are:	Complied
		- E-SHEQ001 Incident Form, ver. 3, rev. 06/2015	
		- Estate Structured Crop Recovery Assessment Reports	
		- ESH Monthly Inspection Checklist-Engineering Specific for Oil Mill	
		- Internal audit reports	



Critoria	on 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA	 Daily PPE checklists for various workstations Wastes disposal records RTE species monitoring Plantation Boundary Monitoring Checklist 	d anvironmental
	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	The Social and Environmental Impact Assessment (SEIA) report was conducted by David Konge Amos, a freelance environmental	Complied
	stakeholders and including the impacts of any smallholder/outgrower scheme, is documented. Guidance: SEIA will be undertaken where: a) It is required by law; or b) The certified operation meets any of these thresholds: 1. Land conversion exceeding 500 hectares; 2. Additional water withdrawal exceeding 500,000 cubic meters per year for irrigation or processing; or 3. Additional industrial wastewater discharge exceeding 10,000 cubic meters per year. The SEIA may be comprised of separate documents being a Social Impact Assessment and an Environmental Impact Assessment provided there is collaboration in the production of the documents to ensure coordination. - Critical (Major) compliance -	consultant. The report, dated June 2021, was made available for verification. The assessment methodology included desktop reviews for regulatory and characterization issues, community meetings, stakeholder interviews, household surveys, and field inspection visits. The SEIA for other operating units was also verified as follows: • Operating Unit: Mosa POM • Date of Assessment: January 2023 Additionally, an Environmental Impact Assessment (EIA) was carried out by the NBPOL Sustainability Department for estate and mill operations. The latest review, Revision 13, was completed in July 2023. The EIA register covers various aspects, including: • Milling operations • Refinery • Construction • Smallholders • Transport/workshop • Plantations • Cattle operations	

		Kimbe Bulking Terminal	
		BiogasNursery	
		Office	
		Central stores/CES Cond By destrict Units	
		Seed Production UnitSustainability	
		Roadworks	
		The EIA report also addresses abnormal and emergency situations, covering both adverse and beneficial environmental aspects.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every ten years to evaluate the cumulative effect of incremental changes. There shall be evidence that the review includes the participation of affected stakeholders. Smallholder requirements: Improvements suggested at the pre-planting inspection should be noted on the inspection form. - Minor Compliance -	The latest review of the Environmental Aspect Registry was conducted by the NBPOL Sustainability Department in July 2023. The Beneficial and Adverse Impact Register documents both significant impact activities. Control measures for all significant aspects are included in the register, while management plans to minimize impacts are detailed in the following documents: • Environmental Instruction: Water and Natural Resource Management Plan, EI-03, Rev: 09, dated 13/06/2021 • Environmental Instruction, EI-02, Rev: 11, dated 01/07/2021 • NBPOL-WNB Continuous Improvement Plan 2014-2025 Smallholders: The Smallholder Affairs Department conducts Pre-Planting Inspections at smallholder plots selected for replanting. A Planting Approval Form — Replant is issued, where Smallholder Affairs officers assess various factors such as land ownership, topography, buffer zones, clearing of the blocks, grower and planting history, and necessary improvements before replanting. The Planting Approval Form — Replant was available for verification. Notable	Complied

		improvements include the establishment of buffer zones, Re-GPS, poisoning of voluntary palms before replanting, and areas excluded from replanting due to steep slopes.	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. Smallholder requirements: Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable. - Critical (Major) compliance -	NBPOL WNB has integrated its Environmental Management Plan into the NBPOL WNB Continuous Improvement Plan 2014-2025, with the most recent review conducted in August 2024. The plan identifies impacts that require changes in current practices to mitigate negative effects and includes a timetable for implementing these changes. The management plan is reviewed annually, and progress is monitored through quarterly internal audits. On-site verification confirmed that progress is on track.	Complied
		Smallholders: Internal audits are conducted annually for each smallholder within the certification unit by the Smallholders Affairs Department. After each audit, a Quality Improvement Plan (QIP) is issued on-site. Smallholders are given 12 days to implement the recommended improvements, after which they are revisited to verify compliance. Notable improvements include increased awareness of the zero burning policy, waste management, SOP on E-Tag, child labor policy, grievance procedures, and Best Management Practices (BMPs). The findings of the block inspection mainly on maintenance of buffer zone, to set up signboard and monitoring on spraying at buffer zone. Other than that, the filed inspection also focusing on waste disposal mainly on organic waste and domestic waste. GAP issues also has been highlighted in the field inspection.	

3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. - Minor Compliance -	The Human Resource Department of NBPOL-WNB is guided by the "Standard Operating Procedure Recruitment & Selection". The procedure describes the steps for recruitment and selection which initiate from requisition management, sourcing and job posting, screening and selection, job offer, onboarding, reporting, and tracking. It is also stated that all selected applicants will be accessed for several criteria which are qualification, relevant experience, competencies, and personal qualities /attributes. The procedure was made available to the workers and their representatives where the procedure has been listed as publicly available document.	Complied
		In other document called "Disciplinary Policy and Procedure", the process of terminations is described. Types of behaviours are classified into 3 which are poor behaviour, unacceptable, misconduct and gross miss conduct. The details of action to be taken based on the types of behaviour were also defined.	
3.5.2	Employment procedures are implemented, and records are maintained Minor Compliance -	Based on the recruitment process of the sampled employees, the procedure was found to be satisfactorily implemented. Among the records of implementation maintained were employment letter (which includes the terms and conditions), and medical check-up report.	Complied
Criterio	on 3.6: An occupational health and safety (H&S) plan is documented, effective	vely communicated and implemented.	
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. Smallholder requirements: Organization managing the smallholders to provide advice and training on identification and control of risks through extension activities. - Critical (Major) compliance -	Mosa Palm Oil Mill Verified that all operations has been risk assessed and the assessment has been documented in the document "Mosa Oil Mill Safety Register 2024". Outline in the same document that the management for each risk identified and procedure that has been established. For each operations, the management has established SOPs.	Non- compliance



Sample has been taken for ramp operations which the management has established SOPs Traffic Control, SOPs for Ramp and SOPs for FFB Grading. The management also has plan to conduct awareness on SOPs for Traffic Control to all the drivers, crew, securities to comply with the SOPs established. Communication on the procedure to the transport department and estate management has done through email and reminders to communicate to all the drivers. Transport department has done the training which can be sighted on 20/05/2024 and 24/06/2024.

While for nut and kernel recovery plants, the management has plans to identify point of hazard and as discussed during the toolbox.

Other than that, the management will conducted workplace inspection compliance of the SOPs on monthly basis.

Smallholder

The SHA Department has assessed all risks associated with the operations of smallholders and mini estates. Based on these risk assessments, the SHA conducts regular training sessions and field days to promote safety awareness among smallholders, mini estate management, and workers. Documentation of Safety and Hygiene Trainings is available for verification.

Major Non-conformities

Internal Audit has been conducted on 25/05/2024 however there is some matters yet to be advice as per site visit at Akami Estate. Evidence was sighted as below:

1) Chemical Storage Area: Soap was not available, which is not in line with the Safety Data Sheet (SDS) for

		Glyphosate, which requires washing with plenty of water	
		and soap in the event of contact.	
		2) Office Compound: No First Aid Box/First Aid Kit was	
		found in the office compound, including in the office,	
		mixing area, tools area, manager's house, tools store, and general store.	
		This is not in line with the Operational Safety	
		Management Plan - Smallholders, dated July 2023,	
		Section 5.2 on First Aid.	
		2) Field C. First Aid box was available with a decignated first	
		3) Field C: First Aid box was available with a designated first aider, however, the box contained no listed items, and	
		two items (sterile water) had expired in 2020.	
		4) Tools Store: Safety Data Sheet (SDS) for Petrol and	
		lubricants was not available in case of emergency	
		purposes.	
		Auditor reference and verification were based on the "Operational	
		Safety Management Plan for Smallholders", July 2023, Issue 8,	
		and the Smallholder Internal Audit QIP Form dated 25/05/2024.	
		Further verification through interview with the estate owner, he unable to demonstrate his understanding on the management	
		plan established.	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks		Complied
	to people is monitored.	Effectiveness on implementation of the OSH management plan has	•
	- Critical (Major) compliance -	been monitored though workplace inspection that has been	

		conducted on monthly basis. Sample has been taken for month May and June 2024 that has been conducted on 31/05/2024 and 28/06/2024 by Mr Elton John and the report has been made available in the document OH&S Monthly Inspection checklist- Mill Specific. Other than that, toolbox meeting has been conducted daily to discuss any safety issues and disseminate information on safety. Sample has been taken for toolbox conducted on 25/07/2024, 18/08/2024 and 20/10/2023. Safety issues has been monitored though monthly safety meeting that has been attended by the safety committee. The main objective is to discuss issues raise during the workplace inspection, safety issues raised and other point of concern. Department OH&S committee minutes conducted in 03/05/2024 chaired by Mr Gopinathan Minutes meeting for site OH&S committee meeting sighted to discuss issues related to health, safety and welfare that has been	
		conducted on monthly basis. Sample has been taken for meeting 29/07/2024, 26/06/2024 and 31/05/2024	
Criterio	n 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract we	orkers are appropriately trained.	
3.7.1	(C) A documented programme that provides training is in place, which is accessible to those who will be affected by the programme, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. Smallholder requirements: Organization managing the smallholders to provide advice and ongoing support to Smallholders through field days and visits to Smallholder blocks. - Major Compliance -	Mosa Palm Oil Mill Training plan for Mosa Palm Oil Mill has been established in the internal training schedule which cover for entire 2024. The training plan included training for SOPs, ERP, Safety. Supervisor training, and other training related to the operations. Sample of training that has been plan in November and December'24 are Emergency Drills- Fights and accidents, Safety at height, Mill lubrications and safety management and Chemical Application for Boiler stations. Smallholders	OFI
	ma	ıking excellence a habit. [™]	

	<u></u>		
		The SHA Department, in collaboration with OPIC and OPRA, conducts regular field days at all smallholder projects to provide advice and training. Pop-Up Booths are set up at these field days to allow smallholders to access information that is beneficial to them. The SHA Department provides advice and support on various topics, including Best Management Practices (BMPs), Pest and Disease (P&D) Management, E-Tag Procedures, Grievance Channels, FFB Pricing Formulas, and Health & Hygiene.	
		As per interview with the sample smallholders, there is evidence that the filed days conducted is effectively and smallholders are able to demonstrate their understanding on the communication and briefing given. It also has been further confir	
		1. Effectiveness of the training for internal auditor can be	
		further improved to ensure good understanding on internal audit procedure, auditing techniques and reporting.	
		2. Training on Sexual harassment has been conducted at 01/08/2024, for Morokea Division, 09/08/2024 for Hark VOPs, Vavua VOP on 18/04/2024 and 09/08/2024 for Koimumu VOP. Policy on Sexual Harassment was available. The smallholder's awareness and understanding could be further improved	
3.7.2	Records of training are maintained, where appropriate on an individual basis. Appropriate records include records of training or evidence of competency for trade qualifications, boiler operation and other safety related activities such as chemical handling	Mosa Palm Oil Mill Training records has been maintained by the management of Mosa Palm Oil Mill and sample has been taken as per below.	Complied
	Smallholder requirements:	 Safety briefing conducted on 25/07/2024. Boiler Turbine Refresher training on 24/06/2024 	



