

# RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

| □ Initial Assessment                           |
|--|
|  |
| ☐ Recertification Assessment (Choose an item.) |
| □ Extension of Scope                           |

# Client Company Name / Parent Company: IOI Corporation Berhad

Client Company / Parent Company Address: IOI City Tower 2, Lebuh IRC, IOI Resort City 62502 Putrajaya, Malaysia

Certification Unit:

Dynamic Plantations Bhd - Gomali Palm Oil Mill

Location of Certification Unit: 5th Mile, Jalan Gemas-Batu Anam, Batu Anam, Segamat 85100, Johor, Malaysia.

Date of Final Report: 01/08/2024



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| • •             | : List of Abbreviations  |             |
| , the circuit i | List of Assistance and Assistance an |             |



#### **Section 1: Scope of the Assessment**

| 1. Company Details  | 1. Company Details  |                 |                  |               |  |
|---|---|-----------------|------------------|---------------|--|
| Parent Company  | IOI Corporation Berhad  |                 |                  |               |  |
| RSPO Membership Number                                      | 2-0002-04-000-00  | Membership      | Approval Date    | 17/05/2004    |  |
| Address   | Head Office: IOI City Tower 2, Lebuh IRC, IOI Resort City, 62502 Putrajaya, Malaysia. |                 |                  |               |  |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | Dynamic Plantations Bhd - Gomali Palm Oil Mill  |                 |                  |               |  |
| Location / Address  | 5th Mile, Jalan Gemas-Batu Anam,  | , Batu Anam, Se | gamat 85100, Joh | or, Malaysia. |  |
| Website   | www.ioigroup.com  |                 |                  |               |  |
| Management Representative                                   | Mr Agos Bin Atan <b>E-mail</b> agos@ioigroup.com                                      |                 |                  |               |  |
| Telephone   | +603-89478888 (Head Office)<br>+607-9497276 (Sustainability<br>Department)            | Facsimile       | N/A              |               |  |

| 2. Certification Information            | 2. Certification Information  |                       |               |                 |                   |  |
|---|---|-----------------------|---------------|-----------------|-------------------|--|
| Certificate Number                      | RSPO 727112   | <b>Certificate St</b> | art Date      | 23/08/202       | 20                |  |
| <b>Date of First Certification</b>      | 23/08/2010  | Certificate Ex        | piry Date     | 22/08/202       | 25                |  |
| Scope of Certification                  | Production of Sustainable Cru   | ude Palm Oil (CP      | O) and Palm K | ernel (PK)      |                   |  |
| Visit Objectives                        | Determination of the conformation audit criteria.                                 | mity of the clien     | t's managemer | nt system, or   | parts of it, with |  |
|   | Evaluation of the ability of<br>meets applicable statutory, re                    | _                     | •             |                 | ent organization  |  |
| Assessment Cycle                        | ☐ Pre Assessment (Choose  | an item.)             |               |                 |                   |  |
|   | ☐ Initial Assessment  |                       |               |                 |                   |  |
|   | ⋈ Annual Surveillance Asses   | sment (ASA 2_4)       | )             |                 |                   |  |
|   | ☐ Recertification Assessment  | t (Choose an ite      | em.)          |                 |                   |  |
|   | ☐ Scope Extension   |                       |               |                 |                   |  |
| Applicable Standards /                  | RSPO Certification System fo  | r P&C and RSPO        | ISH 2020      |                 |                   |  |
| Normative Reference                     | ⋈ Malaysia National Interpretation  | etation 2019 of th    | ne RSPO P&C 2 | 2018            |                   |  |
| <b>Supply Chain Module</b>              | ☑ Identity Preserved; ☐ Ma  | ss Balance Mil        | l Capacity    | 120 MT/         | Hour              |  |
| 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 E |                       |               | udit (Option B) |                   |  |
| 3. Other Certifications                 |   |                       |               |                 |                   |  |
| Certificate Number                      | Standard(s)   |                       | Certificate   | Issued by       | Expiry Date       |  |



| MSPO 727190                     | MSPO MS 2530-3:2013 – General Principles for Oil<br>Palm Plantations and Organized Smallholders | BSI Services (M) Sdn          | 09/09/2028 |
|---------------------------------|---|-------------------------------|------------|
| MSPO 727189                     | MSPO MS 2530-4:2013 – General Principles for Palm<br>Oil Mills                                  | Bhd                           | 09/09/2028 |
| MSPO 727219                     | MSPO Supply Chain Certification Standard 2018   |                               | 28/08/2024 |
| EU-ISCC-Cert-ID218-<br>20230200 | ISCC EU   | PT Intertek Utama<br>Services | 31/08/2024 |
| ISO 45001:2018                  | ISO 45001:2018  | NIOSH Certification           | 20/06/2026 |

| 4. Location(s) of Mill & Supply Bases                  |   |                                 |  |  |  |  |
|--|---|---------------------------------|--|--|--|--|
| Name   | Location  | GPS Coordinates                 |  |  |  |  |
| (Mill / Supply Base / Group<br>Manager / Smallholders) |   | Latitude Longitude              |  |  |  |  |
| Gomali POM   | 5th Mile, Jalan Gemas-Batu Anam, K.B. N<br>102, 85100 Segamat, Johor, Malaysia. | o. 2°36'38.47"N 102°40'45.98"E  |  |  |  |  |
| Gomali Estate  | Jalan Gemas-Batu Anam, K.B. No. 10<br>85100 Segamat, Johor, Malaysia.           | 2, 2°36'41.07"N 102°40'24.00"E  |  |  |  |  |
| Paya Lang Estate                                       | Batu Anam, 85100 Segamat, Joho<br>Malaysia.                                     | or, 2°34'56.06"N 102°42'27.06"E |  |  |  |  |
| Tambang Estate   | Tambang Estate, Batu Anam, Segam<br>85100 Johor, Malaysia.                      | at 2°37'55.01"N 102°42'59.01"E  |  |  |  |  |
| Sagil Estate   | 8 Milestone, Jalan Tangkak-Segamat, 8490<br>Tangkak, Johor, Malaysia            | 00 2°18'54.01"N 102°38'04.09"E  |  |  |  |  |
| Regent Estate  | 2nd Mile, Jalan Batang Melaka, 7320<br>Gemencheh, Negeri Sembilan, Malaysia     | 00 2°30'50.06"N 102°24'16.08"E  |  |  |  |  |
| Bahau Estate   | Batu 5, Jalan Bahau-Rompin, 72100 Baha<br>Negeri Sembilan, Malaysia.            | u, 2°48'32.06"N 102°26'55.04"E  |  |  |  |  |
| Kuala Jelei Estate                                     | 5KM, Jalan Tampin, 72109 Bahau, Nege<br>Sembilan, Malaysia                      | eri 2°46'28.04"N 102°23'23.01"E |  |  |  |  |
| Bertam Estate  | Flora Horizon Sdn Bhd, Bertam Estat<br>76100 Durian Tunggal, Melaka, Malaysia.  | re, 2°18'14.05"N 102°17'05.06"E |  |  |  |  |
| Jasin Lalang Estate                                    | Air Merbau, Jalan Jasin Bemban, Jas<br>Melaka, Malaysia                         | sin 2°15'16.09"N 102°25'16.03"E |  |  |  |  |
| Bukit Dinding Estate                                   | 1 1/2 Miles, Jalan Mentakab, 28600 Kara<br>Pahang.                              | ık, 3°23'28.05"N 102°04'31.08"E |  |  |  |  |
| Bukit Serampang Estate                                 | KM 12, Jalan Sagil –Tangkak, 8490<br>Tangkak, Johor                             | 00 2°19′25.40″N 102° 41′17.40″E |  |  |  |  |
| 5. Description of Supply B                             | 5. Description of Supply Base   |                                 |  |  |  |  |
| New Planting Development                               | ⊠ No  | □ Yes                           |  |  |  |  |



| Estate / Smallholders  | Total Planted<br>(Mature +<br>Immature)<br>(ha) | HCV<br>(ha) | Infrastructure<br>& Other<br>(ha) | Total Area<br>(ha) | % of<br>Planted |
|------------------------|---|-------------|-----------------------------------|--------------------|-----------------|
| Gomali Estate          | *2,169.00                                       | 4.25        | ***381.67                         | 2,555.02           | 84.89           |
| Paya Lang Estate       | *1,191.00                                       | 2.51        | ***1,271.75                       | 2,465.26           | 48.31           |
| Tambang Estate         | *1,171.00                                       | 0.94        | ***834.37                         | 2,006.31           | 58.37           |
| Sagil Estate           | *1,147.00                                       | **7.62      | ***1,350.37                       | 2,504.99           | 45.79           |
| Regent Estate          | 2,121.00  | 2.72        | 176.49                            | 2,300.21           | 92.21           |
| Bahau Estate           | *2,630.00                                       | 3.16        | ***196.55                         | 2,829.71           | 92.94           |
| Kuala Jelei Estate     | 631.00  | 2.68        | ***45.22                          | 678.90             | 92.94           |
| Bertam Estate          | 309.00  | 0.00        | 32.98                             | 341.98             | 90.36           |
| Jasin Lalang Estate    | *664.00   | 0.35        | **50.94                           | ***715.29          | 92.83           |
| Bukit Dinding Estate   | 1,445.00  | 46.82       | 168.61                            | 1,660.43           | 87.03           |
| Bukit Serampang Estate | *2,003.00                                       | **9.82      | ***712.31                         | 2,725.13           | 73.50           |
| Total                  | 15,481.00                                       | 80.87       | 5,221.36                          | 20,783.23          |                 |

#### Note:

- 1) Gomali Estate
  - \* Reduction of 2 ha of planted from the conversion of Oil Palm to Coconut
  - \*\*\* Increase of 1.27 ha due to 0.73 ha was taken by TNB land acquisition Paya Lang Estate
  - \* Reduction of 369 ha of Oil Palm convert to Coconut
  - \*\*\* Increase of 367.01 ha due to 1.99 ha was taken by TNB land acquisition Tambang Estate
  - \* Reduction of 385 ha of Oil Palm convert to Coconut
  - \*\*\* Increase of 380.61 ha due to 4.39 ha was taken by TNB land acquisition

Gomali Estate, Tambang Estate And Paya Lang Estate shared land title.

- 2) Sagil Estate
  - \*Reduce 174 ha due to change of oil palm to coconut planting
  - \*\*Increase 0.04ha for river due to the GIS remapping
  - \*\*\*increase 173.99 ha due to crop from oil palm to coconut and others crop
- 3) Kuala Jelei Estate
  - \*\*\* reduce 0.36 ha due to government take over for road reserve due to new title Lot 4644-8
- 4) Jasin Lalang Estate
  - \*planted area reduce 30ha due land disposal on Lot 7001 to the third party
  - \*\* reduced 2.14ha due to the roads remapping due to the land disposal on Lot 7001.



\*\*\* reduce 32.14 Ha area computation adjustment after GIS remapping due land disposal on Lot 7001 to the third party and land acquired by government 0.0138 ha for road reserve.

#### 5) Bahau Estate

- \*increase 1ha due to oil palm replanting
- \*\*\*reduce 9.78 ha of land title hectare is due to area computation adjustment after GIS remapping based on latest land title.
- 6) Bukit Serampang Estate
  - \* reduce 123 ha planted hectarage due to replanting of oil palm to coconut planting
  - \*\*increase 0.12 ha of river based on updated river in replanting area from current UAV imagery
  - \*\*\* increase 122.89 ha due to change of crop from oil palm to coconut

| 6. Plantings & Cycle   |                  |          |          |        |           |          |
|------------------------|------------------|----------|----------|--------|-----------|----------|
| Estate / Smallholders  | Age (Years) - ha |          |          |        | Mature    | Immature |
|                        | 0 - 3            | 4 - 14   | 15 - 25  | >25    |           |          |
| Gomali Estate          | 627.00           | 673.00   | 867.00   | 2.00   | 1,542.00  | 627.00   |
| Paya Lang Estate       | 13.00            | 893.00   | 285.00   | 0.00   | 1,178.00  | 13.00    |
| Tambang Estate         | 0.00             | 586.00   | 399.00   | 186.00 | 1,171.00  | 0.00     |
| Sagil Estate           | 35.00            | 704.00   | 408.00   | 0.00   | 1,112.00  | 35.00    |
| Regent Estate          | 377.00           | 941.00   | 803.00   | 0.00   | 1,744.00  | 377.00   |
| Bahau Estate           | 483.00           | 1,119.00 | 1,019.00 | 9.00   | 2,147.00  | 483.00   |
| Kuala Jelei Estate     | 127.00           | 82.00    | 422.00   | 0.00   | 504.00    | 127.00   |
| Bertam Estate          | 0.00             | 0.00     | 309.00   | 0.00   | 309.00    | 0.00     |
| Jasin Lalang Estate    | 0.00             | 265.00   | 0.00     | 399.00 | 664.00    | 0.00     |
| Bukit Dinding Estate   | 0.00             | 547.00   | 825.00   | 73.00  | 1,445.00  | 0.00     |
| Bukit Serampang Estate | 0.00             | 514.00   | 1,165.00 | 324.00 | 2,003.00  | 0.00     |
| Total (ha)             | 1,662.00         | 6,324.00 | 6,502.00 | 993.00 | 13,819.00 | 1,662.00 |

| 7. Summary of Certified Tonnage of FFB (Own Certified Scope) |   |   |   |           |
|--|---|---|---|-----------|
| Estate / Tonnage (MT) / year                                 |   |   |   |           |
| Smallholders   | Estimated last year<br>(Aug 23 – July 24) | Act<br>(May 23                                | Forecast<br>(Aug 24 – July 25)              |           |
|  |   | Previous license period<br>(May 23 – July 23) | Current license period<br>(Aug 23 – Apr 24) |           |
| Gomali Estate  | 33,697.00                                 | 6,448.79                                      | 21,266.58                                   | 35,732.00 |



| Total                  | 289,164.00 | 280,633.49 |           | 302,486.00 |
|------------------------|------------|------------|-----------|------------|
| Bukit Serampang Estate | 21,069.00  | 7,401.56   | 21,448.49 | 27,778.00  |
| Bukit Dinding Estate   | 34,950.00  | 5,590.67   | 22,784.69 | 33,410.00  |
| Jasin Lalang Estate    | 12,500.00  | 3,369.18   | 9,309.75  | 12,000.00  |
| Bertam Estate          | 8,374.00   | 1,763.81   | 7,737.80  | 8,460.00   |
| Kuala Jelei Estate     | 12,740.00  | 3,099.90   | 10,847.88 | 12,740.00  |
| Bahau Estate           | 55,456.00  | 10,407.75  | 35,724.26 | 59,213.00  |
| Regent Estate          | 35,967.00  | 8,714.60   | 26,094.41 | 39,185.00  |
| Sagil Estate           | 18,640.00  | 6,535.34   | 19,194.60 | 25,580.00  |
| Tambang Estate         | 20,021.00  | 6,457.20   | 18,494.27 | 21,516.00  |
| Paya Lang Estate       | 35,750.00  | 5,365.01   | 22,576.95 | 26,872.00  |

#### Note:

- **1. Gomali Estate**: The yield per hectare decreasing as Gomali Estate carry out a major replanting program for the following forecast year.
- **2. Bukit Serampang Estate :** The yield per hectarage reducing as the estate will change their crop from Oil Palm to Coconut for next for forecast year.

| 8. Summary of Certified Tonnage of FFB (from other certified unit(s)) |   |   |   |  |  |
|---|---|---|---|--|--|
| Estate /  | Tonnage (MT) / year                       |   |   |  |  |
| Smallholders  | Estimated last year<br>(Aug 23 – July 24) |   | Actual<br>(May 23 - Apr 24)                 |  |  |
|   |   | Previous license period<br>(May 23 – July 23) | Current license period<br>(Aug 23 – Apr 24) |  |  |
| Segamat Estate  |   | 0.00  | 2088.72                                     |  |  |
| Pukin Estate  |   | 0.00  | 1953.74                                     |  |  |
| Shahzan IOI 1 Estate  |   | 0.00  | 1609.22                                     |  |  |
| Shahzan IOI 2 Estate  |   | 0.00  | 1724.65                                     |  |  |
| Leepang A Estate  |   | 0.00  | 0.00  |  |  |
| Total   |   |   |   |  |  |

| 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) |   |   |                                |     |  |
|---|---|---|--------------------------------|-----|--|
| Out growers /   |   | Tonnage (   | (MT) / year                    |     |  |
| smallholders  | Estimated last year<br>(Aug 23 – July 24) | Act<br>(May 23  | Forecast<br>(Aug 24 – July 25) |     |  |
|   |   | Previous license period (May 23 – July 23) Current license period (Aug 23 – Apr 24) |                                |     |  |
| N/A   | N/A                                       | N/A   | N/A                            | N/A |  |



| Total | N/A | N/A | N/A |
|-------|-----|-----|-----|
| 100   | /   | ,   | ,   |

| 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<br>(mt) |  |  |  |  |
| 1     | May 2023   | 21,374.00                                     | -   | 21,374.00               |  |  |  |  |
| 2     | Jun 2023   | 22,112.47                                     | -   | 22,112.47               |  |  |  |  |
| 3     | July 2023  | 21,667.34                                     | -   | 21,667.34               |  |  |  |  |
| 4     | Aug 2023   | 30,481.14                                     | -   | 30,481.14               |  |  |  |  |
| 5     | Sept 2023  | 30,873.92                                     | -   | 30,873.92               |  |  |  |  |
| 6     | Oct 2023   | 28,053.42                                     | -   | 28,053.42               |  |  |  |  |
| 7     | Nov 2023   | 24,039.83                                     | -   | 24,039.83               |  |  |  |  |
| 8     | Dec 2023   | 22,799.60                                     | -   | 22,799.60               |  |  |  |  |
| 9     | Jan 2024   | 21,423.59                                     | -   | 21,423.59               |  |  |  |  |
| 10    | Feb 2024   | 19,167.62                                     | -   | 19,167.62               |  |  |  |  |
| 11    | Mar 2024   | 23,520.57                                     | -   | 23,520.57               |  |  |  |  |
| 12    | Apr 2024   | 22,496.32                                     | -   | 22,496.32               |  |  |  |  |
|       | TOTAL  | 288,009.82                                    | -   | 288,009.82              |  |  |  |  |

| 10. Summary of Certified Tonnage (MT) (not applicable for ISS) |  |                           |                                |  |  |  |
|--|--|---------------------------|--------------------------------|--|--|--|
| Estimated last year<br>(Aug 23 – July 24)                      | (M   | Actual<br>ay 23 - Apr 24) | Forecast<br>(Aug 24 – July 25) |  |  |  |
|  | Previous license perio<br>(May 23 – July 23) |                           |                                |  |  |  |
| FFB  |  | FFB                       | FFB                            |  |  |  |
| 289,164.00 mt  | 65,153.81 mt                                 | 222,856.01 mt             | 302,486.00 mt                  |  |  |  |
|  | TOTAL  | 288,009.82 mt             |                                |  |  |  |
| CPO (OER: 22.0 %)  | СРО  | (OER: 21.93 %)            | CPO (OER: 22.15 %)             |  |  |  |
| 63,616.08 mt   | 14,038.90 mt                                 | 49,186.62 mt              | 67,000.60 mt                   |  |  |  |
|  | TOTAL  | 63,225.52 mt              |                                |  |  |  |
| PK (KER: 4.50 %)   | PK   | (KER: 4.20 %)             | PK (KER: 4.61 %)               |  |  |  |
| 13,012.38 mt   | 2,516.56 mt                                  | 9,596.99 mt               | 13,940.70 mt                   |  |  |  |
|  | TOTAL  | 12,113.55 mt              |                                |  |  |  |



| 10A. | <b>Monthly Records of Certified</b> | CPO & PK since the last audit |                   |
|------|-------------------------------------|-------------------------------|-------------------|
| No.  | Month - Year                        | Certified CPO (MT)            | Certified PK (MT) |
| 1    | May 2023                            | 4,621.64                      | 896.68            |
| 2    | Jun 2023                            | 4,717.09                      | 837.82            |
| 3    | July 2023                           | 4,700.17                      | 782.06            |
| 4    | Aug 2023                            | 6,759.94                      | 1,221.33          |
| 5    | Sept 2023                           | 6,873.02                      | 1,335.67          |
| 6    | Oct 2023                            | 6,233.53                      | 1,281.76          |
| 7    | Nov 2023                            | 5,301.28                      | 1,051.08          |
| 8    | Dec 2023                            | 5,121.59                      | 968.68            |
| 9    | Jan 2024                            | 4,656.64                      | 906.36            |
| 10   | Feb 2024                            | 4,323.99                      | 882.92            |
| 11   | Mar 2024                            | 5,186.43                      | 1,042.94          |
| 12   | Apr 2024                            | 4,730.20                      | 906.25            |
|      | TOTAL                               | 63,225.52                     | 12,113.55         |

| 11. Summary of Actual Volume sold  Current License period (Aug 2023 – Apr 2024) |                                     |                         |        |              |           |  |  |  |
|---|-------------------------------------|-------------------------|--------|--------------|-----------|--|--|--|
|   | iise periou (Aug 2025               | Other Schemes Certified |        |              |           |  |  |  |
|   | RSPO Certified                      | ISCC                    | Others | Conventional | Total     |  |  |  |
| CPO (MT)  | 42,563.81                           | -                       | -      | -            | 42,563.81 |  |  |  |
| PK (MT)   | 8,662.83                            | -                       | -      | -            | 8,662.83  |  |  |  |
| Credits   | -                                   | -                       | -      | -            | -         |  |  |  |
| Previous Lice   | ense period (May 2023 -             | - July 2023)            |        |              |           |  |  |  |
| CPO (MT)  | 13,068.58                           | -                       | -      | -            | 13,068.58 |  |  |  |
| PK (MT)   | 2,333.35                            | -                       | -      | -            | 2,333.35  |  |  |  |
| Credits   | -                                   | -                       | -      | -            | -         |  |  |  |
| Note:   | -<br>RSPO certified material but so | old as non-RSPO.        | -      | -            | -         |  |  |  |

| 11A. | 11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)       |                   |           |           |  |  |  |
|------|---|-------------------|-----------|-----------|--|--|--|
| No.  | Buyers Name PalmTrace Trading Certified CPO Sold Certified PK Sold License Number (MT) (MT) |                   |           |           |  |  |  |
| 1    | IOI Commodity Trading Sdn<br>Bhd  | RSPO_PO1000003601 | 55,632.39 | 10,996.18 |  |  |  |



| TOTAL 55,632.39 10,996.18 |
|---------------------------|
|---------------------------|

| 11B. Re | 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<br>(MT) |  |  |  |
| 1       | N/A   | N/A         | N/A                     | N/A                       |  |  |  |
|         |   | TOTAL       | N/A                     | N/A                       |  |  |  |