	Smallholder training records are maintained.	3. RSPO Disciplinary Policy on 20/02/2024	
	- Minor Compliance -	4. Oil spill drill conducted on 07/04/2024.	
		5. Grievance& request procedure on 08/08/2024	
		6. Sexual harassment procedure and management on	
		09/10/2023	
		Smallholders	
		Training records for the sampled operating units were well maintained and available for verification. The records included	
		details such as the title of the training, the date it was conducted,	
		the names of trainers, the names of participants, and participant	
		signatures. The training generally covered topics related to	
		Occupational Health and Safety (OHS), standard operating	
		procedures, environmental practices, company policies, violence	
		and sexual harassment, and complaints/grievance procedures	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard	Training for supply chain conducted on 16/07/2024 by Zaralyn Zakopa with attendance of person in charge and staff that related	Complied
	(SCCS). Training is specific and relevant to the task(s) performed.	to supply chain requirement.	
	- Minor Compliance -		
Criterio	on 3.8: Supply chain requirement for mills		
(note: a	Il supply chain requirements are considered as Critical (C) . However it will r	ot contribute to suspension if there is more than 5 non-compliance wi	thin a principle)
3.8.1	Identity Preserved Module	Mosa Palm Oil Mill only received FFB from certified smallholders	Complied
	A mill is deemed to be Identity Preserved (IP) if the FFB processed by the	that managed by smallholder affair department (SHA) NBPOL. The	
	mill are sourced from plantations/estates that are certified against the	management for Mosa Palm Oil Mill opted "Supply Chain Management Guideline" revision no;15.01 revision 2024 by	
	RSPO Principles and Criteria (RSPO P&C), or against the Group Certification	sustainability department and approved by Mr Mohamed Azhaza	
	scheme.	Abdul Aziz.	
	Certification for CPO mills is necessary to verify the volumes and sources		
	of certified FFB entering the mill, the implementation of any processing		
		1	

	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.		
3.8.2	Mass Balance Module 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.	Not Applicable (NA) as the mills opted for IP.	Not Applicable
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Mosa Palm Oil Mill have met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace. Company has registered in PalmTrace system as follows: Mosa Mill Members ID: RSPO_PO1000000020 License valid until 09/09/2024	Complied

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	T	T	
3.8.5	Documented procedures a. The mill shall have written procedures and/or work instructions or	a) The management adopt procedure documented Supply chain management guideline (MG26) revision 15/01/2024.	Complied
	equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	 The procedure covers all the requirement in the supply chain such as role and responsibilities, purchasing good in, sale goods out and outsourcing activities. 	
	b. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	c) Among the essential records maintained by the mills are the transaction documents of FFB reception, production	
	c. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	and delivery of CPO and PK, mass balance accounts that show the volume received and dispatched. Apart from that, training records were also well maintained.	
	 d. 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. e. The mill shall have documented procedures for receiving and 		
	processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	e) Stated in the procedure clause;7 purchasing and good in. that the mill only received FFB from certified locations within the units of certifications	
3.8.6	Internal Audit	Internal audit procedure has been revised on July 2024,	Complied
	i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:	version#06 document number; SUST-001- Internal auditing has been approved by the sustainability manager, West New Britain.	
	a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Other than that, the management adopt procedure documented Supply chain management guideline (MG26) revision 15/01/2024. Stated in the guideline clause#16 internal stated that the format that need to be utilized by the lad auditor.	
	b. Effectively implements and maintains the standard requirements within its organisation.	Internal audit has been conducted on 17/07/2024 and sighted in the document NBPOL-IA Mill Report_00131/MOM & Lab/ Zaralyn	
	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	Yakopa/ 17/07/2024. Total 1 Major and 3 OFI has been raised and the audit has been conducted through I-auditor which started to	

...making excellence a habit."



	taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.	be utilized end of 2023. The Major Non-conformities raised under indicator 3.8.10 where the list of CSPO and CSPK transporter is not available. Corrective action has been established where the list of contractors has been updated and awareness training has been conducted by the management to person in charge.	
3.8.7	Purchasing and Goods In i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.	 i. Mosa Palm Oil Mill only received FFB from certified resources which is from the smallholders that has been certified. The management monitor the FFB received based on the FFB tickets and FFB crop summary which will be finalized in the end of the months. Sample has been taken for 10 smallholders for month June'24, March '24 and December'23. There is no un-certified smallholder in West New Britain which all smallholders registered under Smallholder Affair (SHA) Department, NBPOL and FFB evacuation and transport will be done by NBPOL transport department and e-tag will be used to scan at the truck weighing system which contained information of the smallholders. ii. There is no overproduction has been identified where it has been verified from the FFB crop summary for period August'23 until July'24 iii. Stated in the MG26 Guideline in clause; 15, nonconforming products and/pr document that non- 	Complied
		conforming product will be be allowed into the mill. These product will be isolated until further decision by the management.	
3.8.8	Sales and Goods Out	As per interview, there are 2 types of CSPO buyer which are Kumbango Refineries or outside the West New Britain area and will	Complied



	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): i. The name and address of the buyer; ii. The name and address of the seller; iii. The loading or shipment / delivery date; iv. The date on which the documents were issued; v. RSPO certificate number; vi. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); vii. The quantity of the products delivered; viii. Any related transport documentation; ix. A unique identification number.	be transported to Kimbe Bulking Terminal (KBT) and any purchasing will be arranged by shipping department. While CSPK, PK will be sent to Kumbango KCP Sample of weighbridge tickets Buyer: Kumbango Refineries Date: 07/07/2024 RSPO certificate No: RSPO 728122 Product description: CSPO IP Quantity: 27.52mt Ticket no: 022147 Contract No: S/NBM/0724/CPO00006	
3.8.9	 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: 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 	Mosa Palm Oil Mill outsources activities for transporting CSPO and CSPK to refinery and bulking terminal with there is no changes of ownerships. Contract agreement sighted as per below Labour and contract services agreement contract no: 2024-01 dated 05/01/2024 for CSPK transport to Kumbango Oil Mill between New Britain Palm Oil Limited and HSK Ltd. Labour and contract services agreement contract no: 2024-01 dated 08/07/2024 for CSPO transport to Kumbango refinery between New Britain Palm Oil Limited and Abaca Heavy Equipment Ltd.	Complied

	agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.	Sighted addendum of contract in the document contractor compliance with RSPO requirement dated 05/08/2024 that contractors agreed that NBPOL and NBPOL's nominated certification body (CB) has access to the contractor or operation of an audit deemed necessary. System has been established through NBPOL contractors/services provider monitoring form which has been communicated to the contractor during the induction process, for HSK Ltd on 08/08/2024	
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.	There is only contractors which physical handling the RSPO certified product which are Abaca Heavy Equipment LTD for CSPO transporters and HSK LTD for CSPK transport Details of the contractor has been outlining the document contractors listing document number M806-F50-contractor listing	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.	There are 2 contractors which physical handling the RSPO certified product which are Abaca Heavy Equipment LTD for CSPO transporters appointed on 08/07/2024 and HSK LTD for CSPK transport appointed on 05/01/2024. It has been verified base on the contract agreement Labour and contract services agreement contract no: 2024-01 for CSPK transport to Kumbango Oil Mill between New Britain Palm Oil Limited and HSK Ltd and Labour and contract services agreement contract no: 2024-01 for CSPO transport to Kumbango refinery between New Britain Palm Oil Limited and Abaca Heavy Equipment Ltd. However, there is no notification has made to the CB on the new	Non- compliance



		appointment on contractor prior to the audit.	
3.8.12	 i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv. For Mass Balance Module, the mill: a. Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. 	Mosa POM maintains Daily and Monthly Production Summary Reports. These reports include data on crops received, production metrics (such as milling hours, ton/hour, oil production, oil extraction, kernel production, kernel extraction rate), CPO (Crude Palm Oil) and PK (Palm Kernel) stocks and dispatches, oil and kernel quality, process data, as well as oil and kernel losses. The production summary reports ensure a balance between received FFBs (Fresh Fruit Bunches) and the delivery of CPO and PK. The quantities of CPO and PK available in the mill are recorded and monitored in real-time using Storage Tank Records and Kernels Stock & Dispatch record Excel sheets. According to MG-26 SCC Revision 13, dated July 2021, the minimum retention time for all documentation is 3 years. Generally, all documents are stored for 5 years.	Complied
3.8.13	Extraction Rate 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	Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER	Complied

	extraction rates based upon past experience, documented and applied it consistently.	mentioned in Table 10 are in line with the mill's previous performance.	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Daily Mill Production Report (DMRP) shows that extraction rates updated and based on CPO and PK actual performance.	Complied
3.8.15	Processing 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.	Mosa POM does not receive any FFB from uncertified supply base, therefore all CPO and PK produced are 100% certified.	Complied
3.8.16	 Registration of Transactions 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. 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. 	The monthly stock records for PK and CPO volumes transferred to the refinery or crusher plant were reviewed. The records indicate that closing stocks at the refinery or crusher are well balanced, and products are not stored for more than 3 months. Final products are shipped by the refinery or crusher no later than the 2nd month after receipt from the mills. Shipping announcements for the mills are made accordingly. PalmTrace transaction records were verified, and the announcements were made promptly in line with established procedures. The PalmTrace system confirms that all volumes sold under conventional methods were correctly removed.	Complied
3.8.17	Claims 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.	As a subsidiary of SD Guthrie Berhad, NBPOL has informed its stakeholders about its RSPO Certification through its website. However, no trademark logo is used by the certification unit. The description provided does not suggest that NBPOL's membership in RSPO implies that the company produces RSPO-certified palm oil products. There is no communication about NBPOL's RSPO membership beyond business-to-business claims. The RSPO certificate number and product details are accurately stated in the CPO and PK delivery documents.	Complied

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Genera	al 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.	SD Guthrie Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.	Complied
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of 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	SD Guthrie Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The website had not displayed the RSPO website and had not display any RSPO Trademark.	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.	No evidence of RSPO corporate logo used by Bukit Benut POM and verified through document and site review (notice board, business card, shipping documentation, etc.	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.	The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	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: • "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)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil."	In the SD Guthrie Berhad (Formerly known as Sime Darby Plantation's) (SDP) 2021 Sustainability Report (https://simedarbyplantation.com/wp-content/uploads/2022/04/SDP-SR-2021 20220429.pdf), SD Guthrie that the management has made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools which complied with the requirement of RSPO Market Communication and Claims 2020.	Complied

...making excellence a habit."

4.6	 "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." RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following: 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. B. Claim statements are limited to the following examples: 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. 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". 	The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	Complied
5.1 Ge			
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,	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and	Complied

	displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 2021 Sustainability Report (https://simedarbyplantation.com/wp-content/uploads/2022/04/SDP-SR-2021 20220429.pdf).	
5.1.2	Product-specific communications are voluntary.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the Product-specific communications are made voluntary by the management.	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.	 Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label. Consequently, further assessment of this requirement cannot be conducted. 	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.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no usage of any other trademark or label by the management.	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 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 • 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.	As Mosa Palm Oil Mill is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable

5.1.6	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. Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or	As Mosa Palm Oil Mill is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not	Not Applicable
	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	applicable to this UoC.	
5.2 Off	pack claims		
5.2.1	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.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 2021 Sustainability Report (https://simedarbyplantation.com/wp-content/uploads/2022/04/SDP-SR-2021 20220429.pdf).	Complied
5.2.2	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.	Based on the documentation review and interviews with relevant personnel, it has been confirmed that when confirming the sale of certified palm oil products, Bukit Benut Oil Mill has adhered to the	Complied



		requirements of the RSPO Supply Chain Certification Standard (SCCS). Samples as below: CPO - IP Buyer: Kumbango Refineries Date: 07/07/2024 RSPO certificate No: RSPO 728122 Product description: CSPO IP Quantity: 27.52mt Ticket no: 022147 Contract No: S/NBM/0724/CPO00006	
5.2.3	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: • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.	As Mosa Palm Oil Mill is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC. There is no distributor or wholesaler involves.	Not Applicable
5.3 On	pack claims		
5.3.1	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	Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024	Complied

	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.	 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted. 	
5.3.2	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: A) For Identity Preserved (IP)/ Segregated (SG) Certified Products: RSPO IP/SG CERTIFIED* Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* *Add RSPO TM Licence Number below or next to the claim.	 Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted. 	Complied
	 B) or Mass Balance (MB) Certified Products: RSPO MIXED* Contributes to the production of RSPO certified palm oil* Contains RSPO certified palm oil (MB)* *Add RSPO TM Licence Number below or next to the claim. 	 Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted. 	Complied
	C) For Partially Certified Products: • RSPO 50% MIXED*	Details of RSPO Trademark License of SD Guthrie Berhad as below:	Complied

	Contains at least 50% RSPO certified palm oil* *Add RSPO TM Licence Number below or next to the claim.	 License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted. 	
	D) For Products covered with Book and Claim (B&C): RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim.	Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.	Complied

5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.	Complied
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.	 Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted. 	Complied
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.	Details of RSPO Trademark License of SD Guthrie Berhad as below: License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.	Complied



MODULE A – IDENTITY PRESERVED		
95% of the palm oil content must be RSPO IP certified.	The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. Cross refer to Indicator 3.8.12 for further information.	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 mill does not have any intention to accept and process any non-certified FFB, CPO or PK. Cross refer to Indicator 3.8.12 for further information.	Complied
Messaging		
 Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements: 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 	Mosa Palm Oil Mill producing crude palm product and does not involve in any labelling of end product.	Not Applicable
Product-Specific Communications Labelling		
 Members are allowed to use the RSPO Label in one of the following ways: RSPO Trademark that includes the tag "CERTIFIED"; or RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	Mosa Palm Oil Mill producing crude palm product and does not involve in any labelling of end product.	Not Applicable



4: Respect community and human rights and deliver benefits 4.1: The unit of Certification respects human rights, which includes respect	octing the rights of Human Rights Defenders	
	acting the rights of Human Rights Defenders	
4.1: The unit of Certification respects human rights, which includes respect	acting the rights of Human Dights Defenders	
	ecung the rights of numan kights belenders.	
C) A policy to respect human rights, including Prohibiting retaliation gainst Human Rights Defenders (HRD), is documented and ommunicated to all levels of the workforce, operations, supply chain and ocal communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security orces. Critical (Major) compliance -	SD Guthrie Berhad has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spelt out in the Human Rights Charter (HRC). The HRC was last revised in 2020. It promotes the human rights, safeguard democracy and its institutions and not violate the rights of others. It also recognizes the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, the company is committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration, and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as responding to complaints on any alleged threats made to them. Apart from posting on the company's website, the policy was also communicated to the stakeholders mainly through stakeholder meetings and workers' routine musters.	Complied
The unit of certification does not instigate violence or use any form of carassment, including the use of mercenaries and paramilitaries in their operations. Minor compliance -	SD Guthrie Berhad prohibits any form of violence or harassment in their operation as per the above-mentioned policies. Based on interview with sampled workers and gender-based representatives, there has been no case reported with regards to instigation of violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Complied
	he unit of certification does not instigate violence or use any form of arassment, including the use of mercenaries and paramilitaries in their perations. Minor compliance -	was last revised in 2020. It promotes the human rights, safeguard democracy and its institutions and not violate the rights of others. It also recognizes the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, the company is committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration, and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as responding to complaints on any alleged threats made to them. Apart from posting on the company's website, the policy was also communicated to the stakeholders mainly through stakeholder meetings and workers' routine musters. SD Guthrie Berhad prohibits any form of violence or harassment in their operations. Minor compliance - was last revised in 2020. It promotes the human rights, safeguard democracy and its institutions and not violate the rights of others. It also recognizes the important role Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Declaration on Human Rights Defenders. In accordance with the United Nations Decl

4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	stakeholders, including employees, have the right to raise	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	 Addressed in the NBPOL-WNB's Communication & Consultation Procedure, version 3, dated 15/06/2023, with the following overarching objectives: Facilitate the open and efficient exchange of information among all stakeholders of NBPOL, which encompasses both internal parties (including employees) and external stakeholders. Address and promptly rectify grievances or concerns raised against NBPOL's operations in a timely and appropriate manner. This procedure clearly delineates the department responsible for responding to various types of communications. For instance, the Sustainability Department will handle communication with NGOs and government bodies pertaining to environmental, social, and new development projects. These communications may take in the form of written correspondence, phone calls, emails, or verbal discussions. The details of grievances or communications will be meticulously recorded in grievance registers and community request books at the respective sites. 	Complied

		 The timeline for managing and responding to grievances and requests is as follows: For internal grievances, responses are to be provided within 10 days of reporting. Any grievances requiring further investigation must be communicated to the involved party within a maximum of 90 days. In the case of external grievances, the receiving Department is expected to respond within 30 days. Any grievances necessitating additional investigation should not exceed a 90-day timeframe. The procedure has been communicated to internal stakeholders, such as employees and their dependents residing within the compound, during social awareness programs. Based on interviews, the sampled workers can demonstrate their good understanding on the procedure. 	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Based on the complaint/grievance records, there is a part where the complainant needs to sign for acknowledgement. Based on the samples, the complaints/grievance raised were found to be appropriately handled according to the procedure.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	According to the statement outlined in the Whistle-blower Policy, complainants are given an additional option. In the event of their dissatisfaction with the company's response, they possess the right to escalate the matter and access to independent legal and technical advice.	Complied
Criterio	n 4.3: The unit of Certification contributes to local sustainable developmen	It as agreed by local communities.	
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Some notable contributions to community development by Mosa Oil Mill are providing job opportunity for the locals. Majority of the	Complied



- Critical (Major) compliance -

	Smallholder requirements: Smallholder should participate in Field days and other extension activities delivered by organization managing the smallholders. All records shall be maintained.	workers are from the surrounding communities. Other contributions such as providing various facilities such as transportations, sport facilities, road maintenance were also made by the NBPOL group level.	
	- Minor compliance -	<u>Smallholder</u>	
		Field day has been conducted by the smallholder affair (SHA) department and collaborations with OPIC for each smallholder division. The purpose of the field day is to communicate the information of the company policy and SOPs, explanation on FFB pricing and deduction and others related requirement for RSPO. Sample of field day conducted as per below.	
		 Field day report for Rerengi & Ismin VOP on 28/05/2024 Field day report for Nahavio Division on 28/05/2024 Field day Report for Kumali and Mingai dated 14/05/2024. Field day report for Gule VOP, Siki Division dated 30/07/2024. Field day report for Galai LSS, Bovussi Division dated 11/06/2024 and 25/07/2024. 	
		,, · · · · · · · · · · · · · ·	
Criterio	n 4.4: Use of the land for oil palm does not diminish the legal, customary of	or user rights of other users without their free, prior and informed con	sent.
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process where such documents have been issued by the appropriate Government agency. For Customary land where such documents are not available, evidence of ownership will be demonstrated as follows:	Mosa POM is situated in a land leased by NBPOL from the government for 99 years from 01/08/1968. The lease agreement between NBPOL-WNB and Government of Papua New Guinea and the title deed was made available for verification.	Not Applicable



	4.4.1(a) For PNG, there are no written laws on customary land, but decisions are guided by customs of the landowning group or clan and documented in a CLUA (Customary Land Use Agreement) which is valid for one planting cycle only. Decisions on land use and distribution are normally done conventionally at the level of the clan and may vary from clan to clan. Individuals only have exclusive rights to use and occupy land based on verbal and mutual agreement, whilst undisputed outright ownership status of customary land is vested in the clan. Traditionally, clans decide on occupancy and user rights. One has to be a member of a	its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated	
	land-owning group through custom in order to have access to land. 4.4.1(b) For Solomon Islands, Customary Land may be recorded in accordance with the Customary Lands Record Act 1994 (as amended). This act provides for the Recording officer appointed by the National Records to determine the Customary Owners, the survey the land with maps to be held at the Central and other Land Record offices. Other mechanisms to manage Customary Land may be applied.	Not applicable for Papua New Guinea.	
	Companies must be able to demonstrate that where they have leased customary land, they have negotiated with the recognised owners of the land or their authorised representatives and have observed full FPIC requirements in those negotiations with all required details being appropriately documented.		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups,	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	including information on the steps that are taken to involve them in decision making - Minor compliance -		
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken - Minor compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and the English language, including assessments of impacts, proposed benefit sharing, and legal arrangements. Explanatory documentation may be provided in Tok Pisin in PNG or Solomon Pijin is the Solomon Islands and verbal presentation may be made in those languages. - Minor compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable

...making excellence a habit."

	- Critical (Major) compliance -		
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is reviewed in consultation with affected parties midway through the term of the agreement however regular communication between the parties is encouraged through the duration of the agreement. - Minor compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
	on 4.5: No new plantings are established on local peoples' land where it called the white the called the with through a documented system that enables these and other stakes.		
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	There has been no new planting development since the last assessment visit. Should there be any, Management Guideline MG-21 Lands & Mini Estates Guidelines for Land Acquisition Practices rev. 3, dated 06/2014 will be used.	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 -	assessment visit. Should there be any, Management Guideline MG- 21 Lands & Mini Estates Guidelines for Land Acquisition Practices	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. - Minor compliance -	There has been no new planting development since the last assessment visit. Should there be any, Management Guideline MG-21 Lands & Mini Estates Guidelines for Land Acquisition Practices rev. 3, dated 06/2014 will be used. As identified in the Management Guidelines, environmental and social impact shall be considered.	Complied



4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	There has been no new planting development since the last assessment visit. Should there be any, Management Guideline MG-21 Lands & Mini Estates Guidelines for Land Acquisition Practices rev. 3, dated 06/2014 will be used.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There has been no new planting development since the last assessment visit. Should there be any, Management Guideline MG-21 Lands & Mini Estates Guidelines for Land Acquisition Practices rev. 3, dated 06/2014 will be used.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator - Minor compliance -	There has been no new planting development since the last assessment visit. Should there be any, Management Guideline MG-21 Lands & Mini Estates Guidelines for Land Acquisition Practices rev. 3, dated 06/2014 will be used. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	There is no new land acquisition no intention to acquire new land since the last assessment.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation unless a full FPIC process has been undertaken with recognised community representatives and their right to use the land is verified in accordance with 4.4.1. - Critical (Major) compliance -	There is no new land acquisition no intention to acquire new land since the last assessment.	Complied

4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. Distribution of monies within families is determined by the families. Guidance: Where possible, Companies shall set up banking arrangements with the ILGs to provide for monies to be paid directly into members' bank accounts at the agreed percentages to avoid the possibility of theft or diversion of funds. - Critical (Major) compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings in accordance with National law. - Minor compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them provided that the right to privacy and confidentiality is respected - Minor compliance -	its scope of certification. All the registered supply bases are of	Not Applicable

4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
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 -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
Criterio rights.	on 4.8: The right to use the land is demonstrated and is not legitimately co	ntested by local people who can demonstrate that they have legal, cu	stomary, or user
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.	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
	Guidance: In some circumstances where FPIC was conducted many years ago, documented evidence of the process may not be available. In these cases, evidence of continuing agreement of all parties shall be regarded as evidence of resolution. - Minor compliance -		
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	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable

	certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
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 -	Mosa Oil Mill certification unit does not have NBPOL's estates under its scope of certification. All the registered supply bases are of smallholders and small growers. Moreover, the mill is not situated on any customary land.	Not Applicable
Principl	e 5: Support smallholder inclusion		
Criterio	n 5.1: The unit of certification deals fairly and transparently with all smallh	olders (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 -	FFB pricing for previous and current is made available which can be sighted in the document WNB- FFB price. Sample has been taken and verified for month May'24, June'24 and July'24. The management has established mechanism to disseminate information on the FFB pricing through field supervisor and that has been allocated for each division and also through Oil Palm Industry Corporations (OPIC) which will be posted at the social media and notice board. It has been verified by auditor through interview with smallholders and site visits.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders. - Critical (Major) compliance -	There is evidence that SHA has been explained to all smallholders during the field visit and as per interview with smallholder, all the	Complied

		smallholders can demonstrate their understanding on the FFB pricing. Details of training conducted as per below a) 01/08/2024, for Morokea Division, b) 09/08/2024 for Hark VOPs, c) 18/04/2024 for Vavua VOP on d) 09/08/2024 for Koimumu VOP e) 24/07/2024 for Mai VOP Smallholders can request for further explanation on the FFB pricing and calculation through OPIC which required to fill up the incident/accident/grievance form.	
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. Premium pricing, when achieved for RSPO certified sustainable palm oil is also shared with Smallholders. - Critical (Major) compliance -	There is evidence that the FFB pricing has been calculated based on international CPO prices which that has been taken base on US dollar price for CPO CIF Rotterdam. Sighted the calculations derived from the Oil Extraction Rate and Kernel Extraction Rate and deduction for OPRA, Sexava and OPIC levy	Complied
5.1.4	(C) Evidence is available that all parties within the Unit of Certification, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the basis on which their fruit is sold to the Companies. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. To assist this, Companies include financial literacy information in their extension activities. - Critical (Major) compliance -	There is evidence that men and women has been given equally right in managing his/her land which can be sighted base on sample taken. Sighted the management has established two types of payment which are primary card for the landowners and mama card for the spouse. It also has been verified that women that owned the land can decide for deduction (fertilizers, tools) and also for savings (Nas Savings)	Complied