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

| 11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) |             |                                     |                                    |  |  |  |
|---|-------------|-------------------------------------|------------------------------------|--|--|--|
| No.   | Buyers Name | PalmTrace Trading<br>License Number | RSPO Credits of Certified CPO Sold |  |  |  |
| 1   | N/A         | N/A                                 | N/A                                |  |  |  |
|   |             | N/A                                 |                                    |  |  |  |

| 12. Independent Smallholders Certified Tonnage (MT) / Volume |             |                         |      |                            |      |      |                              |      |      |
|--|-------------|-------------------------|------|----------------------------|------|------|------------------------------|------|------|
|  |             | mated las<br>ot Applica | -    | Actual<br>(Not Applicable) |      |      | Forecast<br>(Not Applicable) |      |      |
| Phase  | Eligibility | MS A                    | MS B | Eligibility                | MS A | MS B | Eligibility                  | MS A | MS B |
|  | 40%         | 70%                     | 100% | 40%                        | 70%  | 100% | 40%                          | 70%  | 100% |
| FFB  |             |                         | N/A  |                            |      | N/A  |                              |      | N/A  |
| IS-CSPO  | N/A         | N/A                     |      | N/A                        | N/A  |      | N/A                          | N/A  |      |
| IS-CSPKO   | N/A         | N/A                     |      | N/A                        | N/A  |      | N/A                          | N/A  |      |
| IS-CSPKE   | N/A         | N/A                     |      | N/A                        | N/A  |      | N/A                          | N/A  |      |
| СЅРК   | 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 |             |                       |                      |                    |                    |  |  |
|------|--|-------------|-----------------------|----------------------|--------------------|--------------------|--|--|
| No.  | Month - Year   | FFB<br>(MT) | Certified CPO<br>(MT) | Certified PK<br>(MT) | Certified PKO (MT) | Certified PKE (MT) |  |  |
| 1    | N/A  | N/A         | N/A                   | N/A                  | N/A                | N/A                |  |  |
|      | TOTAL  | N/A         | N/A                   | N/A                  | N/A                | N/A                |  |  |
| Note | Note: 1 mt = 1 credit  |             |                       |                      |                    |                    |  |  |

| 13. Independent Smallholders Actual Sold Tonnage / Volume |  |                     |                   |         |      |          |          |
|---|--|---------------------|-------------------|---------|------|----------|----------|
|   | FFB                                      | FFB<br>Conventional | FFB Other schemes | IS-CSPO | CSPK | IS-CSPKO | IS-CSPKE |
| <b>Current Li</b>   | Current License period (Not Applicable)  |                     |                   |         |      |          |          |
| Credits   |  |                     |                   | N/A     | N/A  | N/A      | N/A      |
| Physical  | N/A                                      | N/A                 | N/A               |         |      |          |          |
| Previous L  | Previous License period (Not Applicable) |                     |                   |         |      |          |          |
| Credits   |  |                     |                   | N/A     | N/A  | N/A      | N/A      |
| Physical  | N/A                                      | N/A                 | N/A               | N/A     |      |          |          |

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



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

#### **Certification Body:**

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067) Suite 29.01 Level 29, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.

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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

Website: <a href="https://www.bsigroup.com">www.bsigroup.com</a>

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

#### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 27/05/2024 - 31/05/2024. 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 on-site assessment was conducted on **24/07/2024**. 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<br>(Mill / Supply Base) | Year 1<br>(Re-<br>Certification) | Year 2<br>(ASA2-1) | Year 3<br>(ASA2-2) | Year 4<br>(ASA2-3) | <b>Year 5</b> (ASA2-4) |  |
| Gomali POM                   | ✓                                | ✓                  | <b>√</b>           | ✓                  | ✓                      |  |
| Gomali Estate                |                                  | ✓                  |                    | <b>√</b>           |                        |  |
| Paya Lang Estate             |                                  | ✓                  |                    | <b>√</b>           |                        |  |
| Tambang Estate               |                                  | ✓                  |                    | <b>√</b>           |                        |  |
| Sagil Estate                 |                                  | ✓                  |                    |                    | ✓                      |  |
| Regent Estate                |                                  |                    | <b>√</b>           |                    | ✓                      |  |
| Bahau Estate                 | <b>√</b>                         |                    | <b>√</b>           |                    | ✓                      |  |
| Kuala Jelei Estate           | <b>√</b>                         |                    | ✓                  |                    |                        |  |
| Bertam Estate                | ✓                                |                    |                    |                    |                        |  |
| Jasin Lalang Estate          | ✓                                |                    |                    | <b>√</b>           |                        |  |
| Bukit Dinding Estate         |                                  |                    | <b>√</b>           |                    | ✓                      |  |
| Bukit Serampang              |                                  |                    | <b>√</b>           |                    |                        |  |

Tentative Date of Next Visit: May 26, 2025 - May 30, 2025

**Total Number of Mandays: 15 Mandays** 

#### 2.2 BSI Assessment Team

| Name                               | Role        | Competency  |
|------------------------------------|-------------|---|
| Ahmad Rufi Abu<br>Talib Khan (ARK) | Team Leader | <b>Education:</b> Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015   |
|                                    |             | <b>Work Experience:</b> He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days |



|                               |             | throughout his current career as the auditor for multiple disciplines covering  |
|-------------------------------|-------------|---|
|                               |             | all over Malaysia <b>Training attended:</b> He has completed CQI – IRCA approved ISO 9001, ISO  |
|                               |             | 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.  |
|                               |             | <b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English   |
|                               |             | Aspect covered in this audit:   |
|                               |             | $\boxtimes$ Good Agriculture Practice $\square$ Health and Safety $\square$ Supply chain requirements   |
|                               |             | $\square$ Social $\ \boxtimes$ Environmental $\ \boxtimes$ Market Communication and claim requirements  |
|                               |             | $\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)  |
| Hafriazhar Mohd               | Team Member | Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM  |
| Mokhtar (HMM)                 |             | <b>Work Experience:</b> Environmental Officer (2002-2003), Mill Engineer (2003-2008), Project Control Engineer (2008-2011), Auditor/Client Manager (2011-present)   |
|                               |             | <b>Training attended:</b> Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)  |
|                               |             | <b>Language proficiency:</b> 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  |
|                               |             | $\ \square$ ISH context (ICS, internal audit, policy, business planning and trading system)   |
| Amirul Mohamad<br>Senan (MAS) | Team Member | <b>Education:</b> Holds a Bachelor of Agricultural Science from Universiti Putra Malaysia.  |
|                               |             | <b>Work Experience:</b> With over 6 years of experience in oil palm plantation operations, agriculture, safety, and health-related fields, he has been an integral part of a large publicly listed plantation organization since 2012. His job responsibilities include supervising and monitoring estate operations to ensure compliance with RSPO, ISCC, and MSPO requirements and regulations, Good Agricultural Practice, and other standard operating procedures. He has also actively participated in internal audits of plantation operations to ensure adherence to RSPO, ISCC, and MSPO requirements.  |
|                               |             | Subsequently, he spent 6 years working with an international Certification Body (CB), conducting certification audits of plantation operations for compliance with RSPO, MSPO, and ISCC requirements. He is a qualified Lead Auditor for RSPO P&C, RSPO Supply Chain, ISCC, MSPO OPMC, and MSPO Supply Chain certification audits, as well as a qualified Auditor for ISO 9001:2015 certification audits. Since January 2019. he has conducted audits in various countries, including Malaysia, Indonesia, Cambodia, Thailand, Singapore, Japan, India, Germany, and Spain. His expertise extends to the Palm Oil sector, encompassing industry fundamentals such as good |



| agricultural practices (GAP), best management practices (BMP), sustainability, social issues (e.g., worker welfare and employment terms, gender issues), occupational health and safety (OHS) matters, and environmental considerations (e.g., pollution control and resource conservation).  |
|---|
| <b>Training attended:</b> Attended, completed and passed ISO 9001:2015 Lead Auditor Course (CQI-IRCA certified), ISO 45001:2018 Lead Auditor Course (CQI-IRCA certified), RSPO P&C Lead Auditor Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Training Course (endorsed by RSPO Secretariat), RSPO P&C 2018 Version Introduction Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Update Course (endorsed by RSPO Secretariat), MSPO Lead Auditor Course (endorsed by MPOCC), MSPO Supply Chain Certification Training Course (endorsed by MPOCC), ISCC EU and PLUS Basic Training, ISCC Greenhouse Gas Training, ISCC Waste and Residues Training, SA8000 Introduction & Basic Auditor Course, and HCV-HCSA Assessor Training Course. |
| Language proficiency: Fluent in Bahasa Malaysia and English languages.  |
| Aspect covered in this audit:   |
| $\square$ Good Agriculture Practice $\boxtimes$ Health and Safety $\boxtimes$ Supply chain requirements   |
| ☐ Social ☐ Environmental ☐ Market Communication and claim requirements  |
| $\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)  |

#### **Accompanying Persons:**

| Name | Role |
|------|------|
| N/A  | N/A  |

#### 2.3 Assessment Plan

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

| Date   | Time                   | Subjects  | ARK | нмм | MAS |
|--|------------------------|---|-----|-----|-----|
| Sunday,<br>26/05/2024  | PM                     | Audit team travel to Karak  | √   | √   | √   |
| Monday,<br>27/05/2024<br>Day 1<br>Bukit<br>Dinding<br>Estate | 09:00 AM -<br>09:30 AM | Opening meeting @ <b>Bukit Dinding Estate</b> • Opening presentation by audit team leader  • Confirmation of assessment scope and finalize audit plan | √   | √   | √   |



| Date   | Time                   | Subjects   | ARK | нмм | MAS      |
|--|------------------------|--|-----|-----|----------|
|  | 09:30 AM -<br>12:30 PM | Bukit Dinding Estate  Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.     | √   | √   | √        |
|  | 10:30 AM -<br>12:30 PM | Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)   | 1   | √   | -        |
|  | 12:30 PM –<br>01:30 PM | Lunch break  | √   | √   | √        |
|  | 01:30 PM -<br>04:30 PM | Document Assessment P1 – P7:  General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | √   | √   | √        |
|  | 04:30 PM –<br>05:00 PM | <ul><li>Auditors discussion</li><li>Day 1 Interim Closing Briefing</li></ul>   | √   | √   | <b>√</b> |
| Tuesday,<br>28/05/2024<br>Day 2<br>Bahau<br>Estate | 09:00 AM -<br>12:30 PM | Bahau Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.              | √   | √   | √        |
|  | 10:30 AM -<br>12:30 PM | Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)   | -   | √   | -        |
|  | 12:30 PM -<br>01:30 PM | Lunch break  | √   | √   | √        |



| Date  | Time                   | Subjects  | ARK      | нмм | MAS |
|---|------------------------|---|----------|-----|-----|
|   | 01:30 PM -             | Document Assessment P1 – P7:  | √        | √   | √   |
|   | 04:30 PM               | SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation  |          |     |     |
|   | 04:30 PM -             | Auditors' discussion  | √        | √   | √   |
|   | 05:00 PM               | Day 2 Interim Closing Briefing  |          |     |     |
| Wednesday,  | 09:00 AM -             | Regent Estate   | <b>√</b> | √   | √   |
| 29/05/2024 Day 3 Regent Estate                    | 12:30 PM               | Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.  |          |     |     |
|   | 10:30 AM –<br>12:30 PM | Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)  | -        | √   | -   |
|   | 12:30 PM -<br>01:30 PM | Lunch break   | √        | √   | √   |
|   | 01:30 PM -<br>04:30 PM | Document Review P1 – P7:  SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation  | √        | V   | √   |
|   | 04:30 PM -<br>05:00 PM | Auditors' discussion     Day 3 Interim Closing Briefing   | √        | √   | √   |
| Thursday,<br>30/05/2024<br>Day 4<br>Gomali<br>POM | 09:00 AM –<br>12:30 PM | Gomali Palm Oil Mill  Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc. | √        | √   | √   |



| Date   | Time                   | Subjects   | ARK          | нмм | MAS |
|--|------------------------|--|--------------|-----|-----|
|  | 10:30 AM -<br>12:30 PM | Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)   | -            | √   | -   |
|  | 12:30 PM -<br>01:30 PM | Lunch break  | V            | √   | √   |
|  | 01:30 PM -<br>04:30 PM | Document Assessment P1 – P7: SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, supply chain requirement, market communication and claims, CIP & implementation     | √            | √   | √   |
|  | 04:30 PM -             | Auditors' discussion   | $\checkmark$ | √   | √   |
|  | 05:00 PM               | Day 4 Interim Closing Briefing   |              |     |     |
| Friday,<br>31/05/2024<br>Day 5<br>Sagil Estate | 9:00 AM –<br>12:30 PM  | Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. | ✓            | √   | √   |
|  | 10:30 AM –<br>12:30 PM | Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)   | -            | √   | -   |
|  | 12:30 PM -<br>01:30 PM | Lunch break  | √            | √   | √   |
|  | 1:30 PM -              | Document Assessment P1 – P7:   | <b>√</b>     | √   | √   |
|  | 3:30 PM                | SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation   |              |     |     |
|  | 3:30 PM -              | Auditors' discussion   | √            | √   | √   |
|  | 4:30 PM                | Preparation For Closing Meeting     Day 5 Interim  |              |     |     |
|  | 4:30 PM –<br>5:00 PM   | Closing Meeting  | √            | √   | √   |



#### **Major Non Conformance Close Out Assessment Plan.**

| Date                     | Time                  | Subjects  | ARK      |
|--------------------------|-----------------------|---|----------|
| Tuesday<br>23/07/2024    | PM                    | Audit team travel to Bahau  | ✓        |
| Wednesday,<br>24/07/2024 | 9:00 AM - 9:30<br>AM  | Opening meeting  Opening presentation by audit team leader  Confirmation of assessment scope and finalize audit plan  | <b>√</b> |
|                          | 9:30 AM –<br>12:30 PM | Verification on Major NC closure evidence. Document review, site observation, workers/stakeholder interview (individual and group session) for:  1. 2501725-202405-M1 | <b>√</b> |
|                          | 12:30 PM              | Closing Meeting   | -        |



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

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

| Requirement  | Assessment   | Compliance |
|--|--|------------|
| Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?   | Yes. Time bound plan included all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company. IOI Time Bound Plan has been approved by RSPO on 11/09/2023.   | Complied   |
| Have all the estates and mills certified within five (5) years after obtaining RSPO membership?  If no, has RSPO Secretariat approval obtained?  Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021   | No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 11/09/2023 was approved RSPO. The approved TBP states that IOI Corporation Berhad plans to achieve 100% RSPO Certification for all estates and mills by 2025.  | Complied   |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.  If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021. | No new acquisition. For PT Sawit Nabati Agro (SNA) all group except PT Kalimantan Prima Agro Mandiri (KPAM) has undergone certification audit. Meanwhile, for PT KPAM and IOI Pelita is planning to be certified in 2024 and 2025 respectively. Due to pandemic and in the process of obtaining the complete HGU and TBP has been approved by RSPO on 11/09/2023 for PT SNA and PT KPAM. Besides, the new proposed timebound for IOI Pelita approved by RSPO is justified as subject to the time requires for land survey endorsement and land excised activities. For PT Sawit Nabati Agro all group except PT Kalimantan Prima Agro Mandiri has been audited on 28/11/2022 to 03/12/2022. Final report has been completed at 16/07/2023 and certified. | Complied   |
| Any deviations from the maximum periods requires approval by the RSPO Secretariat.   | IOI RSPO Time Bound Plan is approved by RSPO with valid justification from IOI.  | Complied   |
| Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.  Is this consistent with the ACOP reporting?   | Yes. PT Sawit Nabati Agro is Estates under IOI Group which consist of 4 estates which is PT Berkat Nabati Sawit, PT Sukses Karya Sawit, PT Bumi Sawit Sejahtera and PT Kalimantan Prima Agro Mandiri. For PT Sawit Nabati Agro all group except PT Kalimantan Prima Agro Mandiri has undergone certification audit while PT KPAM plan to be certified in 2024. Due to Pandemic and in the process of obtaining the complete HGU and TBP has been approved by RSPO on 11/09/2023. For PT Sawit Nabati Agro all group except PT Kalimantan Prima Agro Mandiri has been audited on 28/11/2022 to 03/12/2022. Final report has been completed at 16/07/2023  | Complied   |



| Have there been any isolated lapse implementation of the plan? If yes a Minor compliance shall be raised  |  | and certified. IOI Pelita plan to be certified in 2025 and justified as subject to the time requires for land survey endorsement and land excised activities in reference to the approved TBP dated 11/09/2023  No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 11/09/2023 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There have not been any isolated lapses in implementation of the plan. Plan for Certification has been conducted as per approved plan which year of 2022. Sites had been audited on 28/11/2022- 03/12/2022 and Major NC closure had been conducted on 10th to 11th May 2023. Final report has been completed at 16/07/2023 and certified.   | Complied |  |  |  |  |
|---|--|---|----------|--|--|--|--|
| Have there been any fundamental failure unable to justify delay in planning assessments) to proceed with implementation the plan? If yes a Major non-compliance sharaised | the on of  | No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 11/09/2023 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There has not been any isolated lapses in implementation of the plan.   | 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.                                     | referr<br>units<br>incide<br>IOI's<br>PT Bi<br>resolv<br>proce<br>Agro<br>Public<br>HCSA<br>Currel<br>pendii<br>Repor<br>issues<br>latest<br>https:<br>028Er<br>As off<br>any re | tes on the RSPO CP Complaints case tracking were led to on issues related to this on IOI's uncertified prior to and during the audit. Verified that ences of HCV clearance that were reported at the uncertified unit at Kalimantan, Indonesia namely umi Sawit Sejahtera since year 2010 is being yed as per the RSPO NPP and RSPO CP Complaints sses. Another 1 unit, namely PT Kalimantan Prima Mandiri at Kalimantan, had undergone the NPP c Consultation and approved in April 2018 and Peer Review Assessment completed in May 2018. Intly, the plantation is under development and ing issuance by the Local Government HGU. Its on the NPP progress made to resolve the sat the said units were checked and monitored till update made available on:  1.1/askrspo.force.com/Complaint/s/case/50090000 rz8AAC/detail  2.23 this audit, there has been no other incidences of eplacement of primary forest at any other area | Complied |  |  |  |  |
|   |  | the IOI group   | Complied |  |  |  |  |
| Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.  | Mandi<br>new p   | The concession in Indonesia PT Kalimantan Prima Agro<br>Mandiri had undergone the NPP process prior to any<br>new planting. RSPO has approved PT Kalimantan Prima<br>Agro Mandiri NPP Summary Report and was published  |          |  |  |  |  |



| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1  | There was no legal non-compliance reported. IOI continued to comply with all applicable legal requirements. Compliance to each applicable law and regulation are monitored by the operating units. The certification units obtained and renewed licenses and permits as required by the law. Website checked   | Complied |
|--|--|----------|
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2   | There were no labour disputes reported. IOI continued to monitor the labour issue. The JCC Meeting that involved by top management was conducted to ensure there is no labour issue in IOI business. Website checked confirmed that there is no issue on Labour Disputes.  | Complied |
|  | Further information on the status of the case is available in RSPO Complaints Portal website <a href="Case: GR-000926">Case: GR-000926</a> (force.com)  Details of the process taken by IOI for the conclusion of the issue can be referred in the IOI website <a href="https://www.ioigroup.com/sustainability/ioi-pelita-current-progress">https://www.ioigroup.com/sustainability/ioi-pelita-current-progress</a> ; <a href="https://www.ioigroup.com/press-releases/ioi-announces-final-settlement-of-the-ioi-pelita-sarawak-land-dispute-case">https://www.ioigroup.com/press-releases/ioi-announces-final-settlement-of-the-ioi-pelita-sarawak-land-dispute-case</a> |          |
|  | (https://www.ioigroup.com/sustainability/ioi-pelita-<br>current-progress).  The land conflict in IOI Pelita had been resolved and<br>the complaint was formally closed.  |          |
| Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8. | http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PTKPAM.pdf  Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility as per the link below: https://askrspo.force.com/ Complaint/s/case/50090000028ErzqAAC/detail This is further check in the website: https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. Only 1 (one) management unit identified with potential liability and require concept note and remediation plan as reported in case tracker. Further information on the current progress is available in IOI Corporation Berhad's website:        | Complied |
|  | on the RSPO website for public notification on 13 April 2018.  The NPP public notification could be assessed through the link below: <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/page/2">https://rspo.org/certification/new-planting-procedure/public-consultations/page/2</a> ?  HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:   |          |



|   | confirmed that there is no issue on Legal non-compliance.   |          |
|---|---|----------|
| 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. Internal audit was carried out for IOI Pelita Plantation Sdn Bhd (Sejap Estate) on 16-18/07/2024 and PT Kalimantan Prima Agro Mandiri on 16-17/01/2024. A positive assurance statement was available and justified. Where related to land rights, IOI is actively resolving it. Frequency on internal audit was conducted on yearly basis. | 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 non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.   | Complied |
| Have there been any stakeholder (including NGO) consultation conducted?   | Stakeholders are being engaged during stakeholders' consultation which are being carried out during social impact assessment (SIA). Issues raised during the session are being recorded and actions/resolutions being handled by respective units.  | Complied |