5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe their obligations and the obligations of the Company to whom they are selling their fruit. - Minor compliance -	There is no contractual agreement between NBPOL and smallholders. NBPOL is obliged to process all smallholders FFBs in accordance with the International Development Association for agricultural development Act 1970. The growers have signed a <i>Growa Stetment Fom</i> where they have acknowledged and committed to comply with all legal and RSPO requirements. Interview with the sampled smallholders clearly indicated that they understand and implement the standards that have been put in place by RSPO and NBPOL.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. Guidance: Weight of FFB may be determined by weighing at the point of pick-up or by calculation of average bunch weight when weighed at the verified mill weighbridge. The organization managing the smallholders should determine the data used for payment and communicated to all smallholders. - Critical (Major) compliance -	It has been verified based site visit and the smallholders block where the FFB that has been pickup will weigh at the block by the lorry operator and assisted by the crane operator. The information recorded for smallholders, lorry driver and crane operator through the systems where e-tag which contain all the information required and will be scanned through scale machine, Tramanco. Smallholders will be provided with the copies of docket which provide information on the tonnages, date, lorry driver and crane operator and smallholder ID. The FFB will again will be weigh at Palm Oil Mill. Comparison between the block weigh and mill weigh will be done by the Palm Oil Mill.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). Other weighing equipment used may be calibrated using weights that are verified on the weighbridges. Records are maintained to provide an audit trail. - Minor compliance -	estates. Each mill is equipped with its own weighbridge, which is	Complied
		blocks and deliver it to the mill. The FFB is weighed on-site at the	

		marketplace (block platforms) using a calibrated crane, in the presence of smallholder and mini estate management. A chit is issued to the growers, indicating the weight of each net of FFB. The trucks then proceed to the mill, where the FFB is weighed again on the mill's weighbridge before unloading at the mill ramps. If there are discrepancies of +/- 300 kg between the weighbridge ticket and the marketplace weight, the trucks are sent to the Transport Department for recalibration. This process involves lifting a 1.542 mt calibrated block with the truck's crane system on the weighbridge. If discrepancies persist, the crane system is repaired and recalibrated until the recalibration shows a result of 1.520 mt, with an allowable variance of +/- 10 kg. Only after this calibration process is complete can the trucks resume FFB collection.	
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 -	WNB — NBPOL continuously supports smallholders through its Smallholders Affairs Department. In collaboration with OPIC, the SHA Department conducts regular Field Days and Field Visits to provide ongoing training, particularly in Good Agricultural Practices (GAP), and to assist smallholders in complying with RSPO standards and national regulations. This support was confirmed by smallholders during interviews conducted as part of the sampling process.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Grievance mechanism for smallholders has been outlined in the Grievance Flowchart for smallholder growers updated on April 2018 by NBPOL WNB Sustainability Department. Any grievances raised by the smallholders need to be done through OPIC and by filling up the incident/ accident/grievance form and will be escalated by OPIC to smallholder's department. As per SOPs stated that all grievances need to be responded within 30 days of complaint received. Sample of grievance that reviewed by the auditor.	OFI

		 Grievances received on 10/06/2024 reference number SIK-1063, grievances on FFB that has not been paid on pay period ending (PPE) of 02/06/2024 and the issues has been escalated to transport department and payment has been made to the smallholders Grievance received on 21/02/2024 where their smallholder requested to remove contribution for Eda Supa Savings and removal has been made on 20/03/2024. Grievances received on 29/04/2024 reference NAH-1551 where the smallholders not satisfied with field weighing. The issues have been escalated to transport department and the discrepancies is below than 300kgs OFI Grievance mechanism can be further improved by ensuring that all grievance respond responded by the Smallholders Affair 	
0 11 1		Department reach the smallholders.	
	n 5.2: The unit of certification supports improved livelihoods of smallholde		
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 -	WNB – NBPOL continuously engages with smallholders, regardless of race, religion, or gender, through its Smallholders Affairs Department to assess their needs and provide support to improve their livelihoods. In collaboration with OPIC, the SHA Department conducts regular Field Days and Field Visits to offer ongoing training, particularly on methods to enhance production and overall well-being. This support was confirmed by smallholders during the interviews conducted as part of the sampling process.	Complied
5.2.2	The Company and Government Extension Service provide extension services to support the development and implementation of livelihood improvement programmes, including capacity building to enhance	The NBPOL-WNB Smallholders Affairs Department offers extension services to support the development and implementation of livelihood improvement programs. These services include	Complied

	productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard. PROCEDURAL NOTE: The RSPO is currently developing a separate standard for Independent Smallholders to be referred to as the "RSPO Independent Smallholder Standard". A National Interpretation for PNG&SI will be developed after the standard is ratified. - Minor compliance -	consultations, fertilizer loans, and vehicles for transporting FFB. Consultation on Best Management Practices (BMPs) is provided during Field Days, Internal Audit Inspections, and various training sessions conducted by the SHA team. This support was further confirmed by smallholders during the sampled interviews.	
5.2.3	Where applicable, the Company and Government Extension Service provide extension services to Smallholders to enhance their understanding of the legal requirements for FFB production to maintain RSPO certification. - Minor compliance -	The NBPOL Smallholders Affairs Department has appointed a Person-in-Charge (PIC) for each smallholder group, responsible for communicating and training on legal requirements. This arrangement was confirmed by smallholders during the sampled interviews.	Complied
5.2.4	(C) Evidence exists that pesticide handling training is available from the Company and/or Government Extension Service for Smallholders within the Unit of Certification. This may be verified by interview with the Smallholders. - Critical (Major) compliance -	Most of the smallholders are doing grass cutting in the farms where it has been done by the owners of the land assisted by the family. Chemical handling training has been conducted by Smallholder Affair Department (SHA) in case that the smallholders has intention to use chemical in the future. It has been conducted during the field days and during the sit visit. Details as per below	Complied
		 Field day report for Rerengi & Ismin VOP on 28/05/2024 Field day report for Nahavio Division on 28/05/2024 Field day Report for Kumali and Mingai dated 14/05/2024. Field day report for Gule VOP, Siki Division dated 30/07/2024. Field day report for Galai LSS, Bovussi Division dated 11/06/2024 and 25/07/2024. 01/08/2024, for Morokea Division, 09/08/2024 for Hark VOPs, Vavua VOP on 18/04/2024 	

		9. 09/08/2024 for Koimumu VOP	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The progress and performance of smallholders are documented in field inspection reports, which are publicly accessible. Samples of field inspection reports for smallholders for the year 2024 were reviewed.	Complied
Princip	ole 6: Respect workers' rights and conditions		
Criteri	on 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 -	NBPOL is adopting SD Guthrie Berhad's Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age. They will facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy can be downloaded from https://www.sdguthrie.com/ . The policy was also communicated to the stakeholders through several other ways such as stakeholders' workshop, display on notice boards, trainings, and briefings.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated	Based on interview with the workers and groups including local communities from different gender, origins, and job types, it is confirmed that there was no discrimination reported. The	Complied

	against. Evidence includes migrant workers' non- payment of recruitment fees Critical (Major) compliance -	management has treated all employees equally for example in term of provision of accommodation, medical treatment, job opportunity, wages rate, etc.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	The HR Department of NBPOL-WNB and the management of the sampled operating units were able to demonstrate the recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness through explanation of various processes which supporting documents such as application forms, offer letters, employment contracts, medical check-up results, and pay slips to name a few.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Based on interview with the female employees at the sampled operating units, pregnancy testing is not conducted as a discriminatory measure, unless with the consent from workers for other purposes. No pregnancy test is included in the preemployment medical check-up.	Complied
6.1.5	(C) A Social Issues Committee (SOC) is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	NBPOL has introduced the guidelines for the Social Issues Committee, entitled "Enhancing and Implementing Gender Equity and Social Inclusion in the Workplace," dated May 2020. The company is firmly dedicated to fostering a just and equitable environment that is devoid of discrimination. This commitment extends to ensuring the active involvement, accessibility, and social inclusion of women, individuals with disabilities, people living with HIV and AIDS, and other marginalized groups in all facets of NBPOL's operations. The Social Issues Committee has been established to formulate, implement, and oversee the effectiveness of the Standard Operating Procedures (SOPs) developed for this purpose. The committee's responsibilities encompass raising awareness, identifying, and addressing concerns specific to women, recognizing opportunities for improvement, and ensuring the execution of Gender Smart Audits and subsequent	Complied

		recommendations. Minutes of meeting were well maintained and made available for verification.	
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	Based on the sampled payslips, which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the pay rate stated in the employment contract without any form of discrimination. This was also evident through interview with sampled workers.	Complied
	on 6.2: Pay and conditions for staff and workers and for contract workers a living wages (DLW)	always meet at least legal or industry minimum standards and are suffi	cient to provide
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in the English language and verbally explained to them in language they understand. - Critical (Major) compliance -	Based on verification of the employment contract, which is written in English, the terms and conditions stipulated found to be complying with the applicable legislations such as Employment Act No. 54 in 1978 (Consolidated up to March 31/03/2001), National Gazette No. G775 Public Holiday Act (Chapter 321), and National Minimum Wages revised on 01/01/2023. Based on interview with the sampled workers, generally they have a good understanding about the pay and conditions. They also knew how to seek for clarification if needed.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.	employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, to name a few, found to be complied with the	Complied
	Family members who work must be employed to ensure that they have access to those benefits. Notwithstanding that, young children may assist their parents on Smallholder blocks provided it does not interfere with		

	their schooling, their physical and emotional development and they are under the direct supervision of their parents. - Critical (Major) compliance -		
6.2.3	(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. - Critical (Major) compliance -	Several workers from various operations such as mill operators, laboratory, security, and general workers were sampled for evidence of compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. Based on verification of employment contracts, payslips, medical certificates, punch cards, and interviews, there was no evidence of legal requirements being breached.	Complied
6.2.4	(C) The Company 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. Smallholders may live in houses of traditional materials or other accommodation of their choosing. - Critical (Major) compliance -	Workers are accommodated at the housing complex quarters of the operating unit without any charges. Essential facilities such as potable water, electricity, medical clinic are also provided to all workers without any charges. Housing inspections are conducted on quarterly basis by the management using the Housing Repair and Maintenance Checklist (PF29) to identify any defects of the house building and sanitation facility. Once identified, notification to the company's Construction Department will be made for further actions. Based on samples of the PF29, most of the repair and maintenance were done in timely manner. School is available within the operating unit which is just a walking distance. Transportation is provided without charges if the school is not a walking distance.	Complied
6.2.5	The unit of certification being the mill and Company operated plantations makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	There was no issue on accessibility to adequate and sufficient food supplies as sundry shops, which are run by third party vendors, are available in most of the housing complex. Workers are also free to go to the nearby towns for more options of groceries. There has been no complaint received with regards to the price of supplies. Based on interview, the basic supplies were affordable. The company is also monitoring the prices of goods by requesting the	Complied



		vendors to provide their price list every month as spelt out in the contract agreement. Visit to the shop confirmed that the goods are sold according to the price list.	
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks. In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks1. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations. For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage.	Decent living wages (DLW) report for financial year 2024 is available for verification. It was prepared by Diane Mandui Mirio, consultant from Nara Kain Wei Community Training and consultancy. Based on the report, there is no national guideline for decent living wages for Papua New Guinean. The assessment for decent living wages conducted on participatory ways where a total of 970 workers were interviewed based on the RSPO Decent Living Wages Guidelines and Global Living Coalition Network (GCLN). It is reported that workers received an average of PGK3.71/hour/worker, which is above the regulated minimum wage.	Complied
	Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:		
	Updated assessment on prevailing wages and in-kind benefits		
	There is annual progress on the implementation of living wages		
	• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be		

	used as the foundation for the gradual implementation of the living wage payment • The UoC may to choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. - Minor compliance -		
6.2.7	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. - Minor compliance -		Complied
freedom	on 6.3: The unit of Certification respects the rights of all personnel to form of association and collective bargaining are restricted under law, the employersonnel.		
all Such	personner.		
6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand and is demonstrably implemented. - Critical (Major) compliance -	documented in the "Employee Rights & Equal Employment	Complied