#### 3.2 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards  |   |                   |  |  |  |  |  |  |  |  |  |
|---|---|-------------------|--|--|--|--|--|--|--|--|--|
| Requirement   | Remarks   | Compliance        |  |  |  |  |  |  |  |  |  |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?   | There are no Scheme Smallholders or Scheme Outgrowers within the Mill's Certification Unit. | Not<br>Applicable |  |  |  |  |  |  |  |  |  |
| OFI shall be raised if after one year where 100% of<br>the scheme smallholders and scheme outgrowers are<br>not in compliance, a minor NC after two years, and a<br>major NC if this requirement is not met after three<br>years. |   |                   |  |  |  |  |  |  |  |  |  |



#### **Approved Time Bound Plan**

| Name of                         |          | Name<br>of the                  | Location Address   |          | 1          |                          | ordinates<br>al degree)                       | Total                    | Certificatio                     | Plan Year                             |   | Date of<br>Last TBP                              | (Onl   | <b>REVISION</b> ly applicable wh    | OF THE TBP<br>nen revision is I | made) |
|---------------------------------|----------|---------------------------------|--|----------|------------|--------------------------|---|--------------------------|----------------------------------|---------------------------------------|---|--|--|-------------------------------------|---------------------------------|-------|
| the Unit of Certification (UoC) | Country  | Mills<br>and<br>Supply<br>Bases |  | Latitude | Longitude  | Manage<br>d Area<br>(Ha) | n Status<br>(Certified<br>/ Not<br>certified) | for<br>Certificatio<br>n | Actual<br>Certificatio<br>n Year | Verified<br>and<br>Approve<br>d by CB | Any<br>revision<br>from<br>the last<br>approve<br>d TBP?<br>(Yes /<br>No) | New<br>Proposed<br>Year for<br>Certificati<br>on | Justificati<br>on of<br>changes<br>for each<br>UoC | Date of<br>approval<br>from<br>RSPO |                                 |       |
| Pamol<br>Kluang                 | Malaysia | Pamol<br>Kluang<br>POM          | 81/2 Mile,<br>Mersing Road,<br>86007 Kluang,<br>Johor, Malaysia. | 2.110969 | 103.392292 | -                        | Certified                                     |                          | 2010                             | 24/4/2022                             | No  |  |  |                                     |                                 |       |
|                                 | Malaysia | Pamol<br>Timur<br>Estate        | Kluang, Johor  | 2.111947 | 103.385564 | 2,296.11                 | Certified                                     |                          | 2010                             | 24/4/2022                             | No  |  |  |                                     |                                 |       |
|                                 | Malaysia | Pamol<br>Barat<br>Estate        | Kluang, Johor  | 2.113033 | 103.343842 | 2,310.32                 | Certified                                     |                          | 2010                             | 24/4/2022                             | No  |  |  |                                     |                                 |       |
|                                 | Malaysia | Mamor<br>Estate                 | Kluang, Johor  | 2.147034 | 103.302668 | 2,230.00                 | Certified                                     |                          | 2010                             | 24/4/2022                             | No  |  |  |                                     |                                 |       |
|                                 | Malaysia | Unijaya<br>Estate               | Kluang, Johor  | 1.940558 | 103.278069 | 1,260.50                 | Certified                                     |                          | 2010                             | 24/4/2022                             | No  |  |  |                                     |                                 |       |
|                                 | Malaysia | Kahang<br>Estate                | Kluang, Johor  | 2.326773 | 103.494248 | 2,419.90                 | Certified                                     |                          | 2010                             | 24/4/2022                             | No  |  |  |                                     |                                 |       |
|                                 | Malaysia | Swee<br>Lam<br>Estate           | Kluang, Johor  | 1.674780 | 103.653778 | 1,160.96                 | Certified                                     |                          | 2010                             | 24/4/2022                             | No  |  |  |                                     |                                 |       |



| Bukit Leelau | Malaysia | Bukit                     | IOI Corporation   | 3.302979 | 103.137365 | -        | Certified | 20 | 10 29/12/20      | 2 No  |  |  |
|--------------|----------|---------------------------|---|----------|------------|----------|-----------|----|------------------|-------|--|--|
|              |          | Leelau<br>POM             | Berhad Bukit Leelau Certification Unit KM 75, Kuantan                       |          |            |          |           |    | 1                |       |  |  |
|              |          |                           | Segamat<br>Highway<br>26700<br>Muadzam Shah<br>Pahang Darul<br>Makmur       |          |            |          |           |    |                  |       |  |  |
|              | Malaysia | Bukit<br>Leelau<br>Estate | Muadzam Shah,<br>Pahang   | 3.298692 | 103.132555 | 2,096.00 | Certified | 20 | 10 29/12/20<br>1 | )2 No |  |  |
|              | Malaysia | Detas<br>Estate           | Muadzam Shah,<br>Pahang   | 3.547505 | 103.050146 | 2,225.78 | Certified | 20 | 10 29/12/20<br>1 | )2 No |  |  |
|              | Malaysia | Merchon<br>g Estate       | Muadzam Shah,<br>Pahang   | 3.024548 | 103.201716 | 1,952.50 | Certified | 20 | 1                |       |  |  |
|              | Malaysia | Mekassa<br>r Estate       | Muadzam Shah,<br>Pahang   | 2.986702 | 103.167433 | 1,209.39 | Certified | 20 | 1                |       |  |  |
|              | Malaysia | Leepang<br>A Estate       | Muadzam Shah,<br>Pahang   | 3.003644 | 103.027223 | 2,403.70 | Certified | 20 | 10 29/12/20<br>1 | )2 No |  |  |
|              | Malaysia | Laukin A<br>Estate        | Muadzam Shah,<br>Pahang   | 3.020739 | 103.045601 | 1,619.90 | Certified | 20 | 1                |       |  |  |
| Gomali       | Malaysia | Gomali<br>POM             | 5th Mile, Jalan<br>Gemas-Batu<br>Anam 85100<br>Segamat, Johor,<br>Malaysia. | 2.610811 | 102.679447 | -        | Certified | 20 |                  |       |  |  |
|              | Malaysia | Gomali<br>Estate          | Segamat, Johor  | 2.611543 | 102.673415 | 2,555.75 | Certified | 20 | , , ,            |       |  |  |
|              | Malaysia | Paya<br>Lang<br>Estate    | Segamat, Johor  | 2.582588 | 102.707515 | 2,467.25 | Certified | 20 | , ,              |       |  |  |
|              | Malaysia | Tamban<br>g Estate        | Segamat, Johor  | 2.631926 | 102.716559 | 2,010.70 | Certified | 20 | , ,              |       |  |  |
|              | Malaysia | Sagil<br>Estate           | Tangkak, Johor  | 2.315033 | 102.634689 | 2,504.99 | Certified | 20 | 10 24/8/202      | !1 No |  |  |
|              | Malaysia | Regent<br>Estate          | Gemencheh,<br>Negeri Sembilan   | 2.513968 | 102.404654 | 2,300.27 | Certified | 20 | 10 24/8/202      | No No |  |  |



|       | Malaysia | Bahau<br>Estate            | Bahau, Negeri<br>Sembilan  | 2.809171 | 102.448731 | 2,841.41 | Certified | 2010 | 24/8/2021 | No |  |  |
|-------|----------|----------------------------|--|----------|------------|----------|-----------|------|-----------|----|--|--|
|       | Malaysia | Kuala<br>Jelai<br>Estate   | Durian Tunggal,<br>Melaka  | 2.774558 | 102.389750 | 679.2600 | Certified | 2010 | 24/8/2021 | No |  |  |
|       | Malaysia | Bertam<br>Estate           | Jasin, Melaka  | 2.304039 | 102.284858 | 448.8000 | Certified | 2010 | 24/8/2021 | No |  |  |
|       | Malaysia | Jasin<br>Lalang<br>Estate  | Karak, Pahang  | 2.254799 | 102.421417 | 750.75   | Certified | 2010 | 24/8/2021 | No |  |  |
| Pukin | Malaysia | Pukin<br>POM               | KM 30,<br>Lebuhraya Tun<br>Abdul Razak,<br>Keratong,<br>85007 Rompin,<br>Pahang,<br>Malaysia | 2.721691 | 102.909500 | -        | Certified | 2012 | 13/6/2022 | No |  |  |
|       | Malaysia | Pukin<br>Estate            | KM 30,<br>Lebuhraya Tun<br>Abdul Razak,<br>Keratong,<br>85007 Rompin,<br>Pahang,<br>Malaysia | 2.718814 | 102.907972 | 2,428.12 | Certified | 2012 | 13/6/2022 | No |  |  |
|       | Malaysia | Shahzan<br>IOI 1<br>Estate | KM 30,<br>Lebuhraya Tun<br>Abdul Razak,<br>Keratong,<br>85007 Rompin,<br>Pahang,<br>Malaysia | 2.799583 | 102.848972 | 1,562.98 | Certified | 2012 | 13/6/2022 | No |  |  |
|       | Malaysia | Shahzan<br>IOI 2<br>Estate | KM 30,<br>Lebuhraya Tun<br>Abdul Razak,<br>Keratong,<br>85007 Rompin,<br>Pahang,<br>Malaysia | 2.816556 | 102.874028 | 1,640.74 | Certified | 2012 | 13/6/2022 | No |  |  |
|       | Malaysia | Segamat<br>Estate          | KM 5, Jalan<br>Segamat Muar,<br>85009  | 2.489590 | 102.882880 | 1,896.40 | Certified | 2012 | 13/6/2022 | No |  |  |



|             |          |                                  | Segamat, Johor,<br>Malaysia   |          |            |          |           |      |           |    |  |  |
|-------------|----------|----------------------------------|---|----------|------------|----------|-----------|------|-----------|----|--|--|
|             | Malaysia | Leepang<br>A Estate              | KM 68,<br>Lebuhraya<br>Segamat–<br>Kuantan,<br>26700<br>Muadzam Shah,<br>Pahang,<br>Malaysia  | 3.010250 | 103.053417 | 2,725.12 | Certified | 2012 | 13/6/2022 | No |  |  |
|             | Malaysia | Bukit<br>Serampa<br>ng<br>Estate | KM 12, Jalan<br>Sagil–Tangkak,<br>84900<br>Tangkak, Johor,<br>Malaysia  | 2.323795 | 102.688279 | 2,403.70 | Certified | 2012 | 13/6/2022 | No |  |  |
| Unico Group | Malaysia | Unico<br>POM                     | 1.8 km Jalan<br>Jeroco Off Mile<br>13, Lahad Datu<br>Sandakan,<br>Sandakan<br>Highway, P.O<br>Box 61532,<br>91123 Lahad<br>Datu, Sabah,<br>Malaysia | 5.150044 | 118.222064 | -        | Certified | 2018 | 5/7/2021  | No |  |  |
|             | Malaysia | Unico 6<br>Estates               | Unico Plantation<br>Sdn. Bhd –<br>Unico 6<br>MDLD 5123,<br>KM3, Jalan<br>Segama, 91100<br>Lahad Datu,<br>Sabah, Malaysia                            |          | 118.302033 | 2,060.00 | Certified | 2018 | 5/7/2021  | No |  |  |
|             | Malaysia | Ladang<br>Asas<br>Estates        | M D L D 5123,<br>KM3, Jalan<br>Segama, 91100<br>Lahad Datu,<br>Sabah, Malaysia  | 5.240000 | 118.270000 | 1,909.00 | Certified | 2018 | 5/7/2021  | No |  |  |
| Unico Desa  | Malaysia | Unico<br>Desa<br>POM             | Unico Desa<br>POM, KM3,<br>Jalan Segama,  | 5.413089 | 118.529331 | -        | Certified | 2018 | 16/5/2022 | No |  |  |





|          |                   | 91100, Lahad<br>Datu, Sabah  |          |            |          |           |      |           |    |  |  |
|----------|-------------------|--|----------|------------|----------|-----------|------|-----------|----|--|--|
| Malaysia | Unico 1<br>Estate | Unico-Desa<br>Plantations<br>Berhad -<br>Unico 1 MDLD<br>5123,KM3,<br>Jalan<br>Segama, 91100<br>Lahad Datu,<br>Sabah | 5.411369 | 118.523278 | 2,317.50 | Certified | 2018 | 16/5/2022 | No |  |  |
| Malaysia | Unico 2<br>Estate | Unico-Desa<br>Plantations<br>Berhad -<br>Unico 2 MDLD<br>5123,KM3,<br>Jalan<br>Segama, 91100<br>Lahad Datu,<br>Sabah | 5.419511 | 118.524750 | 2,352.02 | Certified | 2018 | 16/5/2022 | No |  |  |
| Malaysia | Unico 3<br>Estate | Unico-Desa<br>Plantations<br>Berhad -<br>Unico 3 MDLD<br>5123,KM3,<br>Jalan<br>Segama, 91100<br>Lahad Datu,<br>Sabah | 5.465122 | 118.551314 |          | Certified | 2018 | 16/5/2022 | No |  |  |
| Malaysia | Unico 4<br>Estate | Unico-Desa<br>Plantations<br>Berhad -<br>Unico 4 MDLD<br>5123,KM3,<br>Jalan<br>Segama, 91100<br>Lahad Datu,<br>Sabah | 5.397883 | 118.559472 | 2,235.69 | Certified | 2018 | 16/5/2022 | No |  |  |





|         | Malaysia | Unico 5<br>Estate   | Unico-Desa<br>Plantations<br>Berhad -<br>Unico 5 MDLD<br>5123,KM3,<br>Jalan<br>Segama, 91100<br>Lahad Datu,<br>Sabah | 5.373783 | 118.536417 | 2,287.47 | Certified | 2018 | 16/5/2022      | No |  |  |
|---------|----------|---------------------|--|----------|------------|----------|-----------|------|----------------|----|--|--|
| Morisem | Malaysia | Morisem<br>POM      | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia             |          | 118.369039 | -        | Certified | 2013 | 18/12/202      | No |  |  |
|         | Malaysia | Morisem<br>1 Estate | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia             | 5.490000 | 118.320000 | 2,032.00 | Certified | 2013 | 18/12/202      | No |  |  |
|         | Malaysia | Morisem<br>2 Estate | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>LahadDatu,<br>Sabah, Malaysia                 |          | 118.320000 | 2,042.14 | Certified | 2013 | 18/12/202<br>1 | No |  |  |
|         | Malaysia | Morisem<br>3 Estate | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia             | 5.500000 | 118.330000 | 2,013.70 | Certified | 2013 | 18/12/202      | No |  |  |



|         | Malaysia | Morisem<br>4 Estate | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia  | 5.340000 |            |          | Certified | 2013 | 18/12/202<br>1 | No |  |
|---------|----------|---------------------|---|----------|------------|----------|-----------|------|----------------|----|--|
|         | Malaysia | Leepang<br>2 Estate | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia  | 5.510000 | 118.380000 | 2,159.19 | Certified | 2013 | 18/12/202      | No |  |
| Syarimo | Malaysia | Syarimo<br>POM      | KM23, Jalan<br>Kinabatangan,<br>Sg. Pin,<br>Kinabatangan,<br>Sabah<br>Postal Address:<br>MDLD 5123, KM<br>3 Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia. | 5.333611 | 117.781250 | -        | Certified | 2013 | 20/3/2022      | No |  |
|         | Malaysia | Syarimo<br>1 Estate | Sg. Pin, Kinabatangan, Sabah Postal Address: MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia.  | 5.329078 | 117.825278 | 1,914.00 | Certified | 2013 | 20/3/2022      | No |  |

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| Malaysia | Syarimo<br>2 Estate | Sg. Pin, Kinabatangan, Sabah Postal Address: MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | 5.327342 |            |          |           | 2013 | 20/3/2022 |    |  |  |
|----------|---------------------|--|----------|------------|----------|-----------|------|-----------|----|--|--|
| Malaysia | Syarimo<br>3 Estate | Sg. Pin, Kinabatangan, Sabah Postal Address: MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | 5.329461 | 117.776236 | 2,442.02 | Certified | 2013 | 20/3/2022 | No |  |  |
| Malaysia | Syarimo<br>4 Estate | Sg. Pin, Kinabatangan, Sabah Postal Address: MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | 5.384028 | 117.764725 | 2,376.95 | Certified | 2013 | 20/3/2022 | No |  |  |



|          | Malaysia | Syarimo<br>5 Estate  | Sg. Pin, Kinabatangan, Sabah Postal Address: MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia.  | 5.351153 |            | 2,267.55 |           | 2013 | 20/3/2022 | No |  |  |
|----------|----------|----------------------|---|----------|------------|----------|-----------|------|-----------|----|--|--|
| Baturong | Malaysia | Baturong<br>POM      | Postal Address: MDLD 5123, KM3 Jalan Segama, Lock Bag No 15, 91109, Lahad Datu, Sabah Location Address: KM 52, Jalan Kunak-Tawau, Off Road KM3, 91109 Lahad Datu, Sabah | 4.755261 | 118.088681 | -        | Certified | 2010 | 8/10/2021 | No |  |  |
|          | Malaysia | Baturong<br>1 Estate | Location Address: KM 52, Jalan Kunak-Tawau, Off Road KM6, 91109 Lahad Datu, Sabah.  | 4.736017 | 118.070986 | 2,698.00 | Certified | 2010 | 8/10/2021 | No |  |  |
|          | Malaysia | Baturong<br>2 Estate | Location<br>Address:<br>KM 52, Jalan<br>Kunak-Tawau,<br>Off Road KM25,<br>91109   | 4.765442 | 118.028244 | 2,315.00 | Certified | 2010 | 8/10/2021 | No |  |  |



|         |          |                      | Lahad Datu,<br>Sabah.   |          |            |          |           |      |                |    |  |  |
|---------|----------|----------------------|---|----------|------------|----------|-----------|------|----------------|----|--|--|
|         | Malaysia | Baturong<br>3 Estate | Location Address: KM 52, Jalan Kunak-Tawau, Off Road KM14, 91109 Lahad Datu, Sabah.                           | 4.757722 | 118.002142 | 1,807.00 | Certified | 2010 | 8/10/2021      | No |  |  |
|         | Malaysia | Cantawa<br>n Estate  | Location<br>Address:<br>KM 20, Jalan<br>Tungku-Lahad<br>Datu, Off Road<br>KM6, 91109<br>Lahad Datu,<br>Sabah. | 5.065683 | 118.447639 | 1,163.00 | Certified | 2010 | 8/10/2021      | No |  |  |
| Leepang | Malaysia | Leepang<br>POM       | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia.     | 5.549000 | 118.437667 | -        | Certified | 2013 | 16/12/202<br>1 | No |  |  |
|         | Malaysia | Morisem<br>5 Estate  | MDLD 5123, KM<br>2, Jalan<br>Segama,Locked<br>Bag No. 15,<br>91109<br>LahadDatu,<br>Sabah,<br>Malaysia.       | 5.500658 | 118.420417 | 1,889.00 | Certified | 2013 | 16/12/202      | No |  |  |



|        | Malaysia | Leepang<br>1 Estate        | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia.  | 5.549358 |            |          | Certified | 2013 | 16/12/202 | No |  |
|--------|----------|----------------------------|--|----------|------------|----------|-----------|------|-----------|----|--|
|        | Malaysia | Leepang<br>5 Estate        | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia.  | 5.546683 | 118.434836 |          | Certified | 2013 | 16/12/202 | No |  |
|        | Malaysia | Permoda<br>lan 1<br>Estate | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia.  | 5.498853 | 118.456917 | 2,253.82 | Certified | 2013 | 16/12/202 | No |  |
|        | Malaysia | Permoda<br>lan 2<br>Estate | MDLD 5123, KM<br>2, Jalan<br>Segama,<br>Locked Bag No.<br>15, 91109<br>Lahad<br>Datu, Sabah,<br>Malaysia.  | 5.507639 | 118.478289 | 2,141.52 | Certified | 2013 | 16/12/202 | No |  |
| Mayvin | Malaysia | Mayvin<br>POM              | Mayvin Incorporated Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | 5.555300 | 117.226440 | -        | Certified | 2010 | 22/12/202 | No |  |

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| Malaysia | Mayvin 1<br>Estate   | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | 5.581886 |            |          | Certified | 2010 | 22/12/202<br>1 | No |  |  |
|----------|----------------------|--|----------|------------|----------|-----------|------|----------------|----|--|--|
| Malaysia | Mayvin 2<br>Estate   | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | 5.558614 | 117.222721 | 1,812.81 | Certified | 2010 | 22/12/202      | No |  |  |
| Malaysia | Tangkula<br>p Estate | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | 5.492423 | 117.247353 | 2,277.45 | Certified | 2010 | 22/12/202      | No |  |  |
| Malaysia | Mayvin 5<br>Estate   | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | 5.479906 | 117.334011 | 1,765.18 | Certified | 2010 | 22/12/202      | No |  |  |



|                | Malaysia | Mayvin 6<br>Estate    | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia                                  | 5.478833 |            | 1,836.82 | Certified | 2010 | 22/12/202 | No |  |
|----------------|----------|-----------------------|---|----------|------------|----------|-----------|------|-----------|----|--|
| Sakilan        | Malaysia | Sakilan<br>POM        | Mile 22,<br>Sandakan/Telup<br>id Road, WDT<br>164, 90009,<br>Sandakan,<br>Sabah,<br>Malaysia.   | 5.839372 |            | -        | Certified | 2010 | 16/4/2022 | No |  |
|                | Malaysia | Sakilan<br>Estate     | Sandakan,<br>Sabah  | 5.846975 |            | 2,296.37 | Certified | 2010 | 16/4/2022 | No |  |
|                | Malaysia | Linbar 1<br>Estate    | Sandakan,<br>Sabah  | 5.549619 | 117.681506 | 2,628.17 | Certified | 2010 | 16/4/2022 | No |  |
|                | Malaysia | Linbar 2<br>Estate    | Sandakan,<br>Sabah  | 5.502308 | 117.645242 | 2,211.83 | Certified | 2010 | 16/4/2022 | No |  |
| Pamol<br>Sabah | Malaysia | Pamol<br>Sabah<br>POM | Pamol Estates<br>(Sabah) Sdn<br>Bhd,<br>Mile 122,<br>Sandakan/Telup<br>id Road,<br>P.O Box 203,<br>90702,<br>Sandakan,<br>Sabah,<br>Malaysia. | 6.002417 | 117.398389 | -        | Certified | 2016 | 30/11/202 | No |  |
|                | Malaysia | Ulu<br>Estate         | Mile 122,<br>Sandakan/Telup<br>id Road,<br>P.O Box 203,<br>90702,<br>Sandakan,<br>Sabah,<br>Malaysia.   | 6.005139 | 117.392361 | 1,834.72 | Certified | 2016 | 30/11/202 | No |  |

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| 1        | 1                  | 1   |          | l          | 1        | 1         | <br> | I         | l  |  | i 1 |
|----------|--------------------|---|----------|------------|----------|-----------|------|-----------|----|--|-----|
| Malaysia | Estate             | Mile 122,<br>Sandakan/Telup<br>id Road,<br>P.O Box 203,<br>90702,<br>Sandakan,<br>Sabah,<br>Malaysia. | 6.005139 |            |          |           | 2016 | 30/11/202 | No |  |     |
| Malaysia | Estate             | Mile 122,<br>Sandakan/Telup<br>id Road,<br>P.O Box 203,<br>90702,<br>Sandakan,<br>Sabah,<br>Malaysia. | 6.015639 | 117.367694 | 2,126.55 | Certified | 2016 | 30/11/202 | No |  |     |
| Malaysia | Tindakon<br>Estate | Mile 122,<br>Sandakan/Telup<br>id Road,<br>P.O Box 203,<br>90702,<br>Sandakan,<br>Sabah,<br>Malaysia. | 5.980028 | 117.356472 | 2,051.02 | Certified | 2016 | 30/11/202 | No |  |     |
| Malaysia | Nangoh<br>Estate   | Mile 122,<br>Sandakan/Telup<br>id Road,<br>P.O Box 203,<br>90702,<br>Sandakan,<br>Sabah,<br>Malaysia. | 5.952417 | 117.253111 | 2,279.35 | Certified | 2016 | 30/11/202 | No |  |     |
| Malaysia | Meliau<br>Estate   | Mile 122,<br>Sandakan/Telup<br>id Road,P.O Box<br>203, 90702,<br>Sandakan,Saba<br>h, Malaysia.        | 5.952417 | 117.253111 | 2,998.65 | Certified | 2016 | 30/11/202 | No |  |     |



|                 | Malaysia | Sugut<br>Estate           | Mile 200,<br>Nangoh Paitan<br>Road,<br>P.O Box 203,<br>90702,<br>Sandakan,<br>Sabah,<br>Malaysia. | 6.232972 |            | 1,792.34 | Certified | 2016 | 30/11/202 | No |  |  |
|-----------------|----------|---------------------------|---|----------|------------|----------|-----------|------|-----------|----|--|--|
| Ladang<br>Sabah | Malaysia | Ladang<br>Sabah<br>POM    | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,<br>Sandakan,<br>Sabah,<br>Malaysia.  | 5.729989 | 117.577750 | -        | Certified | 2013 | 10/4/2022 | No |  |  |
|                 | Malaysia | Bimbing<br>an 1<br>Estate | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,<br>Sandakan,<br>Sabah.               | 5.621264 | 117.445917 | 1,937.39 | Certified | 2013 | 10/4/2022 | No |  |  |
|                 | Malaysia | Bimbing<br>an 2<br>Estate | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,<br>Sandakan,<br>Sabah.               | 5.619619 | 117.422942 | 1,955.61 | Certified | 2013 | 10/4/2022 | No |  |  |
|                 | Malaysia | Labuk<br>Estate           | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,<br>Sandakan,<br>Sabah.               | 5.670375 | 117.498867 | 2,668.50 | Certified | 2013 | 10/4/2022 | No |  |  |
|                 | Malaysia | Moynod<br>Estate          | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,                                      | 5.740817 | 117.610380 | 3,043.71 | Certified | 2013 | 10/4/2022 | No |  |  |

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|           |           |                           |   |                      |                 | -        |           |      |      |           | _   |      |   |  |
|-----------|-----------|---------------------------|---|----------------------|-----------------|----------|-----------|------|------|-----------|-----|------|---|--|
|           |           |                           | Sandakan,<br>Sabah.   |                      |                 |          |           |      |      |           |     |      |   |  |
|           | Malaysia  | Luangma<br>nis<br>Estate  | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,<br>Sandakan,<br>Sabah. | 5.763328             | 117.606369      | 2,713.29 | Certified |      | 2013 | 10/4/2022 | No  |      |   |  |
|           | Malaysia  | Laukin<br>Estate          | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,<br>Sandakan,<br>Sabah. | 5.778469             | 117.532433      | 2,503.53 | Certified |      | 2013 | 10/4/2022 | No  |      |   |  |
|           | Malaysia  | Terusan<br>Baru<br>Estate | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,<br>Sandakan,<br>Sabah. | 5.764825             | 117.610317      | 2,128.00 | Certified |      | 2013 | 10/4/2022 | No  |      |   |  |
|           | Malaysia  | Sungai<br>Sapi<br>Estate  | Mile 45,<br>Sandakan-<br>Telupid Road,<br>WDT 164,<br>90009,<br>Sandakan,<br>Sabah. | 5.807536             |                 | 1,299.30 | Certified |      | 2013 | 10/4/2022 | No  |      |   |  |
| SNA Group | Indonesia | PT. SKS<br>POM            | West<br>Kalimantan  | -<br>2.80039931<br>2 | 110.593248<br>4 |          | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |  |
|           | Indonesia | SKS 1<br>Estate           | West<br>Kalimantan  | -<br>2.79656663<br>1 | 110.583043<br>2 | 1,396.81 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |  |



| Inc | donesia | SKS 2<br>Estate | West<br>Kalimantan | -<br>2.79271117<br>9 | 110.585289<br>1 | 3,156.39 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |
|-----|---------|-----------------|--------------------|----------------------|-----------------|----------|-----------|------|------|-----------|-----|------|---|
| Inc | donesia | SKS 3<br>Estate | West<br>Kalimantan | -<br>2.79271117<br>9 | 110.538992<br>5 | 3,126.80 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |
| Inc | donesia | BNS 1<br>Estate | West<br>Kalimantan | -<br>2.79482253<br>2 | 110.645468<br>9 | 2,867.42 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |
| Inc | donesia | BNS 2<br>Estate | West<br>Kalimantan | -<br>2.79482253<br>2 | 110.645468<br>9 | 1,513.94 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |
| Inc | donesia | BNS 3<br>Estate | West<br>Kalimantan | -<br>2.85455836<br>4 | 110.660853<br>4 | 2,128.60 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |
| Inc | donesia | BNS 4<br>Estate | West<br>Kalimantan | -<br>2.85455836<br>4 | 110.660853<br>4 | 2,320.04 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |
| Inc | donesia | BSS 1<br>Estate | West<br>Kalimantan | -<br>2.81120090<br>8 | 110.913004<br>5 | 3,563.85 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |
| Inc | donesia | BSS 2<br>Estate | West<br>Kalimantan | -<br>2.87707612<br>2 | 110.826775<br>8 | 2,041.15 | Certified | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |





|                                     | Indonesia | BSS 3<br>Estate  | West<br>Kalimantan | -<br>2.89510402<br>6 | 110.760974<br>8 | 2,509.10 | Certified     | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |            |
|-------------------------------------|-----------|------------------|--------------------|----------------------|-----------------|----------|---------------|------|------|-----------|-----|------|---|------------|
|                                     | Indonesia | BSS 4<br>Estate  | West<br>Kalimantan | -<br>2.89510402<br>6 | 110.760974<br>8 | 1,689.90 | Certified     | 2021 | 2023 | 3/12/2022 | Yes | 2023 | Received<br>RSPO<br>certificate<br>from CB on<br>16/07/2023 |            |
|                                     | Indonesia | KPAM 1<br>Estate | West<br>Kalimantan | -<br>2.75873263<br>4 | 110.961786<br>2 | 2,408.00 | Not Certified | 2023 |      | 3/12/2022 | No  | 2024 |   | 11/09/2023 |
|                                     | Indonesia | KPAM 2<br>Estate | West<br>Kalimantan | -<br>2.72309407<br>2 | 111.043692<br>4 | 2,499.83 | Not Certified | 2023 |      | 3/12/2022 | No  | 2024 |   | 11/09/2023 |
|                                     | Indonesia | KPAM 3<br>Estate | West<br>Kalimantan | -<br>2.76162872<br>8 | 111.017108<br>9 | 2,307.02 | Not Certified | 2023 |      | 3/12/2022 | No  | 2024 |   | 11/09/2023 |
|                                     | Indonesia | KPAM 4<br>Estate | West<br>Kalimantan | -<br>2.72309407<br>2 | 111.043692<br>4 | 1,252.15 | Not Certified | 2023 |      | 3/12/2022 | No  | 2024 |   | 11/09/2023 |
| IOI Pelita<br>Plantation<br>Sdn Bhd | Malaysia  | Sejap<br>Estate  | Miri, Sarawak      | 3.6886940            | 114.170944<br>0 | 4,959.80 | Not Certified | 2025 |      | Nov-21    | No  | 2025 |   | 11/09/2023 |



#### 3.3 Details of Nonconformities

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

During this Assessment there were one (1) Critical; two (2) Minor nonconformities and four (4) Opportunity For Improvement raised. The Dynamic Plantations Bhd - Gomali Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Non-conformity                             |  |  |  |
|--|--|--|--|
| NCR Ref #                                  | 2501725-202405-M1  | Issued Date  | 31/05/2024   |
| Due Date                                   | 29/08/2024   | Closure Date   | 24/07/2024   |
| Indicator & Category<br>(Critical / Minor) | 6.7.3 – Critical   |  |  |
| Statement of Nonconformity:                | The process of workers us charge is not effectively imp  | se appropriate PPE which was plemented.  | as provided with free of   |
| Requirement Reference:                     | provided free of charge to a<br>hazardous operations, such<br>preparation, and harvesting  | iate personal protective equall workers at the place of workers at the place of workers at the place of workers and change out of PPE, wash as an change out of PPE, wash as an example out of PPE, wash as an example out of PPE, wash as a change of PPE, wash as a change out of PPE, wash as a change of PPE, wash as a change out of PPE, wash as a change out of PPE, was a change of PPE, was a change of PPE, was a change out of PPE, was a change out of PPE, was a change of PPE, was a change of PPE, was a chang | ork to cover all potentially<br>nachine operations, land<br>se applying pesticides are   |
| Objective Evidence:                        | Worker No. 1PIP/IOI/1115, the role of Ramp Attendan Safety Vest, Cotton Glove 10/05/2024. This provision Assessment and Risk Contr dated 15/04/2024), demoi Additionally, the worker att dan Pengedaran Buah Kelap of FFB (IOI/OHSMS/SaOP/same day the PPE was provensuring worker safety. However, during the site vwas engaged in arranging wearing the Safety Harness | eview, it was noted that the m/19775 with Personal Protect of the PPE, which included as an accordance with the Frol (HIRARC) titled Loading Frontrating the management's rended a training session title of Sawit – SaOP for Working of EST/018/00, Rev. No. 00, do rided, further emphasizing the the Fresh Fruit Bunches (FF s. This deviation from the satthe training provided is the information.  | tive Equipment (PPE) for a Hard Hat, Safety Boot, arness, was supplied on lazard Identification, Risk FB at Ramp (Rev.No. 01, commitment to safety. Identification of the Ramp and Grading ated 01/09/2022) on the emanagement's efforts in the aforementioned worker B) on the trailer without fety protocols outlined in |
| Corrections:                               | reminded of the safety 2. A quick refresher brie   | to use the safety harness<br>y procedures especially on the<br>fing on the proper use of the<br>was provided to the worker   | e risks involved.  |



| Root Cause Analysis:   | Though the estate management already issued, recorded and conducted the SaOP Bekerja di Ramp dan Penggredan Buah Kelapa Sawit – SaOP for Working on the Ramp and Grading of FFB (IOI/OHSMS/SaOP/EST/018/00, Rev. No. 00, dated 01/09/2022), the ramp operator was found not wearing the safety harness.   |
|------------------------|---|
|                        | 1. The worker did not fully understand the risks involved. As he perceived that the risks were low, he became complacent and neglected to wear the safety harness.  |
|                        | There was insufficient supervision by management to enforce the use of safety harnesses and ensure compliance with safety protocols.  |
|                        | The worker felt that the safety harness was uncomfortable or cumbersome, leading to him to avoid wearing it.  |
| Corrective Actions:    | 1. Implement more frequent and random checks by supervisors to ensure compliance with safety protocols. Continuous monitoring on ramp operation by the estate management using the inspection checklist. (Senarai Semak Alat Pelindung Diri dan Kelengkapan Kerja di Ramp has been established (IOI/OHSMS/EST/FM/012) and used as the supervision mechanism to ensure the safety requirement complied.)   |
|                        | 2. Arrange for all ramp workers to undergo refresher training on the importance of personal protective equipment (PPE) and the specific use of safety harnesses, emphasizing real-life consequences of non-compliance.  |
|                        | 3. Inform workers to report issues with PPE, such as discomfort or difficulties in using the safety harness, so these can be addressed promptly.  |
|                        | 4. Assess the safety harnesses provided to ensure they are comfortable and user-friendly. Based on feedback by users, upgrade to better designs that encourage use.   |
|                        | <ol> <li>Encourage workers to discuss safety issues, share incidents of non-<br/>compliance to reinforce the importance of adhering to safety protocols during<br/>safety toolbox meetings.</li> </ol>  |
|                        | 6. Disciplinary action for repeated non-compliance to underscore the importance of following safety protocols.  |
| Assessment Conclusion: | The management successfully conducted training sessions on the Safe Operating Procedure (SOP) for internal workers on 29/05/2024 and for external contractors on 04/06/2024. The focus of this training was the Safe Operating Procedure – Work at Height (Revision Date: 01/09/2022, Document No: IOI/OHSMS/SaOP/EST/057/00). This training aimed to ensure that all workers, both internal and external, are well-versed in the protocols and safety measures required for working at height. |
|                        | On 04/06/2024, the management issued warning letters to specific workers who failed to comply with the mandatory Personal Protective Equipment (PPE) requirements. This action underscores the company's commitment to enforcing safety regulations and maintaining a safe working environment.   |
|                        | A PPE checklist for the ramp station was sighted, confirming that the management conducts daily PPE inspections at the station. The checklist includes essential PPE items such as safety helmets, safety harnesses, lanyards, safety shoes, lifeline   |



| poles, and loading spikes. This routine inspection ensures that all safety equipment is in place and in good condition.  |
|--|
| During a site visit to the FFB Ramp, it was observed that the workers were appropriately equipped with PPE, including safety shoes and safety harnesses. Interviews with the workers demonstrated their awareness and understanding of the importance of using PPE, highlighting the effectiveness of the training sessions and safety protocols in place. Interview with the workers found that they are aware on the safety concern on the working at height. The workers also able to explain regarding the PPE importance as well as able to discuss the safety concern with the management team regarding the comfort of wearing the PPE while working. |
| The major non-conformance identified earlier has been addressed and is now closed. Further verification and assessments will be conducted in the next scheduled assessment.  |

| Non-conformity                             |   |   |   |  |              |                     |  |  |  |
|--|---|---|---|--|--------------|---------------------|--|--|--|
| NCR Ref #                                  | 2501725-202405-1  | N1 Is   | sued Date   |  | 31/05        | /2024               |  |  |  |
| Due Date                                   | " Next Assessment   | t Visit" CI   | osure Date  |  | "Open        | "                   |  |  |  |
| Indicator & Category<br>(Critical / Minor) | 2.2.2 – Minor   | 2.2.2 – Minor   |   |  |              |                     |  |  |  |
| Statement of Nonconformity:                | Compliance of app party contractor.   | licable legal r   | equirements was   | not fully o                              | demon        | strated by a third- |  |  |  |
| Requirement Reference:                     | applicable legal re-<br>Evidence of legal d<br>(licensed/ accred  | All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.  |   |  |              |                     |  |  |  |
| Objective Evidence:                        | Bahau Estate: Verification of a serification of | arch 2024 & not in-line with as following: YSM Enterprise of the second | April 2024 indica<br>n EPF Act 1991 - :<br>se<br>xxxx-xx-xxxx)<br>Employee's dedu | ated the<br>3 <sup>rd</sup><br>ction EPF | EPF's  Act 1 | contributions and   |  |  |  |
|  | Monthly wages entitled for EPF deduction Srd Schedule Amount EPF act 1991 - 3rd Schedule Amount EPF act 1991 - 3rd Schedule Amount  |   |   |  |              |                     |  |  |  |
|  | RM 2112.25 RM165.00 RM236.00 RM195.00 RM279.00 (Feb 2024)   |   |   |  |              |                     |  |  |  |



|              | RM 2116.87  | RM165.00  | RM236.00   | RM195.00   | RM279.00  |
|--------------|---|---|--|--|---|
|              | (Mar 2024)  |   |  |  |   |
|              | RM 2131.87  | RM165.00  | RM236.00   | RM195.00   | RM279.00  |
|              | (Mar 2024)  |   |  |  |   |
|              | dated 01/01/20 lords as follows the authorities to the contract again management of has been done buring site visit sugar, cooking of | nent between Bu<br>24 stated in claus<br>(j) to observe al<br>rom time to time<br>preement has be<br>IOI Plantations<br>on monthly basis<br>to grocery stor<br>oil and rice. Howe | se (1), the tenand rule and regules.  en signed by Methas established latest conducted latest, there is no | at hereby covenations imposed  dm. Nantihini A checklist for gro ed on 09/04/202 the grocery sto application of li | Market Enterprise ants with the lands by the landlord or A/P Sangaran. The ocery/canteen that 24 and 10/05/2024 ore has sell flour, censes to KPDNKK in the, Peraturan- |
|              | Peraturan Kawa <u>Bahau Estate</u> During a site vis  | lan Bekalan 1974<br>sit to the estate,<br>less licenses regi  | the auditor disc   | covered that the   | canteen operator<br>Kampung Lonek,  |
|              | Address: Pintu (Validity: until 28 According to an the licenses is n  | o: 202103064284<br>Gerbang Kampur<br>8/03/2025<br>interview with t  | ig Lonek, 72200<br>he canteen owr<br>ation. These indi   | ner, the business<br>cated that the c  | s registered under<br>compliance of legal   |
| Corrections: |   | ate – EPF's contr   |  |  |   |
|              | and inform<br>in accorda<br>Schedule.   | ed them to dedunce with the lega  | ct workers' mon<br>al requirements<br>cultation betwee   | thly salaries for<br>outlined in the I<br>n Sinar YSM an   | ar YSM Enterprise<br>EPF contributions,<br>EPF Act 1991 - 3rd<br>d EPF on 12 <sup>th</sup> July   |
|              | 2. Bukit Dind   | ng Estate – Gro   | cery Shop  |  |   |
|              |   | nagement had co<br>em on sustainabi   |  | -  | nant to advise and  |
|              | application<br>to align w   | on KPDNKK lice  | nse via online sy<br>quirements as p   | stem, namely E   | for the process of<br>BLESS 2.0 platform<br>Peraturan Kawalan   |