6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	There was no interference by the management with the formation or operation of the trade union. The chairman and office bearers were appointed through voting during their AGM, which was last conducted in 2021. The next voting is expected to be conducted in 2025. This is confirmed through interview with the Chairman of the union.	Complied
Criterio	on 6.4: Children are not employed or exploited.		
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	Policy for child protection is documented in the Minimum Age Specification policy version 03/09/2023. In this policy, young person is defined as a person of age between 14 and 18 years old. It is also stated as NBPOL is a part of SD Guthrie Berhad recognizes to protect the wellbeing of children and young people in line with national and international requirement. All contractors are required to adhere to the policy and shall not employ any persons under the age of 18 years old. Based on the verification of documents, site observations, and interview with the employees, there was no evidence that the company is hiring children.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure which must be carried out by clinic or supervisory staff to be applied where other documentary evidence of date of birth is not available. - Critical (Major) compliance -	As per PNG's Employment Act No. 54, 1978, revised in 2001, young worker is defined as 11 to 16 years old. However, based on NBPOL policy, recruitment of new workers shall only be done for person that above 18 years old. Age screening procedure is described in the policy mentioned in Indicator 6.4.1, clause 3.0, where applicant is required to present several documents as part of the age confirmation process, such as birth certificate, school certificates, letter from parent(s) confirming the date of birth, and letter from the village court or district court. Copies of those documents were made available for verification.	Complied

6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. Normally the minimum age for employment by the Company is 18 year however in certain circumstances such as school work experience, persons as young as 16 years may be employed. These persons are classified as Young Persons. - Critical (Major) compliance -	the certification unit based on the evidence described in Indicator	Complied
6.4.4	The Company demonstrates communication about its "no child labour" policy and the negative effects of child labour through notices at workers' housing compounds and Smallholder field days. It promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -		Complied

		 Annual External Stakeholder Workshops: These workshops, held on an annual basis, serve as a platform to reinforce the company's policies, including the Human Rights Policy, among external stakeholders. Display on Notice Boards at OPIC: NBPOL-WNB's policies, including the one concerning child labour, are posted on notice boards at the Oil Palm Industry Corporation (OPIC) for enhanced visibility and accessibility. 	
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. - Critical (Major) compliance -	NBPOL-WNB adopts sexual harassment policy and other	OFI

6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. - Critical (Major) compliance -	Addressed in the Gender Right policy, dated 12/07/2023, signed by the general manager, Mr Azhazha Abdul Aziz. Based on the policy, NBPOL-WNB is committed to protect reproductive rights for female workers. Among the measures to ensure the commitment is implemented are through prohibition of sanction, prohibition of dismissal due to pregnancy and maternity leave, and to provide special protection to women during pregnancy especially in allocating types of work proved to be harmful to them. Apart from that, the management will ensure that no pregnant worker and breastfeeding mother is allowed to do any task that involved with chemicals. Based on site observations, interview and documents verification, there was no evidence that pregnant or breastfeeding workers are assigned to do task involved with chemicals. Smallholders	Complied
		Training on reproductive rights has been conducted at 01/08/2024, for Morokea Division, 09/08/2024 for Hark VOPs, Vavua VOP on 18/04/2024 and 09/08/2024 for Koimumu VOP. Policy on Sexual Harassment was available	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and a procedure has been determined that identifies actions are taken to address the needs of them and their babies. - Minor compliance -	On general practice, assessment of new mothers is done through gathering of information with regards to the needs of the new mothers through face-to-face interview by trained clinic staff. Records of assessment and the identified needs were well maintained and made available for verification.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	Mechanism to make any complaint related to sexual harassment and other harassment is outlined in the Sexual Harassment policy, dated 12/07/2023, signed by the general manager, Mr Azhazha Abdul Aziz. The level of reporting is clearly described in the procedure which include the anonymity and confidentiality of information. Through interview, workers were able to explain on how to lodge any harassment report.	Complied

Criterio	Criterion 6.6: No forms of forced or trafficked labour are used.		
6.6.1	 (C) All work is voluntary and following are prohibited: Retention of identity documents or passports Payment of recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages Note: where a Company has advanced money to an employee as a loan, this is to be regarded as a debt to the Company by the employee and a documented arrangement for repayment is to be established that is acceptable to both parties. Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. Critical (Major) compliance - 	Based in interview with workers, site observation, and documentation review, there was no evidence of any of the prohibitions listed in this indicator was breached. A worker has the freedom to join and leave the company without any fear for identity documents being retained, payment of recruitment fees, contract substitution, involuntary overtime, penalty for termination of employment, debt bondage, and withholding of wages. Smallholder As per interview during the site visit at smallholders block, there is evidence that all smallholder can explained about the basic of force labor.	Complied
6.6.2	(C) Where temporary or migrant workers are employed for seasonal or activity related periods of high demand, these are regarded as "casual" workers. A specific labour policy and procedures for casual workers are established and implemented. - Critical (Major) compliance -	Documented in the "Temporary Employment Policy" dated 12/07/2023 signed by general manager, Mohamed Azhaza Abdul Aziz. Temporary worker is defined as a person that works minimum 88 hours per fortnight for a fixed short-term period according to their written contract which included seasonal labour. The process of recruiting temporary workers is outlined in the same document which describes that decision for recruitment is based on assessment only if the works cannot be completed by the current manpower. Requests need to be submitted to human resources	Complied

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		department by completing all human resources documents which included medical examination. Employment contract has been signed and orientation has been conducted. Once the contract expired as per agreed timeline stated in the contract agreement, the management can decide either to permanently recruited the workers or proceeds for terminations.	
Criterio	n 6.7: The unit of certification ensures that the working environment unde	r its control is safe and without undue risk to health.	
6.7.1	(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. - Critical (Major) compliance -	It has been stipulated in the Operational safety management plan dated August 2024 issuance;9 approved the General Manager of West New Britain clause 3.2; OH&S roles and responsibilities- OH&S committee which need to be established chaired by respective manager. For Mosa Palm Oil, safety committee has been established chaired by Mr Chong Fah Fook as the Palm Oil Mill Manager and total 10 workers representative. Stated in the Operational Management Plan, there is 2 OSH meeting need to be conducted which are Department OH&S Committee Meeting (bi-monthly) chaired by Head of Mills. And operating site OH&S committee meeting (monthly) chaired by the site manager. Department OH&S committee minutes conducted in 03/05/2024 chaired by Mr Gopinathan. Minutes meeting for site OH&S committee meeting sighted to discuss issues related to health, safety and welfare that has been	Complied
		conducted on monthly basis. Sample has been taken for meeting 29/07/2024, 26/06/2024 and 31/05/2024	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in	Accident and emergency procedure has been established NBPO Emergency Response Plan and Emergency Response Procedure	Complied

...making excellence a habit."

	the appropriate language of 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. - Minor compliance -	document No: EF-EP05-03 reviewed in August 2023. The procedure has been communicated to all workers during the emergency drill latest conducted on 28/07/2024. 1st aider training conducted 17/07/2024 internally and by PNG Red Cross on 28/0/2024 Records of all accidents has been maintained in the Injury Assessment Report (IAR) records number 11806 dated on 02/12/2023	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, 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. - Critical (Major) compliance -	The management provides appropriate PPE to the employees in accordance with the WRA and SOP. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e., coverall, safety shoes, gum boots, mask, respirator, helmet, goggle, and gloves,), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with workers showed that the appropriate PPE was provided for free and worn accordingly.	Complied
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 national law or by the unit of certification where national law does not offer protection. - Minor compliance -	Should there be any medical care needed by the employees, clinics with certified person in-charge were provided at all the sampled estates. Based on site visits, all the clinics were well maintained and managed. NBPOL WNB is subscribing to a Life Insurance (Death Benefits) to cover the accident insurance for all their employees. Insurance claims are centrally managed by the Human Resource Department. Verification of sampled claims showed that the claims were generally made in appropriate manner.	Complied



6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Mosa Palm Oil Mill Lost time accident has been documented in the document Lost time Injuries (LTI) for year 2023 and 2024. Sample has been taken as below a) 21/10/2023- Lawrence Tenge- Lost work day: 1 b) 02/12/2023- Lesley Jimbira- Lost work day: 2 c) 10/12/2023- Micheal Kaman- Lost work day: 1	Complied
Princip	le 7: Protect, conserve and enhance ecosystems and the environment	ent	
Criterio	on 7.1: Pests, diseases, weeds and invasive introduced species are effective	ely managed using appropriate Integrated Pest Management (IPM) tecl	hniques.
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. Smallholder requirements: Organization managing the smallholders to manage IPM program for smallholders. - Critical (Major) compliance -	Smallholders NBPOL has adopted the Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. Integrated Pest Management (IPM) Plan, dated 01/06/2020, for implementing IPM among smallholders. IPM training is provided during Field Days. Training records for smallholders include: • Ganoderma & Chemical Handling Training dated 02/07/2024 • Awareness Training dated 10/08/2024 • Meeting & Training dated 24/07/2024 A Pest Infestation Programme is in place to assess pest issues on smallholder farms and provide recommendations. Verified records include: • Bilomi Div 1 dated 07/03/2024, Reference File 02924 • Siki Div dated 23/02/2024, Reference File 02524 • Navahio Div dated 10/04/2024, Reference File 04524	Complied

		A meeting on pest and disease was conducted, with the following agenda items discussed in the Pest & Disease Meeting Minutes dated 26/06/2024:	
		Matters arising from the previous meeting	
		Entomology Update	
		Training/Educational Awareness	
		OPIC Weekly Divisional Report	
		Overage Palm	
		Sanitation Update Report	
		SHA Report	
		Road Report	
		Loose Fruit Scheme Report	
		Interviews with sampled growers confirmed their awareness of the IPM programs and requirements. They have adopted practices such as using Dimehypo for insecticides.	
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. Any imported species must first be approved in PNG by National Agriculture Quarantine and Inspection Authority (NAQIA) and in the Solomon Islands by Biosecurity Solomon Islands (BSI). - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
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.	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
	- Minor compliance -		

7.2.4	(0) 7 (0) 1 (1) (1) (1) (1)	N. P. H. M. B. L. O'I M'III. I	N. 1 A. 12 1.1
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. - Critical (Major) compliance - 	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. Smallholder requirements: Organization managing the smallholders to maintain records of herbicide issue to smallholders. - Critical (Major) compliance -	Smallholders Chemicals for pesticide control are issued by NBPOL. The records of chemicals issued are maintained under the Pest Treatment Monitoring Sheet for 2024, managed by the Smallholder Affairs Department.	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. Smallholder requirements: Organization managing the smallholders to manage IPM for smallholders. - Critical (Major) compliance -	Smallholders NBPOL has adopted the Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. Integrated Pest Management (IPM) Plan, dated 01/06/2020, for implementation among smallholders. IPM training is regularly provided during Field Days for both smallholders and mini estates. The following training records were verified: • Ganoderma & Chemical Handling Training: 02/07/2024 • Awareness Training: 10/08/2024 • Meeting & Training: 24/07/2024 Management also conducts a Pest Infestation Programme to assess pest issues on smallholders' farms and provide recommendations. Verified records include: • Bilomi Div 1: 07/03/2024, Reference File 02924 • Siki Div: 23/02/2024, Reference File 02524 • Navahio Div: 10/04/2024, Reference File 04524	Complied

		Additionally, a meeting on IP was held with the following agenda items: Matters arising from the previous meeting Entomology Update Training / Educational Awareness OPIC Weekly Divisional Report Overage Palm Sanitation Update Report Road Report Road Report Loose Fruit Scheme Report Interviews with sampled growers confirmed their awareness of the IPM programs and requirements, and that NBPOL is effectively managing the smallholders' pest management practices	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat 7.2.5b Why there is no other alternative which can be used 7.2.5c Which process was applied to verify why there is no other less hazardous alternative	Smallholders Interviews with sampled smallholders revealed that most prefer manual brushing to control weeds in their blocks, avoiding the use of chemicals. For those who do use chemicals, NBPOL provides Class 3 and Class 4 chemicals specifically for weeding. The application of these chemicals adheres to NBPOL's guidelines and Standard Operating Procedures (SOPs). Notably, there is no use of chemicals classified under Class 1a and 1b.	Complied