|                            | 3. | Bahau Estate – Canteen operator   |
|----------------------------|----|---|
|                            |    | Estate Management has made arrangement to assist the canteen operator to obtain accurate business licenses as required.   |
| Root Cause Analysis:       | 1. | Bahau Estate – EPF's contribution  Abdul Khalil, currently employed by Sinar YSM Enterprise, requested his employer to deduct his EPF contribution based on his basic salary. He made this request voluntarily, as indicated in his "Requisition Letter" dated 5 <sup>th</sup> January 2024. However, Abdul may be hesitant about this deduction due to immediate financial obligations, preferring to have a higher take-home pay for daily expenses.  Sinar YSM agreed to Abdul's request, believing there was no harm since the deduction was still based on basic wages. They misunderstood a previous government announcement, thinking employees could choose their EPF |
|                            |    | contribution amount.  Additionally, the employer's contribution is lower than required because EPF contributions are automatically calculated based on the salary declared in the EPF i-Akaun (Employer). Sinar YSM declared a salary of RM1500 for their workers, so the EPF system automatically calculated the contributions based on this amount.   |
|                            | 2. | Bukit Dinding Estate – Grocery Shop  The tenant did not comply with rules and regulations stated in Peraturan- Peraturan Kawalan Bekalan 1974, and was in breach of agreement between landlord and tenant due to misunderstanding and lack of knowledge about the specific goods that are regulated and require license form the authorities.   |
|                            | 3. | Bahau Estate – Canteen operator   |
|                            |    | Prior operating business as canteen operator in Bahau Estate, the canteen owner operated his business at Kampung Lonek, Bahau, Negeri Sembilan.  Though the canteen operator only operates his business in Bahau Estate for only about 3 weeks, there might be an administrative error where the update on business license was intended but not executed properly causing in delay in obtaining the correct registered business license  |
| <b>Corrective Actions:</b> | 1. | Bahau Estate – EPF's contribution   |
|                            |    | Estate management had communicated with Sinar YSM Enterprise to provide a copy of payslip and Borang A on monthly basis without fail to ensure that deductions are correct as mentioned on 3rd Schedule of EPF Act 1991.  |
|                            |    | Besides, an assistant manager is assigned by the Estate Manager to thoroughly check, monitor and acknowledge the EPF's deduction stipulated in the contractors' worker monthly payslip.   |
|                            |    | In addition, the sustainability department will conduct regular audits and monitoring visit to verify the consistency implementation of EPF's   |



|                        |    | deductions for all the contractors' workers as well as identifying and rectifying any discrepancies that may occur promptly.   |
|------------------------|----|--|
|                        | 2. | Bukit Dinding Estate – Grocery Shop  |
|                        |    | Estate management will clearly highlight all requirements to tenants during the due diligence process prior signing a contract and operating the business in the estate.   |
|                        |    | Meantime, estate management also will implement the current procedures and guidelines in a thorough manner and communicate with tenants if there is any change in law and contract.  |
|                        |    | Furthermore, sustainability team will conduct verification for all licenses and permits used by vendors or shop operators which also involve cross-checking the registered details with official record during internal audit and monitoring visits.         |
|                        | 3. | Bahau Estate – Canteen operator  |
|                        |    | In future, the estate management will conduct due diligence for all shop tenants prior operating business in the estate to ensure that vendor had met all the stipulated requirements.   |
|                        |    | Furthermore, sustainability team will conduct verification for all licenses and permits used by shop vendors or canteen operators which also involve cross-checking the registered details with official record during internal audit and monitoring visits. |
| Assessment Conclusion: |    | CAP was accepted, further verification will be conducted in the next essment.  |

| Non-conformity                             |  |              |        |
|--|--|--------------|--------|
| NCR Ref #                                  | 2501725-202405-N2  |              |        |
| Due Date                                   | " Next Assessment Visit"   | Closure Date | "Open" |
| Indicator & Category<br>(Critical / Minor) | 7.3.1 – Minor  |              |        |
| Statement of Nonconformity:                | The implementation of Waste Management Plans is not fully implemented.   |              |        |
| Requirement Reference:                     | A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.   |              |        |
| Objective Evidence:                        | During the site visit to the scheduled waste area at Bukit Dinding Estate, multiple pieces of scrap metal with oil and grease stains were found on the floor,. This is not in line with the established Waste Management Plan which stated the inside the plans and monitoring programs which is to provide spill kits and second containment. |              |        |
| Corrections:                               | The estate management had immediately transferred the scrap metals to a secondary container. Additionally, the contaminated soil has been collected and stored in the scheduled waste store and will be disposed as SW408.   |              |        |



| Root Cause Analysis:   | Though the risk and mitigation plan for the scrap iron with oil was mentioned in the latest revision of Environmental Impact Assessment dated 19.05.2024, there is no training program established to communicate the mitigation plans to the workshop attendant, whom as person in charge assigned by the estate management for the scrap iron handlers. |  |
|------------------------|---|--|
| Corrective Actions:    | Training on handling contaminated scrap iron will be added to the existing training need analysis and the latest revision of this training need analysis will be distributed to all operating units by email.   |  |
|                        | Training on handling contaminated scrap iron will be conducted to the workshop attendant.   |  |
|                        | Furthermore, sustainability team will revise the internal audit checklist by including this aspect.   |  |
| Assessment Conclusion: | The CAP was accepted, further verification will conducted in the next assessment.   |  |

| Oppor | Opportunity for Improvements   |  |  |
|-------|--|--|--|
| OFI#  | Description  |  |  |
| OFI 1 | 2501725-202405-I1  |  |  |
|       | Indicator 3.4.1  |  |  |
|       | Social impact assessment has been conducted by each operating units and has been reviewed on annual basis by the operating units. And has been documented in the "Social Impact assessment, Management action plans & continuous improvement plan". Positive and negative impact has been identified in the assessment. It can be further improved for the management to include guideline for sampling method for internal and external stakeholders' interview'.                                 |  |  |
| OFI 2 | 2501725-202405-I2  |  |  |
|       | Indicator 3.6.1  |  |  |
|       | (1) Location: Gomali POM   |  |  |
|       | In response to one of the recommendations in the latest CHRA Report, the mill management engaged Hygiene Technician 1 to conduct air monitoring on 06/05/2024. The purpose of this was to establish the baseline exposure level and potential exposure to Manganese and Iron Oxide, which are listed in Schedule 2 of USECHH Regulations 2000. The CHRA report specifies that the frequency of air contaminant monitoring should be determined based on the level of exposure obtained as follows: |  |  |
|       | • If the result of exposure is ≥ 8-hour TWA, monitoring frequency should be not more than once every 6 months.   |  |  |
|       | • If the result of exposure is above 50% of 8-hour TWA but below 8-hour TWA, monitoring frequency should be not more than once every 12 months.  |  |  |
|       | As of now, the mill management has not yet received the report on the air monitoring results conducted on 06/05/2024. Therefore, an OFI has been raised to follow up on this matter during the next audit. The specific point to verify is whether the subsequent frequency of air contaminant monitoring is not more than once every 6 months or not more than once every 12 months.  |  |  |
|       | (2) Location: Sagil Estate   |  |  |
|       | The Chemical Health Risk Assessment (CHRA) for Sagil Estate was conducted by HQ/22/ASS/00/00052 on 05/05/2024. The work unit that has been identified and assessed are Premix Operator, Spraying & Rat Baiting Operator (Oil Palm), Spraying Operator (Durian & Coconut), Spraying & Manuring Operator   |  |  |



(Intercrop), Geo Spray Operator, Turbomiser Operator, MB Power Spraying Operator, Scorpion Spraying Operator, Manuring & Rat Baiting Operator, Manuring Operator, Spreader Fertilizer Operator, Manuring Operator (Nursery), Spraying Operator (Nursery), Fogging Operator, Workshop Operator, Diesel Staff Attendant, Water Pump Attendant, Water Treatment Plant Operator, Cleaner Operator, and Storekeeper. As of now, the estate management has not yet received the full report of the assessment. Therefore, an OFI has been raised to follow up on this matter during the next audit.

#### OFI 3 2501725-202405-I3

Indicator 5.1.7

Location: Gomali Palm Oil Mill

Based on interviews and site visits, it was observed that one of the three weighbridges (Weighbridge No. 2) was not being utilized by the management for weighing purposes. The reason identified for this was the expiration of the calibration report for the weighbridge. Upon reviewing the documentation, it was confirmed that the calibration report for the weighbridge had indeed expired on 08/02/2024. However, it was also noted that the management has proactively reached out to one of the weighing and measuring equipment verification service providers appointed by the Federal Government of Malaysia through the Ministry of Domestic Trade and Cost of Living Affairs (KPDN) for recalibration purposes. Based on the communication between the management and the service provider, a date has been agreed upon for the recalibration, which is in Jun 2024. The progress of this OFI will be reviewed during the next audit.

#### OFI 4 2501725-202405-I4

Indicator 6.7.2

Location: Bukit Dinding Estate, and Sagil Estate

Hospital Assistants (HAs) from two of above-mentioned estates attended the First Aid & CPR Training organized by the Malaysian Red Crescent Society on 20/05/2024. As of the time of the audit, the certificates for these HAs were not yet available. The progress of this OFI will be reviewed during the next audit.

| Positiv | Positive Findings  |  |  |
|---------|--|--|--|
| PF#     | Description  |  |  |
| PF 1    | Good Commitment from the Management Team towards RSPO Certification.             |  |  |
| PF 2    | Good Implementation of Agronomic and Environmental Practices.                    |  |  |
| PF 3    | Good understanding by staffs and workers on GAP, H&S and Environment Protections |  |  |

#### 3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

| Previous Audit Minor Non-conformity        |                          |              |            |  |
|--|--------------------------|--------------|------------|--|
| NCR Ref #                                  | 2349260-202305-N1        |              |            |  |
| Due Date                                   | Next Assessment (ASA2_4) | Closure Date | 31/05/2024 |  |
| Indicator & Category<br>(Critical / Minor) | 3.3.2 - Minor            |              |            |  |



| Statement of Nonconformity: | Procedure on Shovel Operations and Linesite Inspection was not effectively implemented.   |  |  |
|-----------------------------|---|--|--|
| Requirement Reference:      | A mechanism to check consistent implementation of procedures is in place.   |  |  |
| Objective Evidence:         | Gomali POM  |  |  |
|                             | During site visit at Loading Ramp Gomali POM, it was observed that the shovel reverse censor does not work. It was not in line with SaOP Shovel dated 01/09/2022 E. "Sebelum Beroperasi (17) Periksa dan pastikan pengera amaran terutamanya hon kenderaan dan penggera amaran undur berfungsi dengan baik". Furthermore, based on the interview with the shovel driver, he mentioned that he was not provided with ear protection. Verified with HIRARC procedures dated 16/02/2023 Shovel stated as Existing Risk control on Noise was to use ear protection. |  |  |
|                             | Gomali Estate   |  |  |
|                             | During site visit to sundry shops, it has been found out roof damages at one of the shops (number#5) and as per interview with the shopkeeper, the issues has been prolonged, and he/she mentioned that the damage attract wild animal like snakes and bats.  |  |  |
|                             | Line site inspection procedures has been done on weekly basis by the management of estate and latest inspection has been done on 16/05/2023. However, roof damages at the sundry shops has not been highlighted in the line site inspection. It also contradicted with clause stated in the tenancy agreement procedures that;  - The landlord hereby covenants with the tenant as follows b) to maintain and keep the main structure and roof of said premises in good and tenantable repair condition throughout the period of agreement.                     |  |  |
| Corrections:                | Gomali POM  |  |  |
|                             | The shovel reverse sensor/alarm was replaced on the same afternoon as the audit.  |  |  |
|                             | 2. The Senarai Semak Pemeriksaan Shovel was revised by separating the "horn" and "reverse sensor/alarm" into 2 different rows to improve checking and repair  |  |  |
|                             | 3. Supervisors were told to ensure that inspections are effectively carried out before using shovels  |  |  |
|                             | 4. Supervisors were reminded to ensure that workers including shovel drivers use ear protection when they work at high noise areas like engine room, sterilizer, kernel plant and boiler  |  |  |
|                             | Gomali Estate   |  |  |
|                             | Estate management will make arrangement to carry out repairing work to repair the roof of the sundry shop.  |  |  |
|                             | Meanwhile, the estate management also will ensure the structure of building is safe before rental to the tenants.   |  |  |
| Root Cause Analysis:        | Gomali POM  |  |  |
|                             | Procedure on Shovel Operations and Linesite Inspection was not effectively implemented.   |  |  |
|                             | 1. As "horn & reverse alarm/sensor" were typed on the same row in the "Senarai Semak Pemeriksaan Shovel", the driver who inspected the shovel, ticked (•)   |  |  |



when he found that the horn was functioning, even though the reverse sensor was not functioning. The supervisor in charge also did not verify the inspection checklist.

2. As Gomali Palm Oil Mill's NRA report mentions that ear plugs are only compulsory in high noise areas like engine room, oil clarification room, press & threshing station, sterilizer station, boiler plant and kernel plant, we stated "use ear plug (if necessary)" in the HIRARC at all the stations. As the high noise stations were not specifically mentioned in the HIRARC, supervisors may misunderstand and not effectively implement ear protection procedures

#### Gomali Estate

Linesite inspection has been conducted on weekly basis by the Hospital Assistant or anyone appointed by the estate management.

However, the inspection checklist is more focus on employee housing and amenities. Therefore, there is no standalone checklist for inspection for sundry shop in the estate.

#### **Corrective Actions:**

#### Gomali POM

A memo dated 01/06/23 was issued to workers including shovel drivers and their supervisors to remind them to:

- 1. ensure that all shovels are effectively inspected by the respective drivers using the revised "Senarai Semak Pemeriksaan Shovel" and verified by the respective supervisors before they are used.
- 2. Supervisors and shovel drivers are to ensure that repairs especially to safety features like brakes, tyres, alarms, sensors, horns, lights etc. are resolved before shovel is used.
- 3. ensure that everyone who enters high noise areas use ear protection e.g., ear plugs, earmuffs

HIRARC is revised to mention specifically the following locations that require ear protection as per the NRA report:

- 1. Boiler plant
- 2. Kernel plant
- 3. Sterilizer station
- 4. Engine Room
- 5. Oil Clarification room
- 6. Press & threshing station

b) Memo was issued on 01/06/23 to remind workers and Supervisors to ensure that everyone entering high noise areas are provided with and use ear protection.

Please refer to the attachment:

Appendix 1 - Picture of shovel reverse alarm has been repaired/replaced

Appendix 2 - Revised "Senarai Semak Pemeriksaan" Shovel

Appendix 3 - Revised HIRARC

Appendix 4 – Memo on "Vehicle Inspection and Verification"

Appendix 5 – Memo on "Compulsory Usage of Hearing Protection"



|                        | Gomali Estate  |
|------------------------|--|
|                        | A new checklist was prepared to inspect the condition of canteen and grocery shop in the estate. This checklist was distributed via email to all operating units to carry out the inspections as required on monthly basis. This checklist is also included in Sustainability Filing System.   |
|                        | Please refer to the attachment:  |
|                        | Appendix 3.3.2 (1) Repair records of sundry shop   |
|                        | Appendix 3.3.2 (2) Sundry Shop Inspection checklist  |
|                        | Appendix 3.3.2 (3) Email distributed to all Operating Units on implementation of Sundry Shop Inspection checklist  |
| Assessment Conclusion: | During this Annual Surveillance Assessment (ASA 2_4), the following was verified:  |
|                        | G U DOM  |
|                        | Gomali POM:  (1) Sighted the inspection record Congreti Complete Remark Remarks and Charles Shovel.  |
|                        | (1) Sighted the inspection record <i>Senarai Semak Pemeriksaan Shovel</i> – Shovel Inspection Checklist dated 27/05/2024, which was verified by the supervisor before the shovels are used.  |
|                        | (2) Sighted PPE Issuance Record that respective workers that involved at high risk of noise area are provided with suitable PHP.   |
|                        | (3) HIRARC (Boiler Plant, Kernel Plant, Sterilizer Station, Engine Room, Oil Clarification Room, and Press & Threshing Station) that has been revised on 15/04/2024 are mentioned specifically the requirement of PHP as per the NRA Report.   |
|                        | Sagil Estate:  |
|                        | (1) Sighted latest inspection of <i>Kedai Runcit TTS</i> (Sundry Shop) dated 17/05/2024 by Sustainability Staff and Hospital Assistant, and verified by the Estate Manager. The inspection was recorded using latest checklist, namely Grocery/Canteen Checklist (Rev. No. 02, dated 01/08/2023).  |
|                        | (2) Sighted latest inspection of <i>Kedai Makan Aisyah</i> (Canteen) dated 17/05/2024 by Sustainability Staff and Hospital Assistant, and verified by the Estate Manager. The inspection was recorded using latest checklist, namely Grocery/Canteen Checklist (Rev. No. 02, dated 01/08/2023).  |
|                        | Based on the above findings, it was verified that the corrective actions taken were sufficient and effective, and they have been implemented accordingly. No similar non-compliance issues were identified during the Annual Surveillance Assessment (ASA 2_4). Therefore, the Minor NC raised during the Annual Surveillance Assessment (ASA 2_3) remains closed. |

| Previous Audit Opportunity for Improvement |                |  |
|--|----------------|--|
| OFI#                                       | Description    |  |
| OFI 1                                      | OFI Statement: |  |
|  | N/A            |  |



| Verification / Follow-up actions: |
|-----------------------------------|
| N/A                               |

#### 3.3.2 Summary of the Nonconformities and Status

| CAR Ref.          | Category<br>(Critical / Minor) | P&C<br>Indicator | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------------|------------------|-------------|-------------------------|
| 1929856-202006-M1 | Critical                       | 6.6.1            | 03/07/2020  | Closed on 15/09/2020    |
| 1929856-202006-M2 | Critical                       | 6.4.2            | 03/07/2020  | Closed on 15/09/2020    |
| 1929856-202006-M3 | Critical                       | 2.1.1            | 03/07/2020  | Closed on 15/09/2020    |
| 1929856-202006-M4 | Critical                       | 3.6.1            | 03/07/2020  | Closed on 15/09/2020    |
| 1929856-202006-N1 | Minor                          | 3.5.1            | 03/07/2020  | Closed on 16/07/2021    |
| 1929856-202006-N2 | Minor                          | 6.5.4            | 03/07/2020  | Closed on 16/07/2021    |
| 1929856-202006-N3 | Minor                          | 3.4.2            | 03/07/2020  | Closed on 16/07/2021    |
| 1929856-202006-N4 | Minor                          | 7.3.1            | 03/07/2020  | Closed on 16/07/2021    |
| 1929856-202006-N5 | Minor                          | 7.12.7           | 03/07/2020  | Closed on 16/07/2021    |
| 2076734-202106-N1 | Minor                          | 2.2.2            | 02/07/2021  | Closed on 27/05/2022    |
| 2076734-202106-N2 | Minor                          | 7.8.1            | 02/07/2021  | Escalated to major NC   |
| 2205750-202205-M1 | Major                          | 6.2.2            | 27/05/2022  | Closed on 17/08/2022    |
| 2205750-202205-M2 | Major                          | 2.1.1            | 27/05/2022  | Closed on 17/08/2022    |
| 2205750-202205-M3 | Major                          | 7.8.1            | 27/05/2022  | Closed on 17/08/2022    |
| 2205750-202205-N1 | Minor                          | 4.2.3            | 27/05/2022  | Closed on 26/05/2023    |
| 2205750-202205-N2 | Minor                          | 7.3.2            | 27/05/2022  | Closed on 26/05/2023    |
| 2205750-202205-N3 | Minor                          | 3.3.3            | 27/05/2022  | Closed on 26/05/2023    |
| 2349260-202305-N1 | Minor                          | 3.3.2            | 26/05/2023  | Closed on 31/05/2024    |
| 2501725-202405-M1 | Critical                       | 6.7.3            | 31/05/2024  | Closed on 24/07/2024    |
| 2501725-202405-N1 | Minor                          | 2.2.2            | 31/05/2024  | "Open"                  |
| 2501725-202405-N2 | Minor                          | 7.3.1            | 31/05/2024  | "Open"                  |

#### 3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Dynamic Plantations Bhd - Gomali 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   |  |  |  |  |
|--|--|--|--|--|
| <b>Type of Stakeholder</b> (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) |  |  |
| Neighbour Estate   | St. Helier Estate Sime Darby                                       | Face to face interview   |  |  |
| Local Community Representatives  | Taman Regent   | Face to face interview   |  |  |
| School Representatives   | SJKT Ladang Bahau<br>SJKC Central Site Gomali<br>SJKT Ladang Sagil | Face to face interview   |  |  |
| Vendors  | FFB Transporter<br>Contractor<br>Supplier                          | Face to face interview   |  |  |
| Gender Committee Representative  | Gender Committee Representative                                    | Face to face interview   |  |  |
| Local Workers Representative   | St. Helier Estate Sime Darby                                       | Face to face interview   |  |  |
| Foreign Workers Representative   | St. Helier Estate Sime Darby                                       | Face to face interview   |  |  |

| Stakeho | Stakeholders comment  |  |  |
|---------|---|--|--|
| 1       | Feedbacks: Neighbour Estate  Representatives from neighbouring estate confirmed the existence of good relationship between them and IOI estates. They use of same access road and contributions to road maintenance. Boundaries are clearly demarcated with no issues of overplanting or FBB thefts. They have invited to attend stakeholder consultation meeting and are aware of company policies, SOPs and are aware of the grievance procedure. |  |  |
|         | Audit Team verification and response:   |  |  |
|         | No further issue.   |  |  |
| 2       | Feedbacks: Local Community Representatives  |  |  |
|         | There are some of residences working in the estate. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that there are no operation or activities in estate that give adverse effect to the local communities. There are no cases of pollution has happened and identified by the villagers.   |  |  |
|         | Audit Team verification and response:   |  |  |
|         | No further issue.   |  |  |
| 3       | Feedbacks: School Representatives   |  |  |
|         | The representative from SJKC & SJKT provided positive feedback. He mentioned that the management conducted training for the stakeholders. Additionally, the management's consistent support for SJKC &  |  |  |



SJKT through CSR contributions. This positive feedback and strong communication indicate a healthy and productive relationship between estate and school.

#### **Audit Team verification and response:**

No further issue.

#### 4 Feedbacks: Vendors (FFB Transporter, Contractor & Supplier)

The contractor had given positive feedback about the training provided by management. He mentioned that the training covered important aspects such as policy, safety, environment, and social considerations related to the certification of RSPO and MSPO. He also demonstrated a good understanding of the minimum wage requirements and safety protocols. This indicates a positive outcome from the training session. Payments for all work done are received within the agreed timeframe, and there is no delay in payments. So far there have been any disputes or disagreements. Regularly submit necessary documents required by the certification units, such as monthly workers' payslips showing payment of minimum wages and statutory payments. Invited to attend stakeholder consultation meeting and are aware of Company Policies, SOPs and are aware of the grievance procedure.

#### **Audit Team verification and response:**

No further issue.

#### **5** Feedbacks: Gender Committee Representative

The representative from Gender Committee mentioned that the management has provided training to all employees, covering crucial aspects like safety, environment, and social considerations. Furthermore, it's noteworthy that the management is open to allowing employees to join any trade union, fostering a spirit of inclusivity and cooperation. This demonstrates a commitment to employee welfare and empowerment.

#### **Audit Team verification and response:**

No further issue.

#### **6** Feedbacks: Local & Foreign Workers Representative

No restriction to all employees to join union (NUPW). Companies paid part of NUPW's subscription monthly fees. They conveyed that the management upholds equal treatment for all employees, without any form of discrimination. Salaries are disbursed in accordance with the Employment Act of 1955 and the latest Minimum Wage Order. Furthermore, every employee retains the right to join any association of their choosing. The estate facilitates Social Dialogue Meetings, providing a platform for workers to openly discuss both work-related and social matters with the management. This open dialogue fosters a conducive environment for communication. Additionally, the workers are well-informed about the available channels for lodging complaints and grievances.

#### **Audit Team verification and response:**

No further issue.

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

Based on comprehensive desktop studies, there is no evidence of land ownership by other users or any customary right associated with the land currently under oil palm operations. The Unit of certification is in second generation of planting, with current landowner holder the ownership of property for more then 25 years. A review on the complaint an 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 assessment, including those with local



communities as maintain by BSI MY indicates 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 certification cycle to ensure comprehensive coverage.

#### Previous land owner / user comment

N/A

**Feedbacks:** Not applicable. All estates under IOI Gomali POM certification units had undergone 2<sup>nd</sup> cycle of replanting.

#### **Audit Team verification and response:**

Based on comprehensive desktop studies, there is no evidence of land ownership by other users or any customary right associated with the land currently under oil palm operations. The Unit of certification is in second generation of planting, with current landowner holder the ownership of property for more then 25 years. A review on the complaint an 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 assessment, including those with local communities as maintain by BSI MY indicates 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 certification cycle to ensure comprehensive coverage.

#### 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 Dynamic Plantations Bhd - Gomali Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Dynamic Plantations Bhd - Gomali Palm Oil Mill is remain certified.

| Report prepared by                          | Acceptance of Assessment Conclusion   |
|---|---|
| Name: AHMAD RUFI BIN ABU TALIB KHAN         | Name: MOHAMAD ZULKARNAIN BIN ZUBIR AHMADI   |
| Company Name: BSI SERVICES MALAYSIA SDN BHD | Company Name: IOI PLANTATION SERVICES SDN BHD   |
| Title: CLIENT MANAGER                       | Title: ASSISTANT MANAGER, SUSTAINABILITY  |
| Signature:                                  | Signature:  (I 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: 25/07/2024                            | Date: 25/07/2024  |



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

| Criterio  | on / Indicator  | Assessment Findings   | Compliance    |  |
|---|---|---|---------------|--|
| Principle 1: Behave ethically and transparently |   |   |               |  |
|   | on 1.1: The unit of certification provides adequate information in appropriate languages and forms to allow for effective participates. | to relevant stakeholders on environmental, social and legal issues relepation in decision making.   | evant to RSPO |  |
| 1.1.1   | (C) Documents that are specified in the RSPO P&C are made available to the public Critical (Major) compliance -                         | Documents specified for mill and all estates within Gomali POM Certification Unit (Gomali Grouping) made available as per sample as following:  - Land titles/user rights  - Occupational health and safety plans  - Plans and impact assessments relating to environmental and social impacts  - HCV documentation  - Pollution prevention and reduction plans  - Details of complaints and grievances  - Continuous improvement plans  - Public summary of certification assessment report  - Group Sustainability Policy  - Record of contributions to community development | Complied      |  |
| 1.1.2   | Information is provided in appropriate languages and accessible to relevant stakeholders.  - Minor compliance -                         | Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the estate and accessible to relevant stakeholders upon request. Sustainability policies were displayed in various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. In addition, IOI Group company's website also accessible with public information such as Sustainability Palm Oil Policy   | Complied      |  |

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|       |  | available via website link:  https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy.  There's also Grievance Procedure and Special Complaints information available via website link:  https://www.ioigroup.com/sustainability/grievances  Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.   |          |
|-------|--|--|----------|
| 1.1.3 | (C) Records of requests for information and responses are maintained Critical (Major) compliance -   | <ul> <li>Records of requests for information and responses are maintained as per sample as following:</li> <li>Bukit Dinding Estate records of response to request of SPAN Private Water Treatment permit for Private Water Treatment Facilities eCLAPS 6-monthly reports</li> <li>Stakeholder Interview Form Ref. # IOI/P/F/SIF; Rev. # 01; Issue date: 13/03/2020, sample of the interview form sighted is as the following:</li> <li>Surau Mashor dated 24/04/2024</li> <li>Bahau Estate – KKS Koh Foh dated 24/04/2024</li> <li>KLK – Ladang Ayer Hitam – 24/04/2024</li> <li>Jabatan Alam Sekitar (DOE) – 24/04/2024</li> <li>Stakeholder – Cheong Wing Chan Sdn Bhd</li> </ul> | Complied |
| 1.1.4 | (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.  - Critical (Major) compliance - | Explanation made mainly during stakeholder consultation meeting documented in Minutes of Meeting form; Doc. Rev. # 03; Issue date: 01/12/2021 as following:  - Bukit Dinding Estate; Stakeholder consultation meeting date: 23/04/2024  - Bahau Estate & Kuala Jelei Estate; Stakeholder consultation meeting date: 24/04/2024   | Complied |

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|       |   | - Regent Estate; Stakeholder consultation meeting date: 25/04/2024  |          |
|-------|---|---|----------|
|       |   | - Gomali POM; Stakeholder consultation meeting date: 25/04/2024   |          |
|       |   | - Sagil Estate; Stakeholder consultation meeting date: 29/04/2024   |          |
|       |   | Attendances of stakeholders' meetings conducted in all operating units recorded in Attendance List form; Doc. Ref. # IOI/P/F/AL; Rev. # 02; Issue date: 30/12/2020. Assistant Managers are the appointed Social Liaison Officer (SLO) in all operating units as per sample: |          |
|       |   | - Gomali POM Appointment Letter Date: 01/11/2023; SLO:<br>Mohanraaj Munisamy (Cadet Engineer)   |          |
|       |   | - Sagil Estate Appointment Letter Date: 01/07/2023; SLO: Muhammad Yunus Mustar (Assistant Manager)  |          |
|       |   | Sagil Estate workers' briefing; date: 29/02/2024, 01/03/2024 & 20/03/2024 of following:   |          |
|       |   | - Company Policies  |          |
|       |   | - Grievance/Complaints Procedure  |          |
|       |   | - Harassment Reporting Procedure  |          |
|       |   | - Home hygiene and Cleanliness  |          |
|       |   | - Induction & Post Arrival Interview  |          |
|       |   | - Employee Consultative Committee (ECC) & Joint Consultative Committee (JCC) Procedure  |          |
|       |   | - Payslip & Workers' Work verification  |          |
|       |   | - Vacation Leave Pay (VLP)  |          |
| 1.1.5 | There is a current list of contact and details of stakeholders and their nominated representatives.  - Minor compliance - | There are current lists of contact details of stakeholders and their nominated representatives documented in Stakeholders List; Doc. Ref. # IOI/P/F/EL; Rev. # 03; Issue date: 01/04/2024 as following:   | Complied |
|       |   | - Bukit Dinding Estate; Updated: 10/05/2024   |          |
|       |   | - Bahau Estate; Updated: 10/05/2024   |          |



| Criterio | on 1.2: The unit of certification commits to ethical conduct in all  | business operations and transactions.   |          |
|----------|--|---|----------|
| 1.2.1    | A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.  - Minor compliance - | The policy for ethical conduct is in place and implemented in all business operations as specified in Additional Requirements for Contractors and Services Provider; Ref. # 04; Issue date: 04/02/2024. The policy was briefed from time to time to vendors as per sample verified as following:  - Bahau Estate company policies briefing; date: 17/01/2024  | Complied |
|          |  | - Regent Estate contractor training; date: 06/02/2024   |          |
|          |  | - Sagil Estate company policies training; date: 04/03/2024  |          |
| 1.2.2    | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.  - Minor compliance -                     | The monitoring implemented via Contractor Document Checklist; Rev. # 03 Issue date: 30/12/2022 for sample contractor as following:  - Bukit Dinding Estate Contractor: Sinar YSM Enterprise; Contract # BDE/006-23/24 - Collecting Debris; Period: 01/07/2023 - 30/06/2024  - Bukit Dinding Estate Contractor: Kanapathy Manikam; Contract # BDE/002-23/24 - Grass Cutting; Period: 01/10/2023 - 30/06/2024  - Bahau Estate Contractor: Farm Chap Lee; Contract # BHE/001-23/24 - Hiring Backhoe; Period: 01/07/2023 - 30/06/2024  - Bahau Estate Contractor: Sinar YSM Enterprise; Contract # BHE/002-23/24 - Collecting Debris; Period: 01/07/2023 - 30/06/2024 | Complied |
|          |  | - Regent Estate Contractor: Kim Soon Lee Transport Sdn. Bhd.;<br>Contract # RGE/004-2324 — External FFB Transport; Period: 01/07/2023 — 30/06/2024  |          |
|          |  | - Regent Estate Contractor: SL Contract Works; Contract # RGE/009-23/24 – EFB Mulching; Period: 01/07/2023 – 30/06/2024   |          |



|          |  | - Sagil Estate Contractor: Metallic Milestone Sdn. Bhd.; Contract # RGE/009-23/24 — External FFB Transport; Period: 01/01/2024 — 30/06/2024  |          |
|----------|--|--|----------|
| Princip  | le 2: Operate legally and respect rights   |  |          |
| Criterio | on 2.1: There is compliance with all applicable local, national and                            | d ratified international laws and regulations.   |          |
| 2.1.1    | (C) The Unit of Certification complies with legal requirements - Critical (Major) compliance - | Individual operating unit demonstrated compliance against applicable legal requirements by obtaining and complying to the licenses and permits conditions as per samples as following: | Complied |
|          |  | Bukit Dinding Estate:  |          |
|          |  | - MPOB license # 501850402000; Exp. date: 30/09/2024   |          |
|          |  | - JTK salary deduction permit (electricity); Ref. # JTK.PHG600-2/11/3(35)  |          |
|          |  | - NUPW Subscription (Copy); Ref. # (20)dlm.BSM7/2/35/68 Jld.26   |          |
|          |  | - Diesel storage permit; Ref. # KPDNKK.PHG.RUB.600-5/4/041/JLDII; Exp. date: 20/07/2025  |          |
|          |  | - Petrol storage permit; Ref. # KPDNHEP.PHG.RUB.600-5/5/557; Exp. Date: 04/02/2024   |          |
|          |  | - Air Compressor CF Ref. # PH/ML/23/12725 (PMT-PH/2366004);<br>Exp. date: 15/11/2024   |          |
|          |  | - SPAN Private Water Treatment Plant Permit Ref. # LK/3/22/00088;<br>Validity period: 14/07/2022 – 13/07/2025  |          |
|          |  | Bahau Estate:  |          |
|          |  | - MPOB license # 586370102000; Exp. date: 30/06/2024; Estate area: 3,028.76 ha   |          |
|          |  | - JTK salary deduction permit (TNB electricity); Ref. # PMT 10502/2022/0012(3); Validity period: 23/10/2022 – 22/10/2025   |          |



- JTK salary deduction permit (SAINS water); Ref. # PMT 10502/2022/0013(3); Validity period: 23/10/2022 22/10/2025
- Diesel (Euro 5) storage permit; Ref. # KPDNKP.600-2/26/60; Exp. date: 17/01/2025; Quantity: 18,000 litres
- Petrol (RON 95) storage permit; Ref. # KPDNKP.600-2/28/73; Exp. date: 01/05/2025; Quantity: 100 litres/day
- Water Abstraction License # AP(K) 0123; Reg. # 700-11/2/1-209;
   Validity period: 01/01/2023 31/12/2024; Volume: 58,598.00 m<sup>3</sup>/year

#### Regent Estate:

- MPOB license # 586619002000; Exp. date: 30/06/2024; Estate area: 2,296.98 ha
- JTK salary deduction permit (TNB electricity); Ref. # PMT 10501/2024/0031(4); Validity period: 04/04/2024 03/04/2027
- JTK salary deduction permit (SAINS water); Ref. # PMT 10501/2024/0030(4); Effective date: 04/04/2024
- Diesel (From licensed dealer) storage permit; Ref. # KPDNHEP(NS)600-3/3/17-SK031991; Exp. date: 05/10/2024; Quantity: 18,000 litres
- Compressor (Air Receiver Tank) DOSH Certificate of Fitness Reg. # NS PMT 4320; Validity Period: 03/08/2023 – 02/11/2024

#### Gomali POM:

- MPOB license # 500117204000; Exp. date: 31/01/2025
- DOE license # 004713; Validity period: 01/07/2023 30/06/2024
- DOSH Boiler Reg. # PMD 14575; Validity period: 05/09/2023 04/02/2025
- BAKAJ Water Abstraction License # 334/300/5/6/8/8; Validity period: 01/01/2024 31/12/2024



|       |  | Sagil Estate:   |          |
|-------|--|---|----------|
|       |  | - MPOB license # 586841002000; Exp. date: 30/06/2025  |          |
|       |  | <ul> <li>Diesel (From licensed dealer) storage permit; Ref. # KPDNHEP(NS)600-6/5/19-J002769; Exp. date: 29/09/2024; Quantity: 18,000 litres</li> <li>Compressor (Air Receiver Tank) DOSH Certificate of Fitness Reg. # PMT JH/1974353; Validity Period: 21/04/2023 – 20/09/2024</li> </ul>                |          |
| 2.1.2 | A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.  - Minor compliance - | Documented system for ensuring legal compliance and to track changes of laws and regulations established as Mechanism for Tracking Changes in Law; Rev. date: 30/01/2020. Compliance monitoring mainly conducted by appointed PIC as Legal Liaison Officer in individual unit as per sample as following: | Complied |
|       |  | - Appointment as Legal Liaison Officer for Bahau Estate of Mohd. Azri<br>Ridzwan; Assistant Manager; Appointment letter date: 10/10/2021  |          |
|       |  | The Legal Liaison Officer conducting the evaluation that ensuring compliance via documented monitoring form as per sample as following:   |          |
|       |  | - Evaluation of License and Permits; Rev. # 05; Issue date: 01/01/2024; Bukit Dinding Estate latest evaluation of compliance date: 07/02/2024   |          |
| 2.1.3 | Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.        | The management has established the border area for all the estate visited. Verified that there are no planting over the legal authorised boundary. Sample of the estate boundaries visited is the followings:   | Complied |
|       | - Minor compliance -   | 1. Bahau Estate – Block PR22A – Smallholder   |          |
|       | ·  | 2. Bahau Estate – Block PM21D – Sungai Sebaling Estate  |          |
|       |  | 3. Bahau Estate – Block 19C – IOI Properties – Bandar IOI   |          |
|       |  | 4. Bukit Dinding Estate – Block PM01H – Sungai Pertang Estate<br>Div A  |          |

| Criterio | on 2.2: All contractors providing operational services and supplyi  | <ol> <li>Bukit Dinding Estate – Block PM01H – Sungai Pertang Estate Div B</li> <li>Bukit Dinding Estate – Block PM01G – Village</li> <li>Regent Estate – Block PR22B – Tebong Forest Reserve</li> <li>Regent Estate – Block 20B – Batang Melaka Estate</li> <li>Regent Estate – Block 20A – Kemuning Estate</li> <li>Sagil Estate – Block PM 20E – Taman Lagenda Gunung Ledang</li> <li>Inglabour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal required</li> </ol> | rements.           |
|----------|---|---|--------------------|
| 2.2.1    | A list of contracted parties is maintained.  - Minor compliance -   | The management has established the list of stakeholders there were information regarding of name, address, telephone number for contractor, supplier, government agency, industry, head of committee surrounding and schools. The details were maintained in a register entitled List of Stakeholders as per sample as following:  - Bukit Dinding Estate; Update: 10/05/2024  - Bahau Estate; Update: 10/05/2024  - Regent Estate; Update: 10/05/2024                          | Complied           |
| 2.2.2    | All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.  Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.  - Minor compliance - | Bahau Estate:  Verification of a sample contractor's worker pay documents for the month of February 2024, March 2024 & April 2024 indicated the EPF's contributions and deductions were not in-line with EPF Act 1991 - 3rd Schedule Amount as following:  Contractor: Sinar YSM Enterprise  Contract: Transport, Labour, Material & Provide Main Rubbish Bin Worker: Abdul Khalil (ID # 95xxxxx-xxxxx)   | Non-<br>compliance |



| Monthly<br>wages<br>entitled for<br>EPF | Employee's deduction | EPF Act 1991<br>- 3rd<br>Schedule<br>Amount | Employer's contribution | EPF Act<br>1991 - 3rd<br>Schedule<br>Amount |
|---|----------------------|---|-------------------------|---|
| RM 2112.25<br>(Feb 2024)                | RM165.00             | RM236.00                                    | RM195.00                | RM279.00                                    |
| RM 2116.87<br>(Mar 2024)                | RM165.00             | RM236.00                                    | RM195.00                | RM279.00                                    |
| RM 2131.87<br>(Mar 2024)                | RM165.00             | RM236.00                                    | RM195.00                | RM279.00                                    |

#### **Bukit Dinding Estate**

Contract agreement between Bukit Dinding Estate and S.P Mini Market Enterprise dated 01/01/2024 stated in clause (1), the tenant hereby covenants with the lands lords as follows (j) to observe all rule and regulations imposed by the landlord or the authorities from time to time. The contract agreement has been signed by Mdm. Nantihini A/P Sangaran.