7.2.6	 7.2.5d What is the process to limit the negative impacts of the application 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. Smallholder requirements: Smallholders not using pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Smallholders to follow the policies of the organization managing the smallholders Minor compliance - 	Smallholders	Complied
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. Smallholder requirements: Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements. - Critical (Major) compliance -	 Smallholders Smallholders and mini estate growers who wish to use chemicals must first obtain a certificate from OPIC. This certification process includes: Training and Competency Assessment: Growers must complete specific trainings, as outlined in the "Smallholder Management Training Guideline – Pesticide Practice," and undergo competency assessments conducted by OPIC personnel. Certification: Once training and assessment are completed, a certificate is issued, which permits them to purchase and apply chemicals on their plots. Verification: During site visits, the certification for those who use chemicals was verified, and growers demonstrated their understanding of chemical handling, storage, and application. The procedures are detailed in the SOP on Chemical Handling: "A Smallholders Management Training Guideline – Pesticide Practices," Revision No 1, dated 01/05/2016. 	Complied



7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices. Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -	 Smallholders Chemical Use and Storage Among Smallholders Chemical Usage: Primary Practice: Most smallholders use manual brushing to control weeds and avoid chemical use. Occasional Use: Some mini estates and a few smallholders use chemicals for weed control. Source of Chemicals: Chemicals are supplied by NBPOLWNB. Chemical Storage: Facilities: Chemicals are stored in dedicated sheds at the smallholder and mini estate plots. Safety Measures: Sheds are locked and well-ventilated. 	Complied
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. Empty pesticide containers may be used for pre-mixing spray solution before transport to the plantation for use by sprayers. In this case they must have visual identification such as painted lines around them. Smallholder requirements: The requirements fully applicable to smallholders. - Minor compliance -	Chemical Container Management	Complied

		Chemical Pits: • Management: Chemical Pits are well-managed. Safety Measures: Adequate signage and barricades are in place.	
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -	Smallholders There was no aerial spraying conducted at in NBPOL WNB and all smallholders' plots	Not Applicable
7.2.10	(C) Specific bi-annual medical surveillance for pesticide operators handling organophosphate insecticides, and documented action to treat related health conditions, is demonstrated. Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -	Smallholders Smallholders Mini Estates and Smallholders that apply pesticides within their block have undergone bi-annual medical surveillance for their pesticide operators. Interview with the sprayers further confirmed that they have been sent for medical surveillances and are provided with the medical results upon it being available. The costs for medical surveillance are absorbed by the management and not deducted from the pesticide operators.	Complied
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -	Smallholders According to the Pesticide Practices Guideline dated 01/05/2027, NBPOL recommends that pesticide spraying is primarily performed by male family members to reduce risk exposure. Female workers, typically engaged as loose fruit collectors, are informed not to handle pesticides if they are pregnant or breastfeeding. Additionally, children under the age of 18 are generally not employed and are prohibited from handling chemicals. Smallholders who have undergone medical surveillance and received negative results are	Complied



		advised against pestic duties.	ide-related work and a	are offered alterna	tive	
Criterio	on 7.3: Waste is reduced, recycled, reused and disposed of in an environment	entally and socially resp	onsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. Smallholder requirements: Smallholders must demonstrate planned waste management and disposal by disposing of waste products in a designated waste pit. - Minor compliance -	Plan, EI-02, revision in D principle: reduce, rethe company's enviror resource efficiency an Key environmental cor NBPOL's Environmental until 3/4/2037 Environmental Papua New Gother types of waste grammarized as follows: Sources Household Industrial activities Workshop/garage	use, recycle, and disponmental management management management management management management management managements managements managements managements managements managements management managem	implements the 3l isse. This plan supports policy by promote neration and disposinclude: Jer Section 65 of Sep-L2B (411), versions. EP-L2B (411), versions. Disposal plan Landfilling composting Landfilling hydrocarbon pit Landfilling	R + orts sing sal. the alid tes,	Complied
		Clinic/aid post	Medical waste	Incineration		

				11	
		Agricultural activities	Fertilizer bags, chemical containers, used PPE	Landfilling (chemical- after triple rinsed and pierced/pesticides pit)	
		Mill wastewater	Palm Oil Mill Effluent (POME)	Open aerated lagoon & land application	
		Hexane/Chemical (laboratory)	Used/spent chemical	Burn as per technical requirements.	
		established by SHA smallholders compour significant risk of wa inorganic and hazardo advise to all smallholde pesticides containers.	on August 2024 to rad. Risk assessment handste which has been ous waste such as pesers to have rubbish pit f	r growers has been manage waste in the is made to identify the classified as organic, sticides container. SHA for domestic waste and ed on implementation auditors.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators. Guidance: With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and	Plan (EI-02), revision no. 11, dated 01/07/2021, outlines waste disposal strategies, specifying that waste should be disposed of in a sanitary landfill in line with the established plan. The landfill's location adheres to NBPOL's environmental permit (EP-L2(411),		Complied	



	compostable waste. Company procedures must state how these waste streams are managed. Smallholder requirements: The requirements fully applicable to smallholders. - Minor compliance -	meters from the nearest surface water or settlement. The landfill is designed according to the DEC Environmental Code of Practice for Sanitary Landfill Sites, DEC 2001. Mosa POM disposes of waste at a landfill managed by Bebere Estate (under Kumbango Palm Oil Mill), and site visits have reported no issues. Smallholders Waste Disposal Practices for smallholder growers has been established by SHA on August 2024 to manage waste in the smallholders compound. Risk assessment has made to identify the significant risk of waste which has been classified as organic, inorganic and hazardous waste such as pesticides container. SHA advise to all smallholders to have rubbish pit for domestic waste and pesticides containers. It has been confirmed on implementation through site visit that conducted for sample auditors.			
7.3.3	Open fire is not used for waste disposal by the Unit of Certification. Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. - Minor compliance -	Mosa POM does not use fire for waste disposal. All waste is disposed of at the landfill and is segregated according to its type. Smallholders Interviews with smallholders and mini estates confirm their understanding that fire is not to be used for waste disposal. They are aware that waste should be segregated and disposed of in designated pits within their blocks. Site visits to sampled blocks confirmed that waste is properly segregated and disposed of in chemical pits, garden waste pits, and hydrocarbon waste pits. There were no signs of fire being used for waste disposal at the sampled smallholders' plots.	Complied		
Criterio	criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.				

7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. Smallholder requirements: Smallholders to implement good agriculture practices as communicated through extension services delivered by organization that is managing the smallholders. - Minor compliance -	Smallholders The Smallholder Affairs Department, in collaboration with OPIC and PNGOPRA, regularly educates smallholders on implementing good agricultural practices (GAP) according to the established SOPs. This ongoing education is delivered through Field Days and field inspections. During site visits to smallholder plots, various GAP practices were observed, including the establishment of buffer zones, frond stacking, pruning maintenance, adherence to harvesting and FFB standards, zero burning, and effective waste management.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. Tissue testing is conducted annually to determine fertiliser requirements for the following year. Soil testing is carried out at replant. Guidance: Smallholders are provided with access to test results applicable to the Company Management Unit closes to their block. Smallholder requirements: Organization that is managing the smallholders to take tissue samples from representative Smallholders annually. - Minor compliance -	Smallholders Leaf sampling has been conducted for 2023 and 2024 and has been documented in the document assessing leaf nutritional status of smallholders in Hoskins, WNB conducted by Head of smallholders and socioeconomic research, PNGOPRA. Sampling was conducted at 21/09/2023 with report reference number 3369578. Among the test conducted was Percentage of Phosphorus, Nitrogen, Boron etc.	Complied
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.4.4	Records of fertiliser inputs are maintained. Smallholder requirements:	Smallholders Fertilizers are provided to smallholders and mini estates based on requests. Growers have the discretion to apply fertilizers to their	Complied



	Organization that is managing the smallholders to maintain records of fertiliser distribution. - Minor compliance -	blocks as they see fit. Fertilizer prices vary monthly and are communicated to growers through notice boards and SHA Department staff. Records of fertilizer delivery to smallholders and mini estates were available and verified, as documented in the "Fertilizer Distribution Records from January – July 2024."	
Criterio	on 7.5: Practices minimise and control erosion and degradation of soils.		
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.5.2	There is no extensive replanting of oil palm on steep terrain. Smallholder requirements: Smallholders do not plant on unsuitable slopes. Organization managing the smallholders to advise on slope suitability after consideration of gradient, soil type, harvesting safety and other relevant issue. - Minor compliance -	Smallholders The Smallholder Affairs Office conducts pre-planting inspections at smallholder plots selected for replanting. A Planting Approval Form – Replant is issued, which involves an assessment by Smallholder Affairs officers of the site's topographical suitability. The Planting Approval Form – Replant was available for verification. Based on this assessment, the office determines which areas should be excluded from replanting due to steep slopes	Complied
7.5.3	There is no new planting of oil palm on steep terrain Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
Criterio operatio	n 7.6: Soil surveys and topographic information are used for site planning ns.	in the establishment of new plantings, and the results are incorporate	ed into plans and
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable



7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
Criterio	on 7.7: No new planting on peat, regardless of depth after 15 November 20	018 and all peatlands are managed responsibly.	
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable

7.7.5	(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. PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG. PROCEDURAL NOTE:	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
	PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]		
	- Critical (Major) compliance -		
7.7.6	(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance. - Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable



7.7.7	(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance - Critical (Major) compliance -				red from certified fair Department	Not Applicable
Criterio	on 7.8: Practices maintain the quality and availability of surface and ground	water.				
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: 7.8.1c The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. 7.8.1d Workers have adequate access to clean water. - Minor compliance -	The Water and Natural Resources Management Plan for NBPOL-WNB, detailed in EI-03, revision 08, dated 13/06/21, outlines the water management strategy. Under the domestic water quality monitoring requirements specified by the Conservation			Non- compliance	
		Parameter	Maximum Permissible Amount	Apr 2024 MOM (Office)	Apr 2024 KOR (Bore)	
		Turbidity, NTU	25	9.7	5.8	



Total Solid, mg/L	1500	170	280
	< 3, if E. Coli is 0	79	27
E. Coli, CFU	0	1	0
*TNTN: To Num Mosa POM	nerous To Count,	CFU > 100	
	Maximum Permissible Amount	Jan 2024 MOM (Office)	Apr 2024 MOM (Compound)
Turbidity, NTU	25	5.5	6.1
Total Solid, mg/L	1500	240	270
	< 3, if E. Coli is 0	30	14
E. Coli, CFU	0	0	0
*TNTN: To Num	nerous To Count,	CFU > 100	
	nformities ater quality repor is above the para		



		Mosa POM				
		Parameter	Maximum Permissible Amount	Jan 2024 MOM (Office)	Apr 2024 MOM (Compound)	
		Total coliform, CFU	< 3, if E. Coli is 0	30	14	
		The management including water sa between the manage	mpling reports	and emai		
		According to the pro- Management Plan, S additional actions are health issues. Howev demonstrating that r as stipulated in the p	ection 6.1.6.3 (I e required in res ver, there is inco management has	Monitoring ar sponse to sucomplete docu	nd Management), ch out of spec and mented evidence	
7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.	restoring appropriate riparian buffers, as outlined in Annex E – Riparian Buffer Widths for Agricultural Development under Environmental Permit [EP-L2 (411)] and incorporated into the Environmental Instruction Water and Natural Resource			Complied	
	Smallholder requirements: Smallholders must protect water courses and wetlands by not polluting with rubbish or other waste.	safeguard areas of development with ed sampled estates, it established well-mai	cological integri t was verified	ty. During the that the	ne site visit to the management has	

...making excellence a habit."

	Critical (Major) compliance	signages erected to	prohibit operational	activities within these		
	- Critical (Major) compliance -	areas.	prombit operational	activities within these		
				hat appropriate buffers		
				and independent estate		
		management indicated that they are well-trained and aware of the importance of maintaining proper buffers and prohibiting operational activities, including agrochemicals and fertilize applications, along these buffers. There was no evidence of rubbis				
		or waste polluting the				
		water sources are used for consumption and cleaning by the		and cleaning by the		
		community, the smallholders ensure that the water remains clean.				
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand	Under environmental permit [EP-L2 (411)], parameter limit set for both surface water discharge and land discharge which to be carried				
	(BOD), is regularly monitored.	out on monthly basis.				
	- Minor compliance -	Environmental Imp				
		Parameter	Surface Water	Land Discharge		
			Discharge			
		pH	5-9	5-9		
		Total Solid	1500	3000		
		Total Dissolved	1000	2000		
		Solid				
		Total Suspended	500	1000		
		Solid				



Oil and Grease	50	50
BOD ₅	90	4000

Example of analysis results for effluent discharge and EIP point for NBPOL mills as per below.

Mosa POM

Method of discharge is waterways and monthly analysis results for the last 2 months summarized as per following:

Parameter	July 2024	June 2024	May 2024
рН	6.5	6.9	7.5
Total Solid	270	320	330
Total Dissolved Solid	260	320	330
Total Suspended Solid	14	8	2
Oil and Grease	10	5	17
BOD ₅	3	1	2

The effluent analysis reports show that overall BOD results generally meet the discharge limits. When results occasionally exceed the limits, the mill initiates investigations to determine the root cause and implements appropriate action plans. These investigations and corrective actions are documented in the E-SHEQ001 Incident Form, which was available for verification.

7.8.4	Mill water use per tonne of FFB is monitored and recorded Minor compliance -	Water consumptions at all mills a Based on the records, the sample	Complied		
		Month	Mill water / FFB Est: 0.80		
		Jan 2024	0.68		
		Feb 2024	0.69		
		Mar 2024	0.70		
		Apr 2024	0.68		
		May 2024	0.68		
		June 2024	0.65		
Criterio	on 7.9: Efficiency of fossil fuel use and the use of renewable energy is optin	nised			
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported. - Minor compliance -	The monitoring of environment electricity generated by steam tu years 2023 and 2024. This is meat ton of crude palm oil (kWh/mt CP by turbines that power the entire	Complied		
		Monthly records of energy consu- non-renewable sources are main is used to optimize the use of re- control energy consumption. The	umption from both renewable and tained and documented. This data enewable energy and to track and goal is to gradually reduce reliance fficiency over time. The compiled		
		Month	Diesel / FFB Est: 0.03		
		Jan 2024	0.03		
		Feb 2024	0.04		

		1-1	1 1		
		Mar 2024	0.03		
		Apr 2024	0.04		
		May 2024	0.06		
		June 2024	0.04		
		The high data against estimate maintenance activities	e due to low crop process and		
	The electricity energy monitoring based on CPO produced tabulate as shown below:				
		Month	Electricity / FFB Est: 28.82		
		Jan 2024	18.52		
		Feb 2024	19.69		
		Mar 2024	19.30		
		Apr 2024	20.24		
		May 2024	26.91		
ı		June 2024	17.31		
	n 7.10: Plans to reduce pollution and emissions, including greenhouse gate to minimise GHG emissions.	ases (GHG), are developed, imple	mented and monitored and new de	velopments are	
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	The main sources of greenhouse methane (CH ₄) from palm oil memissions from the boiler stack GHG emissions include carbon meand nitrogen oxides (NOx), which and fertilizer applications, and es	Complied		

		The emission values are recorded and calculated using the RSPO Palm GHG Calculator, version 4. Detailed calculations of GHG emissions are documented in Appendix B and reported for each palm oil mill. There is peat oxidation data in GHG since Mosa POM was received crop diversion from Tamare Estate. Crop diversion due to Numondo POM having maintenance.	
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	Not applicable since no new development by the certification unit.	Not Applicable
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored - Critical (Major) compliance -	An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Identification of Potential Source of GHG Emission and GHG Reduction Plan is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. Among the Potential Source of GHG Emission identified such as Palm Oil Mill Effluent (POME), Diesel Usage, Electricity Usage, Chemical Usage and Generator Set. All pollutants are identified through environmental aspect register and plans to reduce or minimize are compiled in the Continuous Improvement Plan 2014-2025.	Complied
Criterio	n 7.11: Fire is not used for preparing land and is prevented in the manage	ed area	
7.11.1	(C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable



7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
	on 7.12: Land clearing does not cause deforestation or damage any area represt. HCVs and HCS forests in the managed area are identified and protect		gh Carbon Stock
7.12.1	(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. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document - Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.12.2	 (C) HCVs, HCS forests and other conservation areas are identified as follows: 7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. 7.12.2b Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. PROCEDURAL NOTE: 	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
	PROCEDURAL NUIE:		

	For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments. - Critical (Major) compliance -		
7.12.3	(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi- stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
	PROCEDURAL NOTE:		
	There shall be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development shall be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land/ plantations. All other P&C requirements apply, including FPIC and HCV requirements. - Critical (Major) compliance -		
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peat land and other conservation areas within Company managed land 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) that may result from the actions of the Unit of Certification. - Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
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	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable



	agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -		
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
	Smallholder requirements:		
	Organization managing the smallholders to educate and support Smallholders through field days and visits to Smallholder blocks as part of their routine extension activities.		
	- Minor compliance -		
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	Not applicable since Mosa Palm Oil Mill only received from certified smallholders that managed by Smallholder Affair Department (SHA), NBPOL.	Not Applicable



Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **SD Guthrie Mosa POM NBPOL** 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 2023 for NBPOL WNB Mosa POM and supply base are as following:

Emission per product	tCO₂e/tProduct
СРО	1.11
PKO	1.11

Extraction	%
OER	21.51
KER	6.26

Production	t/yr		
FFB Process	304,827.08		
CPO Produced	65,579.48		
PKO Produced	19,070.60		

Land Use	На	
OP Planted Area		65,990.26
OP Planted on peat		950.59
Conservation (forested)		7,448.30
Conservation (non-forested)		0.00
	Total	74,389.15

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO₂e	tCO₂e / FFB	tCO ₂ e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	475370.57	5.92	0.00	0.00	19998.17	0.00	495368.74	-
CO ₂ Emission from fertilizer	16464.08	0.21	0.00	0.00	402.86	0.00	16866.94	-
NO ₂ Emission	17558.01	0.22	0.00	0.00	522.49	0.00	18080.50	-
Fuel Consumption	1900.05	0.02	0.00	0.00	3408.16	0.00	5308.21	-
Peat Oxidation	51902.22	0.65	0.00	0.00	0.00	0.00	51902.22	-
Sink								
Crop Sequestration	-304747.56	-7.91	0.00	0.00	142345.52	0.00	-447093.08	-
Conservation Sequestration	-65752.99	-1.71	0.00	0.00	0.00	0.00	-65752.99	-
Total	199810.26	5.19	0.00	0.00	-118013.83	0.00	81796.42	-

*Note: Includes both estates and smallholders



Summary of Mill Emission and Credit

	tCO₂e	tCO ₂ e/tFFB
Emission		·
POME	9275.50	0.03
Fuel Consumption	2562.49	0.01
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	11,837.99	0.04

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
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			

POME Diverted to Anaerobic Digestion:					
Divert to anaerobic pond (%)	0.00				
Divert to methane captured (flaring) (%)	0.00				
Divert to methane captured (energy generation) (%)	100				



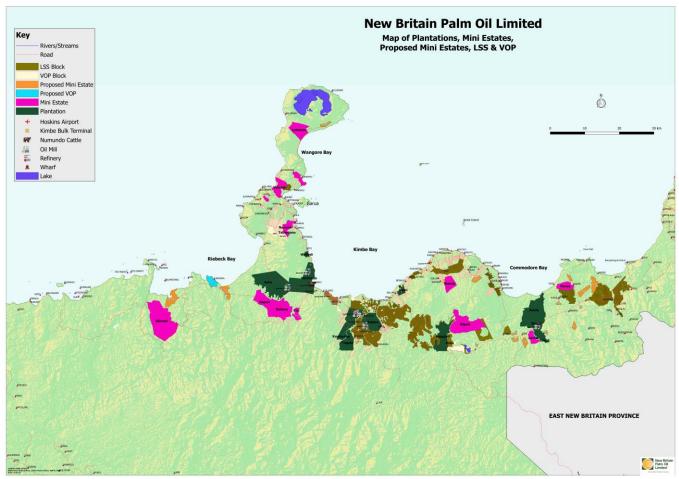
Appendix C: Location Map of Certification Unit and Supply bases

Mosa Palm Oil Mill





Smallholder map by division







Appendix D: Estate Field Map

Not applicable



Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other: N/A
Risk Factor Applied	1.2 (medium risk)	N/A	N/A
Justification of Risk Factor Applied	Annual surveillance audit 3_1 and all smallholder managed under Small holder affair (SHA) department by NBPOL	N/A	N/A
Number of samples	92	N/A	N/A
Remarks	Including community planting and independent estate	N/A	N/A

No	Name of	Location	GPS Refe	rence	Area Summ	nary (Ha)	Forecasted		Smallholder
	farmer		Latitude	Longitude	Total Certified Area	Planted Area	annual FFB Production (MT)	joining	ID
1	FIDELIS DILU	GALAI LSS	150° 21' 56.80" E	5° 38' 27.20" S	6.73	6.5	91.65	1984	005-1480
2	ALPHONSE WELE	GALAI LSS	150° 22' 05.23" E	5° 39' 33.73" S	8.03	7.12	100.39	1984	005-1537
3	NOLAI KAUPA	GALAI LSS	150° 21' 56.40" E	5° 39' 39.98" S	7.28	5.43	76.56	1984	005-1542
4	JACK TULUTIA	GALAI LSS	150° 24' 24.33" E	5° 39' 28.51" S	6.44	6.34	89.39	1986	005-1584
5	DEMANU DUANIS	GALAI LSS	150° 24' 40.75" E	5° 40' 27.24" S	6.44	6.34	89.39	1986	005-1623
6	KOLAI MUI KAMANE	GALAI LSS	150° 21' 45.93" E	5° 38' 29.66" S	6.5	6.42	90.52	1984	005-1481
7	JUNIAS T. NAMETE	GALAI LSS	150° 23' 16.35" E	5° 40' 18.38" S	6.73	6.5	91.65	1999	005-0026
8	CHROBIM VITUS	GALAI LSS	150° 23' 17.12" E	5° 40' 17.85" S	7.51	7.32	103.21	1984	005-0012
9	DORIS ROA	BULUMA VOP	150° 19' 00.61" E	5° 33' 32.70" S	1.69	1.69	20.28	2007	011-0029
10	BARNABAS GAVA	BULUMA VOP	150° 18' 57.03" E	5° 33' 29.24" S	3.46	3.46	41.52	2000	011-0031
11	FREDRICK KOSI	BULUMA VOP	150° 19' 10.25" E	5° 33' 26.71" S	5.4	4.49	53.88	1984	011-0038
12	JOE LUWETA	BULUMA VOP	150° 19' 15.31" E	5° 33' 36.49" S	3.5	3.45	41.41	1998	011-0040
13	SCHOLLY KAIPU	BULUMA VOP	150° 19' 21.86" E	5° 33' 43.74" S	1.86	1.86	22.32	2003	011-0042
14	ALBERT TAMAI	BULUMA VOP	150° 19' 22.19" E	5° 33' 49.23" S	2.35	1.80	21.6	1997	011-0043
15	ANNA LOBE	BULUMA VOP	150° 19' 10.77" E	5° 33' 45.09" S	3.45	3.45	41.4	2000	011-0046



No	Name of	Location	GPS Reference		Area Summary (Ha)		Forecasted	Date of	Smallholder
	farmer		Latitude	Longitude	Total Certified Area	Planted Area	annual FFB Production (MT)	joining	ID
16	R. BELEKE	BULUMA VOP	150° 19' 03.96" E	5° 33' 30.67" S	2.09	2.09	25.08	2007	011-0049
17	PHILIMON.S	BULUMA VOP	150° 19' 01.16" E	5° 33'25.87" S	2.22	2.22	26.64	2007	011-0050
18	MOE HARO	BULUMA VOP	150° 18' 52.89" E	5° 33'18.58" S	6.02	6.02	72.24	1998	011-0052
19	K. HARO	BULUMA VOP	150° 18' 52.52" E	5° 33' 13.00" S	2.22	2.22	26.64	2002	011-0053
20	JOAN SOGI	BULUMA VOP	150° 19' 29.34" E	5° 33' 50.01" S	1.81	1.81	21.72	2007	011-0160
21	ALOIS BERA	BULUMA VOP	150° 18'49.38" E	5° 33' 15.04" S	1.28	1.28	15.36	2001	011-0116
22	PIUS MALILA	MAI VOP	150° 17' 54.34" E	5° 33' 43.55" S	1.89	1.89	37.8	1996	014-0002
23	PAUL BEHO	MAI VOP	150° 17' 52.09" E	5° 33' 53.20" S	5.39	5.04	100.8	1984	014-0003
24	EVAL MABUBU	MAI VOP	150° 17' 48.47" E	5° 34' 08.08" S	4.1	3.89	77.2	1996	014-0005
25	TIMOTHY TOMMY	MAI VOP	150° 17' 50.89" E	5° 34' 21.47" S	2.81	2.81	56.2	1984	014-0009
26	BERNARD MARE	MAI VOP	150° 17' 51.10" E	5° 34' 31.14" S	4.18	3.94	78.8	2000	014-0013
27	T. BAUVI	MAI VOP	150° 17'58.29" E	5° 34' 33.03" S	2.19	1.94	38.8	1984	014-0015
28	P.MOI	MAI VOP	150° 18' 04.82" E	5° 34' 33.17" S	3.34	3.01	60.2	1987	014-0016
29	JACK LUMA	MAI VOP	150° 18' 10.46" E	5° 34' 35.88" S	4.26	3.86	77.2	1987	014-0017
30	EMMANULE B. RAUSI	MAI VOP	150° 17' 51.63" E	5° 34' 23.16" S	2.05	2.05	41	1994	014-0012
31	PAUL LEKA	MAI VOP	150° 18' 19.65" E	5° 33'52.60" S	2.36	2.36	47.2	1987	014-0020
32	BEN DEDE	MAI VOP	150° 18' 23.12" E	5° 33' 54.82" S	2.27	2.27	45.4	1986	014-0021
33	KAVOA BEHO	MAI VOP	150° 17' 55.04" E	5° 34'07.52" S	4.32	3.94	78.8	1997	014-0007
34	WILLY BATARI	MAI VOP	150° 18' 53.37" E	5° 34' 07.46" S	1.88	1.88	37.6	1988	014-0090
35	CHRIS GA'A	VAVUA VOP	150° 34' 10.29" E	5° 31' 29.95" S	2.05	2.05	22.55	1997	043-0003
36	THOMAS REKI	VAVUA VOP	150° 33' 52.58" E	5° 31' 37.98" S	2.64	2.64	29.04	1997	043-0007
37	VALERIEN TEU	VAVUA VOP	150° 33' 33.34" E	5° 31' 35.37" S	1.71	1.71	18.81	2000	043-0035
38	RANSON KAORE	VAVUA VOP	150° 33' 29.48" E	5° 31' 46.52" S	2.33	2.33	25.63	2000	043-0042
39	THADEUS MALAI	VAVUA VOP	150° 33' 26.15" E	5° 31' 58.06" S	1.34	1.34	14.74	2000	043-0053
40	THADEUS BARA JNR	VAVUA VOP	150° 33' 20.00" E	5° 32' 02.54" S	1.25	1.25	13.75	2000	043-0057
41	LEONARD SAULATALA	VAVUA VOP	150° 33' 42.54" E	5° 31' 43.89" S	3.34	3.34	36.74	2000	043-0019



No	Name of	Location	GPS Reference		Area Summary (Ha)		Forecasted	Date of	Smallholder
	farmer		Latitude	Longitude	Total Certified Area	Planted Area	annual FFB Production (MT)	joining	ID
42	DANIEL META	VAVUA VOP	150° 33' 24.38" E	5° 31' 52.89" S	2.45	2.45	26.95	2000	043-0055
43	BEN TOVILLY	VAVUA VOP	150° 33' 38.86" E	5° 31' 52.51" S	3.34	3.34	36.74	2000	043-0025
44	GREY BERA	VAVUA VOP	150° 33' 01.71" E	5° 32' 28.89" S	2.04	2.04	22.44	2000	043-0111
45	MELCHIOR BABO	VAVUA VOP	150° 33'50.78" E	5° 31' 57.41" S	3.22	3.22	35.42	1997	043-0014
46	ALOIS DALA	VAVUA VOP	150° 33' 46.96" E	5° 31' 31.59" S	1.69	1.69	18.59	1998	043-0009
47	BLASIUS SESEGA	VAVUA VOP	150° 33'48.49" E	5° 31' 41.08" S	1.67	1.67	18.37	2000	043-0015
48	ANSEMUS RURU	VAVUA VOP	150° 33'29.66" E	5° 32' 03.07" S	1.85	1.85	20.35	2000	043-0061
49	VINCENT GELU	KOIMUMU VOP	150° 34'22.58" E	5° 31' 36.29" S	2.00	2.00	26	1997	039-0006
50	EMIL GAA	KOIMUMU VOP	150° 34'51.11" E	5° 31' 56.68" S	1.96	1.96	25.48	1997	039-0023
51	PAUL BUBU	KOIMUMU VOP	150° 34'51.81" E	5° 32' 31.92" S	2.04	2.04	26.52	1997	039-0041
52	JOHN SARERE	KOIMUMU VOP	150° 34'09.44" E	5° 31' 41.47" S	2.41	2.41	31.33	1995	039-0132
53	HENDRY SESEGA	KOIMUMU VOP	150° 34'12.25" E	5° 31' 47.79" S	2.25	2.25	29.25	1996	039-0116
54	PENNY SOLLY	KOIMUMU VOP	150° 34'57.88" E	5° 32' 53.67" S	1.98	1.98	25.74	2012	039-0149
55	COSMAS GAA	KOIMUMU VOP	150° 34'50.04" E	5° 31' 53.90" S	2.07	2.07	26.91	1997	039-0022
56	PETER TAPOI	KOIMUMU VOP	150° 34'58.84" E	5° 32' 30.34" S	1.80	1.80	23.4	1997	039-0044
58	PAUL KAIWA	KOIMUMU VOP	150° 34'17.98" E	5° 31' 42.32" S	1.59	1.59	20.67	1998	039-0107
59	CAROL TAUKOMO	KOIMUMU VOP	150° 34'58.13" E	5° 32' 14.32" S	2.15	2.15	27.95	2000	039-0074
60	TONY GALOA	KOIMUMU VOP	150° 34'43.23" E	5° 32' 24.59" S	2.55	2.55	33.15	1997	039-0070
61	BIBIANA MARISA	KOIMUMU VOP	150° 34'22.27" E	5° 31' 50.92" S	1.53	1.53	19.89	1997	039-0092
62	MICHEAL VAVALA	KOIMUMU VOP	150° 34'51.95" E	5° 32' 16.68" S	1.93	1.93	25.09	1997	039-0037
63	LUKAS RAKA	MOROKEA VOP	150° 10' 28.68" E	5° 36' 45.47" S	6.54	4.48	64.51	1997	016-0004
64	EDDY KURA	MOROKEA VOP	150° 10' 19.41" E	5° 37' 01.45" S	4.38	3.62	52.13	1996	016-0006



No	Name of	Location	GPS Refe	rence	Area Sumn	nary (Ha)	Forecasted	Date of	Smallholder
	farmer		Latitude	Longitude	Total Certified Area	Planted Area	annual FFB Production (MT)	joining	ID
65	MICHEAL GUAN	MOROKEA VOP	150° 10' 10.70" E	5° 37' 31.99" S	4.45	4.17	60.05	2006	016-0015
66	GABRIEL BATARI	MOROKEA VOP	150° 10' 37.14" E	5° 35' 35.19" S	5.28	4.91	70.71	1984	016-0055
67	ANNA THOMAS	MOROKEA VOP	150° 11' 01.59" E	5° 35' 22.53" S	2.6	2.39	34.42	1984	016-0074
68	ASEK MENA	MOROKEA VOP	150° 10' 30.84" E	5° 37' 14.86" S	2.09	1.86	26.78	2003	016-0239
69	WENCIS AMBROSE	MOROKEA VOP	150° 10' 47.08" E	5° 36' 30.80" S	2.48	2.21	31.82	2001	016-0257
70	DAPE YUPEI	MOROKEA VOP	150° 11' 05.24" E	5° 34' 57.40" S	7.09	6.60	95.04	1997	016-0041
71	THOMAS NONGI	MOROKEA VOP	150° 10' 24.10" E	5° 35' 52.20" S	1.8	1.74	25.06	2002	016-0119
72	ANTON YAMBA	MOROKEA VOP	150° 10' 22.72" E	5° 35' 24.11" S	2.21	2.16	31.10	2004	016-0375
73	JOSEPH YAKALI	MOROKEA VOP	150° 10' 15.69" E	5° 37'09.90" S	4.4	4.24	61.06	2002	016-0007
74	PETER WAYU	MOROKEA VOP	150° 11'04.19" E	5° 35' 01.44" S	1.74	1.72	24.77	1984	016-0044
75	PAULINA MAI	MOROKEA VOP	150° 10' 04.98" E	5° 37' 19.84" S	2.15	1.97	28.37	1996	016-0092
76	SAMUEL SAULE	HARK VOP	150° 09' 11.42" E	5° 39' 48.20" S	1.94	1.94	25.22	2001	066-0012
77	SEPRIEN SAUN	HARK VOP	150° 09'29.32" E	5° 39' 48.96" S	1.7	1.59	20.67	2000	066-0008
78	BERNARD DUMU	HARK VOP	150° 09' 29.91" E	5° 39' 53.34" S	2.48	2.48	32.24	2002	066-0017
78	PHILEMON PUKAM	HARK VOP	150° 09' 09.77" E	5° 40' 01.72" S	3.9	2.92	37.96	2002	066-0023
80	JAMES MANAGEN	HARK VOP	150° 10' 09.89" E	5° 39' 41.58" S	1.81	1.73	22.49	2005	066-0054
81	PAUL TABUKAUIN	HARK VOP	150° 09' 44.23" E	5° 40' 41.56" S	1.44	1.36	17.68	2005	066-0055
92	KOMAS JAMES	HARK VOP	150° 09' 09.11" E	5° 39' 54.18" S	1.24	1.19	15.47	2000	066-0013
83	JEROMI MEFORA	HARK VOP	150° 09' 04.32" E	5° 39' 57.14" S	2.01	1.98	25.74	2003	066-0058
84	JOHN ARI	HARK VOP	150° 09' 40.44" E	5° 40' 11.54" S	2.11	2.06	26.78	2007	066-0061
85	JOHN HAKAU	HARK VOP	150° 09' 48.76" E	5° 40' 14.22" S	2.21	1.67	21.71	2004	066-0056
86	SIMON UNAMU	HARK VOP	150° 09' 35.38" E	5° 39' 59.74" S	3.33	2.61	33.93	2014	066-0069
87	MICHEAL TOM	HARK VOP	150° 09' 39.68" E	5° 40' 00.79" S	1.19	1.10	14.3	2000	066-0008



No	Name of	Location	GPS Reference		Area Summary (Ha)		Forecasted	Date of	Smallholder
	farmer		Latitude	Longitude	Total Certified Area	Planted Area	annual FFB Production (MT)	joining	ID
88	SIMON TUMONA	HARK VOP	150° 09' 29.01" E	5° 39' 42.24" S	2.08	2.01	26.13	2000	066-0007
89	AKAMI ESTATE	BUBU	150° 28' 17.01" E	5° 40' 03.00" S	262.17	219.48	3980	2001	058-0001
90	MAKASILI OIL PALM COOPERATIVE SOCIETY	MAKASILI	150° 33' 54.013" E	5° 29' 49.45" S	20.5	20.5	108	1997	287-0001
91	MAPAKAKEA COOMUNITY OIL PALM SOCIETY	KOIMUMU	150° 33' 58.49" E	5° 32' 33.98" S	192.21	31.11	170	2012	281-0001
92	MASALIKILIKI COMMUNITY PLANTING	KOIMUMU	150° 35' 06.71" E	5° 31' 22.98" S	21.26	21.26	513	2012	286-0001
				Total	762.02	542.93	8318.49		

Note: 92 smallholders has been sampled including community planting



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