The management of IOI Plantations has established checklist for grocery/canteen that has been done on monthly basis latest conducted on 09/04/2024 and 10/05/2024

During site visit to grocery store, sighted that the grocery store has sell wheat flour, sugar, cooking oil and rice. However, there is no application of licenses to KPDNKK has been made. This not complied with the requirement stated in the, Peraturan-Peraturan Kawalan Bekalan 1974 (PPKB 1974)

| 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.  - Minor compliance -  | Bahau Estate  During a site visit to the estate, the auditor discovered that the canteen operator was using business licenses registered to a different address in Kampung Lonek, Bahau, Negeri Sembilan. Details as per below Registrations No: 202103064284  Address: Pintu Gerbang Kampung Lonek, 72200, Batu Kikir, Negeri Sembilan  Validity: until 28/03/2025  According to an interview with the canteen owner, the business registered under the licenses is no longer in operation.  These indicated that the compliance of legal requirement was not fully demonstrated. Hence, a Minor NC has been raised.  All contractors are required to sign the Additional Requirements for Contractors and Services Provider; Ref. # 04; Issue date: 04/02/2024 which clearly specified that the vendors are required to adhere disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. | Complied |
|----------|---|--|----------|
| Criterio | on 2.3: All FFB supplies from outside the unit of certification are   | from legal sources.  |          |
| 2.3.1    | <ul> <li>(C) For all directly sourced FFB, the mill requires:</li> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> <li>Critical (Major) compliance -</li> </ul> | Gomali Palm Oil Mill has adopted the Identity Preserve Supply Chain Module, demonstrating a commitment to sustainability. The audit confirmed that the mill exclusively receives RSPO-certified Fresh Fruit Bunches (FFB) from the designated Supply Base, which is Gomali Estate, Paya Lang Estate, Tambang Estate, Sagil Estate, Regent Estate, Bahau Estate, Kuala Jelei Estate, Bertam Estate, Jasin Lalang Estate, Bukit Dinding and Bukit Serampang as well as certified RSPO Estate from other certification unit within the IOI Group. The mill provides comprehensive and transparent documentation, ensuring traceability  | Complied |

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|  | of the FFB supply chain. All relevant information on the direct sources of FFB is readily available for verification, highlighting Gomali Palm Oil Mill's dedication to ethical and sustainable practices in the palm oil industry.  Sample taken is as the following:   |  |  |   |  |
|--|--|--|--|---|--|
|  | Estato   | Coord  | dinate   | MPOR License  |  |
|  | Estate   | Latitude   | Longitude  | MPOB Licerise   |  |
|  | Regent Estate  | 2°30'50.06"N   | 102°24'16.08"E   | 586619002000  |  |
|  | Bahau Estate   | 2°48'32.06"N   | 102°26'55.04"E   | 589082011000  |  |
| For all indirectly coursed EER, the unit of certification obtains  | The mill receives  | t the EEP from a   | roup octato thus   | thoro is no indirect  | Complied   |
| from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.  - Minor compliance -  | FFB source obtained from any suppliers.  |  |  |   | Complied   |
| le 3: Optimise productivity, efficiency, positive impacts a  | and resilience   |  |  |   |  |
| on 3.1: There is an implemented management plan that aims to   | achieve long-term  | economic and fi  | nancial viability.   |   |  |
| (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.  - Critical (Major) compliance - | sustainability<br>implementation<br>robust business<br>Business Plan,<br>FY23/24 (Estima   | and continuou<br>of a Capital Exp<br>plan. This busin<br>spans five finar<br>te), and FY24/25  | us improvemei<br>enditure (CAPEX)<br>ness plan, referre<br>ncial years, i.e.,<br>5 – FY26/27 (Proj   | nt through the programme and a ed to as the 5-Year FY22/23 (Actual), ection).   | Complied   |
|  | evidence as listed in Indicator 2.3.1.  - Minor compliance -  le 3: Optimise productivity, efficiency, positive impacts a poin 3.1: There is an implemented management plan that aims to (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. | For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.  - Minor compliance -  Ie 3: Optimise productivity, efficiency, positive impacts and resilience on 3.1: There is an implemented management plan that aims to achieve long-term documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.  - Critical (Major) compliance -  or GFFB is readily Mill's dedication industry.  Sample taken is  Estate  Regent Estate  FFB source obtains  FFB source obtai | of FFB is readily available for veri Mill's dedication to ethical and sindustry.  Sample taken is as the following:  Estate Coord  Latitude  Regent Estate 2°30'50.06"N  Bahau Estate 2°48'32.06"N  For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.  - Minor compliance -  Ite 3: Optimise productivity, efficiency, positive impacts and resilience  On 3.1: There is an implemented management plan that aims to achieve long-term economic and find the complex of a | of FFB is readily available for verification, highlight Mill's dedication to ethical and sustainable pract industry.  Sample taken is as the following:    Coordinate | of FFB is readily available for verification, highlighting Gomali Palm Oil Mill's dedication to ethical and sustainable practices in the palm oil industry.  Sample taken is as the following:    Estate     Coordinate   Latitude   Longitude   Regent Estate   Latitude   Longitude   Longitude   Longitude   Longitude   Longitude   Regent Estate   Latitude   Longitude   Lo |

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| (2) CPO and PK Production   |
|---|
| (3) General Charges & RSPO Budget   |
| (4) Capital Expenditure   |
| (5) Palm Oil Mill Expenditure   |
| (6) Summary Graph:  |
| Crop (FFB)  |
| OER & KER   |
| Cost per MT/ Production   |
| For the respective estates, the main components of the Business Plan include:   |
| (1) Area Statement  |
| (2) Crop (FFB) by Year of Planting  |
| (3) Crop (FFB) Monthly Breakdown  |
| (4) Replanting Programme  |
| (5) Summary Replanting Programme by Field   |
| (6) Detail Replanting Programme by Field  |
| (7) Executive/Staff and Workers Requirement   |
| (8) Mature Oil Palm Costing Statement   |
| (9) General Charges Statement (including Environment, Social, OSH, and Training & Promotion)                                |
| (10) Capital Expenditure Statement  |
| (11) Summary Replanting Cost  |
| The respective Mill and Estates' Managers have been actively monitoring the operational performance against Key Performance |

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|       |  | Indicators (KPIs) and targets, which include costs, FFB yields, quality, productivity, pesticides usage, fertilizers usage, etc. Records verifying the monitoring of costs against budget to achieve specified targets were found to be available.  Performance discussions are held in monthly meetings at the UoC, where issues are identified, actions are planned, and follow-ups are recorded. The records of these meetings were available and verified |          |          |          |          |          |  |
|-------|--|---|----------|----------|----------|----------|----------|--|
|       |  | during the audit. Reports on a monthly, quarterly, half-yearly, and yearly basis are submitted to the Plantation Controller and IO: Headquarters.   |          |          |          |          |          |  |
| 3.1.2 | An annual replanting programme projected for a minimum of five years with yearly review, is available.  - Minor compliance - | The group I programs a Managers a replanting pobserved for year, with incorporate The replant   | Complied |          |          |          |          |  |
|       |  |   | FY 24/25 | FY 25/26 | FY 26/27 | FY 27/28 | FY 28/29 |  |
|       |  |   | (Ha.)    | (Ha.)    | (Ha.)    | (Ha.)    | (Ha.)    |  |
|       |  | Bkt<br>Dinding<br>Estate  | 112      | 189      | 248      | 236      | 113      |  |
|       |  | Bahau<br>Estate   | 0        | 0        | 0        | 0        | 0        |  |
|       |  | Regent<br>Estate  | 114      | 161      | 72       | 174      | 150      |  |

|       |  | Sagil<br>Estate   | 256                          | 95                       | 212                      | 101                         | 0   |  |
|-------|--|---|------------------------------|--------------------------|--------------------------|-----------------------------|---|--|
|       |  | Despite the yearly review, the actual execution of replanting activities is subject to approval from the IOI Group Top Management. This ensures that replanting decisions align with the overall strategic direction and priorities set by the top management of the IOI Group.   |                              |                          |                          |                             |   |  |
| 3.1.3 | The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.  - Minor compliance - | The management of Gomali POM UoC is committed to conducting the Management Review Meeting (MRM) at least once a year, following the internal audit and preceding the external audit. The most recent MRM for Gomali POM UoC was conducted on 02/05/2024. The meeting was chaired by the Plantation Controller and attended by key personnel of the grouping, including the Mill Manager, Estate Manager(s), Senior Manager of Sustainability, Senior Manager of Safety, Assistant Manager of Sustainability, Sustainability Executive(s), Mill Assistant Manager(s), Estate Assistant Manager(s), and the Sustainability Person-In-Charge for each operating centre.  The meeting covered a range of topics, including the results of the |                              |                          |                          |                             | Complied  |  |
|       |  | internal an<br>estates, cu<br>mill and es<br>MRM issues<br>on the action<br>necessary f   |                              |                          |                          |                             |   |  |
|       |  | the basis fo<br>The plan  | r the Contin<br>also include | uous Impro<br>es the nec | vement Pla<br>essary res | n (CIP) for F<br>ources and | and used as FY2024/2025. If support to cations to the |  |

|       |   | The minutes of the MRM are available for review upon request. Overall, the MRM was found to be effectively conducted.   |              |
|-------|---|---|--------------|
|       | on 3.2: The unit of Certification regularly monitors and reviews lans that allow demonstrable Continuous improvement in key ope   | their economic, social and environmental performance and develops an erations.  | d implements |
| 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 - | The continuous improvement plan is available for review at each site. The continuous improvement plan objectives is as per the IOI Policy and Guidelines is as per the following  1. To achieve at least 30% increase in barn owl population by building new and maintain old ones  2. To implement 40 solar technologies for street light to reduce electricity consumption by 5%  3. To increase the usage of EFB is organic by 20% following StOP standards.  The continuous improvement programmes is as the following:  1. To minimize the pollution and GHG emission risk by monitoring the effectiveness of diesel usage by vehicles and machineries  2. Maintain and monitor diesel usage of vehicles effectively to reduce the GHG  3. To continue regular services of vehicle for smooth running engines  4. To ensure to have a long term road maintenance management  5. To utilize electrical mechanical cart rather than diesel | Complied     |
| 3.2.2 | As part of the monitoring and continuous improvement process,   | mechanical cart  The UoC has submitted RSPO P&C Metrics prior to the audit conducted  | Complied     |
| 3.2.2 | annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].   | and verified that the template that has been used are Version 2.1   | 33piid       |



#### **PROCEDURAL NOTE:**

The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.

Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.

- Minor Compliance -

(Updated June 2021), and all information filled-in the template are reflecting each operating unit of UoC.

Annual Communication of Progress (ACOP) reporting for year 2022 of IOI Group has been submitted to RSPO Secretariat and publicly available at <a href="https://rspo.org/members/2-0002-04-000-00/">https://rspo.org/members/2-0002-04-000-00/</a>

PalmGHG data for this UoC has been submitted using PalmGHG Version 4 to the BSI Assessment Team prior to the audit and was subsequently approved after onsite verification.

#### **Criterion 3.3:** Operating procedures are Appropriately documented, consistently implemented and monitored.

- 3.3.1 **(C)** Standard Operating Procedures (SOPs) for the unit of certification are in place.
  - Critical (Major) compliance -

Each operating centre of Gomali POM UoC maintains a set of Standard Operating Procedures (SOPs), which have been verified to be in order. The POM has documented SOPs for its operations, which include:

- (1) Group Standard Operating Procedures for Palm Oil Mil (Revised in 2017) – This covers various operations such as FFB Reception, FFB Handling, Sterilizer, Threshing, Digestion and Pressing, Oil Room, Depericarper, Nut and Kernel Plant, Products Storage and Despatch, Laboratory, Effluent Treatment Plant, Biogas Plant, Water Treatment Plant, Boiler, Engine Room, Workshop, and Shovel. This document was revised on July 1, 2017 (Issue 02).
- (2) Safe Operating Procedures (SaOP) This SaOP outlines safe working practices in the POM, including hazards identification, risk audit, and control measures. The hazards include noise, chemicals, heat, fire, fuel spillage, working at heights, working in enclosed space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc., and a "permit to work system" for the mill.
- (3) SOP for Supply Chain documented as RSPO Supply Chain Module D CPO Mills: Identity Preserved (IP), (RSPOSC/SOP /IP/3, Revision 11, dated 01/11/2023)

Complied

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Similarly, the estates have the following SOPs for operational guidance:

- (1) Standard Operating Procedures (SOP) for Estate Operations (revised in 2020) This cover operations such as Planting Density, Nursery, Land Clearing and Preparation, Planting Technique, Tidal Gates, Manuring, Pest and Disease, Harvesting, Weeding, Road Maintenance, Workshop, Buffalo Healthcare, Foliar Sampling and Soil Sampling, Management and Monitoring of Existing Cultivation of Oil Palm on Peat.
- (2) Safe Operating Procedures (SaOP) latest revised on 01/09/2022.

In addition, the Gomali POM and Gomali Estate are certified against OHSMS ISO 45001:2018. The relevant documents (IOI/OHSMS, Rev. No. 00, dated 01/09/2022) include manuals and procedures for Management Review, Internal Audit, Documented Information, Nonconformity & Corrective Action, Continual Improvement, Organizational Context, Internal & External Issues, OHS Risk & Opportunity Management, HIRARC, OHS Legal & Other Requirements, OHS Internal Communication, OHS External Communication, OHS Operational Planning & Management of Change, OHS Roles & Responsibilities, Workers Consultation & Participation, Chemical management & Control, Emergency Response, OHS Monitoring, Measurement & Analysis, OHS Training, Competence & Awareness, OHS Purchasing Control, Accident/Incident Investigation & Reporting.

Relevant Key Performance Indicators (KPIs) are specified for quality, environment, safety, and cost control at both the POM and estates.

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|       |   | SOPs are documented in English, dated, and approved by management. They are also translated into Bahasa Malaysia for easier understanding by workers. SOP copies are distributed, posted, laminated, and made highly visible and easily accessible at all operation sites.  |          |
|-------|---|---|----------|
|       |   | Interviews conducted and training records sighted confirm that staff/workers have a clear understanding of the SOPs. This comprehensive approach ensures that all operations adhere to the highest standards of quality, safety, and sustainability. The minutes of these meetings are available for review upon request. This demonstrates the commitment of Gomali POM UoC to transparency and continuous improvement.  |          |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place.  - Minor Compliance - | The implementation of SOPs at Gomali POM UoC has been consistently performed and verified. Records of implementation, including system monitoring through internal audits and operational activities such as daily, weekly, and monthly field inspections, were meticulously reviewed. It was confirmed that monitoring was conducted by trained and competent personnel, such as the Sustainability Team for the sustainability internal audits, and Field Supervisors and experienced Mandores for field operations. These records, which monitor procedures and work progress, were diligently maintained by staff for each operation and regularly checked and verified by both the Assistant Manager and the Manager.  Estates and mill management have adopted practices to ensure consistent implementation of procedures. This includes visits from top | Complied |
|       |   | management, such as the Plantation Director, Plantation Controller, and government agencies, primarily JTK, DOSH, and DOE.  An RSPO Internal Audit was conducted end of March 2024, by seven (7) internal auditors from the Sustainability Department – Peninsular  |          |

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|       |   | Region. As evident from the NC Letter issued by the Sustainability   |          |
|-------|---|--|----------|
|       |   | Department – Peninsular Region which include the detail of non-conformities, root cause and corrective actions. Thus, it is verified that all internal audit findings were thoroughly evaluated, and adequate corrective actions were taken on non-conformances. The report was made available and discussed during Management Review Meetings.  |          |
|       |   | In addition to the RSPO Internal Audit, Corporate Internal Audits were conducted by the Internal Audit Department of IOI HQ, and the Safety, Health & Environment Department also conducted Internal Audits. The audit reports were documented and made available during the audit for review by management.   |          |
|       |   | Gomali Estate and Gomali POM underwent an audit from 08/05/2023 to 10/05/2023 for the ISO 45001:2018 certification and obtained the certificate.   |          |
| 3.3.3 | Records of monitoring and any actions taken are maintained and available.  - Minor Compliance - | Records of monitoring and actions taken have been meticulously maintained for more than 12 months at both the mill and estates. Daily muster chits and briefing records were readily available at the POM and estates, providing a clear record of daily activities and discussions.   | Complied |
|       |   | During the on-site inspection at the POM and audited estates, actual operational and field activities were verified. This included monitoring records on spraying, manuring, and harvesting operations at the estates, and mill monitoring records on daily production reports (including FFB processed/ramp balance, throughput/starting & stopping time), boiler monitoring sheets, daily notification reports (machinery status), and daily supervision and walkabouts by Supervisors and Assistant Managers. These records were maintained and available during the assessment at the estates and mill, demonstrating a commitment to transparency and accountability. |          |

|       |   | Describe of white from the manner and an arrange of  |                |
|-------|---|--|----------------|
|       |   | Reports of visits from top management and government agencies were also maintained by the estates and mill management, providing further evidence of oversight and engagement with key stakeholders.   |                |
|       |   | The Management Review Meeting minutes, which are properly maintained, showed that the input from the internal audit findings was discussed to identify the effectiveness of the implementation of the RSPO P&C requirement. This demonstrates a commitment to continuous improvement and adherence to RSPO standards.  |                |
|       |   | The ISO 45001:2018 certificates for Gomali Estate (Certificate No. O-213/23(b), valid until 20/06/2026) and Gomali POM (Certificate No. O-213/23(a), valid until 20/06/2026) were sighted, confirming their commitment to occupational health and safety management.   |                |
|       |   | The on-site audit confirmed that the records were satisfactorily maintained, demonstrating Gomali POM UoC's commitment to robust record-keeping practices and adherence to established standards and procedures.   |                |
|       | on 3.4: A comprehensive Social and Environmental Impact Assemental management and monitoring plan is implemented and regu   | essment (SEIA) is undertaken prior to new plantings or operations, and ularly updated in ongoing operations.   | l a social and |
| 3.4.1 | (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.  - Critical (Major) compliance - | There is no new planting within any of the units under Gomali Mill and its supply base. However, a Social Impact Assessment Management Actin Plans & Continuous Improvement Plans were developed for each operating unit by the Sustainable Palm Oil Department team in collaboration with the respective managers and assistant managers. These assessments were undertaken with the participation of affected stakeholders. Please see Indicators 3.4.2 and 3.4.3 below. | OFI            |
|       |   | Environmental Impact Assessment (EIA) Gomali Palm Oil Mill and Supply Bases has been prepared FY 2024. The Environment Impact Identification was conducted with reference to the following:  |                |

|       |  | <ol> <li>Identification</li> </ol>  | tion and Management of Waste              |   |          |
|-------|--|---|---|---|----------|
|       |  | 2. Identifica   | tion and management Plan for Potential Po | ollutants   |          |
|       |  | 3. Identifica   | tion of Side Products                     |   |          |
|       |  | 4. Identifica   | tion of Integrated Pest management        |   |          |
|       |  | 5. Impact of  | Replanting and management plan            |   |          |
|       |  | 6. Road con   | struction, culvert maintenance and bridge |   |          |
|       | 7. Water management  |   |   |   |          |
|       |  |   |   |   |          |
| 2.4.2 |  | and has beer<br>existing opera<br>Impact Asse<br>Improvement<br>Manager in e<br>been identifie<br>improved for<br>method for in<br>OFI has been |   | ting units for<br>ted as Social<br>Continuous<br>dapproved by<br>e impact has<br>can be further<br>for sampling<br>w'. Hence an |          |
| 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. | Based on SIA, established as Social Program for the year 2024 for all estates and mill as following:  |   |   | Complied |
|       | - Minor Compliance -   | Social<br>Training  | Programs                                  | Frequency   |          |
|       |  | Trailing  | Contractors' sustainability training      | Annual  |          |
|       |  |   | Induction & employee declaration          | As needed   |          |
|       |  |   | Company's policies & guidelines           | Annual  |          |



|  | ·         |  |           |
|--|-----------|--|-----------|
|  |           | Payslip & workers' work verification       | Annual    |
|  |           | Vacation leave pay (VLP)                   | Annual    |
|  |           | Grievance & complaints procedure           | Annual    |
|  |           | Home hygiene & cleanliness                 | Annual    |
|  |           | Sexual harassment & reporting procedure    | Annual    |
|  | Housing & | Workers' housing & amenities               | As needed |
|  | Amenities | Creche                                     | As needed |
|  | Social    | SIA & Social management                    | 6-monthly |
|  | Programs  | Social mitigation & continuous improvement | 6-monthly |
|  |           | Stakeholders' consultation                 | Annual    |
|  |           | Workers' joint consultative committee      | 2-monthly |
|  |           | Women empowerment committee                | 6-monthly |
|  |           | Canteen operators & grocery shop keepers   | 6-monthly |
|  |           | Social activities                          | As needed |
|  | Legal     | Evaluations of compliance                  | Monthly   |
|  | Programs  | Legal register                             | As needed |

|       |   |   |  |   | <u></u> |
|-------|---|---|--|---|---------|
|       |   |   | Prevailing wages monitoring  | Monthly   |         |
|       |   | Environment   | Evaluation of Environment Compliance   | Monthly   |         |
|       |   |   | HCV Maintenance  | Continous   |         |
|       |   |   | Water pond maintained and no spraying activities conducted   | Continous   |         |
|       |   |   | To Ensure water fileration system is in good condtion and records the chemical usage   | Continous   |         |
|       |   |   | Water sampling activities  | Quarterly   |         |
|       |   |   | Avoid purchasing second grade diesel from unauthorized dealer that contains high sulphur   | Continous   |         |
| 3.4.3 | (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.  - Critical (Major) compliance - | impact to the annually. The mitigation ac monitoring im The impletate management partipatory in (Review Document) | nent plan established base on operation we environment. The management plan we management plan stated the environment. The management plan and person resplementation.  ion and plans are according to 3.4.2 at each operating has conducted the manner. Assessment And Management planent) latest dated May 2024 respective 2024 – 21/05/2024. The management Planent | was reviewed mental issue, sponsible for 2. whilst the e plan in a Action Plans ely for every |         |
|       |   | Management  | mprovement Plan, Waste management Plan, and HCV Management Plan.  e water management plan is taken as the  | ,   |         |
|       |   | Sample on the   | water management plan is taken as the  | ionowing.   |         |



Water Management Plan 2024 for the estates has been established with the latest review dated 19/05/2024. This is compiled on Group basis and amended to meet demands of specific issue in the estates.

The estates recorded the water usage and sources of supply. Details as follows. Except for Bukit Dinding Estate and Sagil Estate having own water treatment plant for the domestic use, others estates received supply for the state government supply i.e SAINS and SAJ respectively for Negeri Sembilan and Johor

| Bukit Dinding | July 20-June 21 | July 21-June 22 | July 22-June 23 |
|---------------|-----------------|-----------------|-----------------|
| Water m3      | 21992           | 25009           | 23430           |
| FFB /mt       | 31244           | 24429           | 19171           |
| Water /FFB mt | 0.703           | 1.023           | 1.227           |
| Baseline - m3 | 23477           | 23477           | 23477           |
| Baseline/FFB  | 1.89            | 1.89            | 1.89            |

| Bahau Estate  | July 20-June 21 | July 21-June 22 | July 22-June 23 |
|---------------|-----------------|-----------------|-----------------|
| Water m3      | 22315           | 25009           | 23430           |
| FFB /mt       | 42713           | 43781           | 55649           |
| Water /FFB mt | 0.522           | 0.571           | 0.421           |
| Baseline - m3 | 23585           | 23585           | 23585           |
| Baseline/FFB  | 0.50            | 0.50            | 0.50            |

| Regent Estate | July 20-June 21 | July 21-June 22 | July 22-June 23 |
|---------------|-----------------|-----------------|-----------------|
| Water m3      | 101878          | 94189           | 102814          |
| FFB /mt       | 37149           | 29974           | 28617           |
| Water /FFB mt | 2.73            | 3.14            | 3.59            |



| Baseline - m3 | 99627 | 99627 | 99627 |
|---------------|-------|-------|-------|
| Baseline/FFB  | 6.49  | 6.49  | 6.49  |

| Sagil Estate  | July 20-June 21 | July 21-June 22 | July 22-June 23 |
|---------------|-----------------|-----------------|-----------------|
| Water m3      | 54900           | 73728           | 103926          |
| FFB /mt       | 24160           | 21475           | 22284           |
| Water /FFB mt | 2.27            | 3.43            | 4.66            |
| Baseline - m3 | 77518           | 77518           | 77518           |
| Baseline/FFB  | 7.30            | 7.30            | 7.30            |

.

Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.

Water sampling was taken annually to test against the industrial effluent water analysis and pesticide analysis. Bukit Dinding Estate made river water annual sampling at 7 - dated 21/02/2024 in compliance Analysis made IOI Plantation Sdn Bhd - Research Centre Gemencheh Negeri Sembilan taken 1x/year. Similarly, Bahau Estate River water at 7 points - dated 21/02/2024 in compliance Analysis made IOI Plantation Sdn Bhd - Research Centre Gemencheh Negeri Sembilan taken 1x/year. Same practices are made in Regent Estate total of 6 points (upstream, midstream and down steam of 2 natural stream A and B. Results dated 27/01/2024 was sighted and verified with parameters complying to the standard.

Drinking water made in Bukit Dinding Estate by Envichem Consults Sdn Bhd via services of ETOSH Consult & Engineering Plt based in Batu Pahat Johor recent dated 22/06/2023 and 18/12/2023 taken



2x/year. Location of samples are Assistant Bungalow, workers quarters and water treatment plant. There were no issues on the water quality for the sampling points for the sample taken. All BOD level is well below 6 ppm.

The following plan to optimize water and nutrient usage to reduce wastage has been compiled with details below.

- i. To obtain water from local authority /estate catchment in event of shortages.
- ii. To train/educate staff/workers to conserve water
- iii. To seek assistance from local authority
- iv. Collection of rain water from water harvesting
- Construction of road side pit for a better water drainage
- vi. Recycling of washing / chemical mixing water for weeding purposes.

Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.

The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing IOI policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in IOI Plantation dated Nov 2021. The buffer zones established are as follows:

River width Buffer zone River width Buffer zone

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| > 40 meters | 50 meters | 5-10 meters | 10 meters |
|-------------|-----------|-------------|-----------|
| 20 - 40 m   | 40 meters | < 5 meters  | 5 meters  |
| 10-20 m     | 20 meters | -           | -         |

The signboards were displayed accordingly at the site where applicable. The guideline was issued by the Sustainability Department with latest revision dated on 10/11/21. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:

- i. Bukit Dinding Water stream PM01H, Pond PM10A, PM10B
- ii. Bahau Water stream PM16A, PR22A
- iii. Regent Water Stream PM06C
- iv. Sagil Water stream PM20F, PM20B

Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.

During the site visit the buffer zones were well maintained as per the guidelines and SOP. Among others management plan taken by the estates are:

- i. Regular inspection at buffer/HCV areas
- ii. Monitor water from surrounding areas
- iii. Track, measure and report all activities around river
- iv. Train and educate workers.
- a) Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.

Bukit Dinding Estate had a unit of tube well located at P01H and functional. Recent reading of water level was recorded dated 21/05/2024 averaging of 32.05mm to 32.60mm every minute by a



|          |  | Consultant GWS Drilling Engineering Sdn Bhd.  |          |  |  |
|----------|--|---|----------|--|--|
| Criterio | on 3.5: A system for managing human resources is in place.   |   |          |  |  |
| 3.5.1    | Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.  - Minor Compliance - | <ul> <li>Employment procedures are documented and made available as verified as following:</li> <li>Employment procedure for workers (recruitment, selection, hiring); Date: 11/08/2020</li> <li>Retirement procedure; Dated: 21/07/2020</li> <li>Termination procedure; Dated: 11/08/2020</li> <li>Absconded foreign workers procedure; Date: 08/02/2021</li> <li>Foreign workers recruitment guideline and procedure in Malaysia Rev. July 2018</li> <li>Code of Conduct on Ethical Recruitment and Responsible Employment</li> <li>All those procedures have been included in the list of publicly available document and can be requested through the consultation and communication procedure. As per verification, there is no request from workers on that procedure.</li> </ul> | Complied |  |  |
| 3.5.2    | Employment procedures are implemented, and records are maintained Minor Compliance -   | Verification of employment documents and records confirmed that the employment procedures as described in indicator 3.5.1 above were implemented and records were maintained as described in criterion 6.1 - 6.2 below.   | Complied |  |  |
| Criterio | Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively 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.  - Critical (Major) compliance -  | Each operating centre within the UoC has adopted two key procedures aimed at managing Occupational Health and Safety (OHS) risks and identifying hazards.  (1) OHS Risk & Opportunity Management Procedure (IOI/OHSMS/PROC/07/00, Rev. No. 00, dated 01/09/2022). The   | OFI      |  |  |

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- objective of this procedure is to establish a method for identifying both management and operational OHS risks, as well as opportunities for improvement within the company. Furthermore, the procedure ensures that identified risks are quantified and that risk mitigation actions are implemented to control the risk to an acceptable level.
- (2) Hazard Identification, Risk Assessment & Risk Control (HIRARC) Procedure (IOI/OHSMS/PROC/08/00, REV. No. 00, dated 01/09/2022). This procedure provides guidance to employers regarding hazard identification, risk assessment, and determination of risk control in the workplace within the scope of the OHS Management System. It takes into account the inputs and outputs (both intended and unintended) associated with the company's current and past activities, products, and services, as well as planned or new developments, or newly modified activities, products, and services. The procedure ensures that the risk from hazards is determined by estimating the potential severity of the hazard and the likelihood of its occurrence.

#### Gomali POM:

 A total of 52 Hazard Identification, Risk Assessment & Risk Control (HIRARC) have been established, covering areas such as the Water Treatment Plant, Sterilizer Operation, Weighbridge, Loading Ramp Bay, Workshop, and Boiler Station. Significant hazards, including noise exposure, pesticides/chemicals, accidents, fire, fuel spillage, working at heights, working in enclosed spaces, hot work, lightning, electrocution, and machinery, have been identified and documented. Control measures, including the use of Personal Protective Equipment (PPE), Personal Hearing Protection (PHP), fire drill training, first aid training, and the implementation of a "Permit to Work System"



for the mill, have been put in place. The latest revision of the HIRARC for the POM was conducted on 15/04/2024, demonstrating the POM management's commitment to regular assessment and improvement of OHS measures.

• The Chemical Health Risk Assessment (CHRA) was conducted by HQ/21/ASS/00/00035, from 19/09/2023 to 21/12/2023. Report (Ref. No. HQ/21/ASS/00/00035-2023/047) dated 23/01/2024 – eleven (11) work units being identified, which are Shovel & Tractor Driver, Engine Operator, Electrical Department Personnel, Biogas Plant Operator, General Worker, Store Attendant, Water Treatment Plant Operator, Boilerman, Lab Attendant & Operator, Cleaner, and Maintenance Department Personnel. The action plan for CHRA documented as Chemical Health Risk Assessment Action Plan Gantt Chart (IOI/OHSMS/FM/CW/034/00). The plan was updated in May 2024 which also verified by the Mill Manager. Noted that the management has taken necessary actions based on the recommendations from the assessor i.e., medical surveillance, PPE usage, etc.

Medical Surveillance was conducted for 67 workers from 01/03/2024 to 18/03/2024 as per OSHA-USECHH 2000 requirements. The 67 workers were subdivided into 7 groups based on the chemical screened:

- 1. Laboratory Unit (10 workers) n-Hexane, Acetic Acid, Ammonia, Barium chloride, isopropyl alcohol, silver nitrate, sodium hydroxide & sulfuric acid
- 2. Electrical unit (7 workers) diesel, gasoline & iron oxide
- 3. Workshop unit (20 workers) manganese
- 4. Boiler & Engine Driver Units (16 workers) sodium hydroxide & sodium metabisulfite
- 5. Pump House Unit (4 workers) aluminium sulphate & calcium hypochlorite

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- 6. Biogas & Effluent Units (6 workers) hydrogen sulfide & methane
- 7. Supervisor & Store Unit (6 workers diesel, gasoline, iron oxide, sodium hydroxide, sodium metabisulfite, aluminium sulphate, calcium hypochlorite, hydrogen sulfide, methane

All 67 workers screened and passed the Medical Surveillance Programme which composed of:

- 1. History & Physical Examination
- 2. General Blood & Urine Test
- 3. Spirometry (Lung Function Test)
- 4. 2,5-Hexanedione (Laboratory Unit
- 5. Manganese (Workshop Unit)
- 6. Chest X-Ray if indicated (Workshop, Electrical, & Pump House Units)

The results of the Medical Surveillance Programme were briefed to respective workers on 16/04/2024 by the MA.

A periodic inspection, testing and examination of engineering control equipment was conducted on 04/09/2023 by HQ/18/JHII/00/00013. In conclusion, it was found that the engineering control equipment system are currently accepted and effective in its performance based on overall system measurement when compared to the American Conference of Governmental Industrial Hygienists (ACGIH) standard. The mill has implemented the recommendations in the report. This has been verified through a record entitled 'List of Checklist Local Exhaust Ventilation (LEV) System', which includes the inspection and monitoring of the hood, ducting system, and fan. The latest inspection record, dated 06/05/2024, was reviewed.



In the CHRA, in Section 7.4.1 (a), it is stated that Air Contaminant Monitoring may be discontinued for the following monitored chemical as per the table below since there are two (2) consecutive results showed that the exposure level is below 50% of the Permissible Exposure Limit (PEL):

| Discontinuation of air of | Discontinuation of air contaminant monitoring |  |  |  |
|---------------------------|---|--|--|--|
| Work unit                 | Monitored chemicals                           |  |  |  |
| Lab Attendant & Operator  | <ul><li>n-Hexane</li></ul>                    |  |  |  |
| -                         | <ul> <li>Isopropyl alcohol</li> </ul>         |  |  |  |
|                           | <ul> <li>Sodium hydroxide</li> </ul>          |  |  |  |
|                           | Sulfuric acid                                 |  |  |  |

Noise Risk Assessment (NRA) as per Occupational Safety and Health (Noise Exposure) Regulations 2019 was conducted from 22/05/2021 to 25/05/2021. The NRA was carried out by HQ/16/PEB/00/158 on a typical operational working day. The Similar Exposure Group (SEG) assessed are Press Operator, Threshing Crane Operator, Sterilizer Operator, Boiler Plant (Boilerman), Engine Room Operator, Oil Clarification Operator, Kernel Plant Operator, EFB Press Operator, Ramp Operator, Workshop Foreman, Lab Sampling Personnel, and Biogas Plant Operator. The mill management established action plan based on the assessment report and documented as Action Plan (Noise Risk Assessment Report), with latest revision was in Jan-2024. Noted that the management has taken necessary actions based on the recommendations from the assessor i.e., PHP usage, update signage with the words "HEARING PROTECTION ZONE", continue on audiometric testing programme annually, etc.



| • | A total of | 134 workers    | s were tes | sted on    | 07/07 | 7/2023   | and |
|---|------------|----------------|------------|------------|-------|----------|-----|
|   | 21/07/2023 | covering all   | shift. The | results    | were  | verified | by  |
|   | HQ/19/DOC/ | /00/00405. Sui | mmary resu | It as belo | ow:   |          |     |

| No. | Description                                 | Quantity |
|-----|---|----------|
| 1   | Total                                       | 134      |
| 2   | Baseline Audiogram                          | 42       |
| 3   | Annual Audiogram                            | 92       |
| 4   | Normal Audiometric Results                  | 65       |
| 5   | Abnormal Audiometric Results                |          |
|     | : Hearing Loss (HL)                         | 69       |
|     | : Noise Induced Hearing Loss (NIHL)         | 43       |
|     | : Hearing Impairment (HI)                   | 31       |
|     | : Temporary Standard Threshold Shift (TSTS) | 0        |
|     | : Permanent Standard Threshold Shift (PSTS) | 0        |

The results of the Audiometric Test were briefed to all workers on 18/08/2023.

Report dated 05/10/2023 stated that a total of 21 workers were examined by the OHD as per requested. The workers were identified based on the abnormal audiogram results that show NIHL and HI. Based on the examination, 2 workers identified as work-related cases. Sighted JKKP 7 and JKKP 8 reports related to these workers.

**Bukit Dinding Estate:** 



- HIRARC was assessed and documented for all estate operations which was updated on 15/04/2024, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in enclosed space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.
- Chemical Health Risk Assessment (CHRA) was conducted on 13/03/2024 by competent person with DOSH registration number HQ/22/ASS/00/00052. Report (Ref. No. HQ/22/ASS/00/00052-2024/7) shows that the assessment was conducted at the work unit of Premixer, Sprayer & Scheduled Waste Handler, Spraying, Rat Baiting & Trunk Injection Operator, Manual Manuring Operator, Manuring Operator (Spreader), Workshop Operator, Diesel Operator, Storekeeper, Water Treatment Plant Operator, and General Worker (Cleaner). The action plan for CHRA documented as Chemical Health Risk Assessment Action Plan Gantt Chart (IOI/OHSMS/FM/CW/034/00). The plan was updated in May 2024 which also verified by the Estate Manager. Noted that the management has taken necessary actions based on the recommendations from the assessor i.e., medical surveillance, PPE usage etc.
- Noise Risk Assessment (NRA) was conducted by HQ/16/PEB/00/158 dated 14/09/2020 on a typical operational working day. As per the NRA Report (Ref. No. HQ/LPROYKPEB/21/00302), the Similar Exposure Group (SEG) assessed are Workshop Foreman, Tractor Driver, Mini Excavator Driver, MMG Driver, Mist blower Sprayer, Power Wheelbarrow Operator. Additional NRA was conducted by HQ/16/PEB/00/158



dated 22/08/2022 on a typical operational working day. As per the Additional NRA Report (Ref. No. HQ/LPROYKPEB/21/00302) the Similar Exposure Group (SEG) assessed are Cantas Operator, Mechanical Buffalo (MB) Driver, Scissor Lift Driver, and Grabber Driver. The management established action plan based on both assessment reports and documented as Action Plan (Noise Risk Assessment Report), with latest revision was in Jan-2024.

In Feb-2024, an Audiometric Test was conducted by HQ/18/DOC/00/00223. Evident from the report dated 05/03/2024 that the test involved 27 workers, out of which 22 had normal hearing, 1 had Noise-Induced Hearing Loss (NIHL), and 4 had hearing impairment with NIHL. The results of the test were briefed to the respective workers on 19/03/2024 by the HA. Following the briefing, 5 affected workers were referred to the Occupational Health Doctor (OHD) on 05/04/2024. The OHD report, dated 26/04/2024, outlined an action plan for these 5 workers. The plan included continuous usage of Personal Hearing Protection (PHP), awareness training, and incident reporting to the Department of Occupational Safety and Health (JKKP). The JKKP 7 and JKKP 8 reports related to these workers were also reviewed.

#### Bahau Estate:

 HIRARC was assessed and documented for all estate operations which was updated on 15/04/2024, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in enclosed space, hot work, lightning, electrocution, machinery,



- etc. Control measures include the use of PPE, fire drill training, first aid training, etc.
- The Chemical Health Risk Assessment (CHRA) was conducted by a competent person with DOSH registration number HQ/22/ASS/00/00052 on 29/04/2023. The CHRA Report (Ref. No. HQ/22/ASS/00/00052-2023/5) shows that the work unit that has been assessed were Chemical Premix Applicator, Chemical Sprayer & Rat Baiting & Trunk Injection Applicator, P&D Sprayer & Rat Baiting & Trunk Injection Applicator, Turbomiser (P&D Treatment Machine) Operator, Geo-Spray Operator, Nursery Chemical Sprayer, Manual & Semi-Mechanise Fertilizer Applicator, Spreader Fertilizer Applicator, Nursery (Fertilizer) Applicator, Storekeeper, and Workshop Foreman. The action plan for CHRA documented as Chemical Health Risk Assessment Action Plan Gantt Chart (IOI/OHSMS/FM/CW/034/00). The plan was updated in May 2024 which also verified by the Estate Manager.
- The Noise Risk Assessment (NRA) was conducted by HQ/16/PEB/00/158 dated 15/09/2020 on a typical operational working day. As per the NRA Report (Ref. No. HQ/LPROYKPEB/20/00268), the Similar Exposure Group (SEG) assessed are Workshop Foreman, Tractor Driver, Badang/MB Driver, Mist blower Sprayer, and Knapsack Grass Cutter Operator. The Additional NRA was conducted by HQ/16/PEB/00/158 dated 09/05/2022 on a typical operational working day. As per the NRA Report (Ref. No. HQ/LPROYKPEB/22/00732), the Similar Exposure Group (SEG) assessed are Palm Mechanical Cutter Operator, and Ramp Operator. The management established action plan based on both assessment reports and documented as Action Plan (Noise Risk Assessment Report), with latest revision was in Jan-2024.



Audiometric Test was conducted twice in 2023. The first test was conducted in July 2023 by HQ/17/DOC/00/00094, with the report dated 28/09/2023. The test involved 5 workers, out of which 3 had normal hearing, 1 had non-Occupational Health and Safety (OHS) related issues, and 1 had OHS related issues. The worker with OHS related issues was reported to the Department of Occupational Safety and Health (JKKP) in October 2023. The results of the test were briefed to the respective workers in Sept 2023 by the HA. The second Audiometric Test was conducted in December 2023 by HO/17/DOC/00/00094, with the report dated 25/01/2024. This test involved 28 new workers, out of which 16 had normal hearing, 1 had non-OHS related issues, and 1 had OHS related issues. The worker with OHS related issues was reported to the JKKP in March 2024. The results of the test were also briefed to the respective workers on 19/03/2024 by the HA. The JKKP 7 and JKKP 8 reports related to the OHS related issue reported to JKKP in October 2023 were also reviewed.

#### Regent Estate:

- HIRARC was assessed and documented for all estate operations which was updated on 15/04/2024, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in enclosed space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.
- The Chemical Health Risk Assessment (CHRA) was conducted by HQ/22/ASS/00/00052 on 28/02/2022. Evident from the CHRA



Report (Ref. No. HQ/22/ASS/00/00052-2021/1) that the work unit that has been identified and assessed are Chemical Premix Operator, Field Spraying (Mist blower) Applicator, Field Spraying (Interpump) Applicator, Field Manuring & Rat Baiting Applicator, Workshop Foreman, and Sanitize Spray Applicator. The action plan for CHRA documented as Chemical Health Risk Assessment Action Plan Gantt Chart (IOI/OHSMS/FM/CW/034/00). The plan was updated in May 2024 which also verified by the Estate Manager. Noted that the management has taken necessary actions based on the recommendations from the assessor i.e., medical surveillance, PPE usage etc.

• The Noise Risk Assessment (NRA) was conducted by HQ/16/PEB/00/158 on 21/07/2020. As per the NRA Report (Ref. No. HQ/LPROYKPEB/21/00281), the Similar Exposure Group (SEG) assessed are Ramp Operator, Workshop Foreman, Tractor Driver, Mist blower Sprayer, and Knapsack Grass Cutter Operator. The Additional NRA was conducted by HQ/16/PEB/00/158 on 17/07/2023. As per the Additional NRA Report (Ref. No. ADD NRA REGENT/07/2023), the Similar Exposure Group (SEG) assessed are Motorized Cutter Operator, Power Spray Operator, and Grabber Operator. The management established action plan based on both assessment reports and documented as Action Plan (Noise Risk Assessment Report), with latest revision was in Jan-2024. Noted that the management has taken necessary actions based on the recommendations from the assessor i.e., audiometric test, PHP usage etc.

An Audiometric Test was conducted in Feb 2024 by HQ/17/DOC/00/00094, with the report dated 02/03/2024. The test involved 24 workers, out of which 21 had normal hearing, 1 had non-Occupational Health and Safety (OHS) related issues, and 2 had OHS related issues. The results of the test were briefed

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to the respective workers on 03/03/2024 by the HA. The JKKP 7 and JKKP 8 reports related to the OHS related issue reported to JKKP were also reviewed.

#### Sagil Estate:

- HIRARC was assessed and documented for all estate operations which was updated on 15/04/2024, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/ chemicals, accident, fire, fuel spillage, working at heights, working in enclosed space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc.
- The NRA was conducted by HQ/16/PEB/00/158 on 04/06/2020. As per the NRA Report (Ref. No. HQ/LPROYKPEB/20/00230), the Similar Exposure Group (SEG) assessed are Workshop Maintenance, Knapsack Grass Cutter, Mist blower Sprayer, Tractor Driver, and Pump House Operator. The Additional Noise Risk Assessment (NRA) was conducted by HQ/16/PEB/00/158 on 02/03/2022. As per the NRA Report (Ref. No. HQ/LPROYKPEB/22/00690), the Similar Exposure Group (SEG) assessed are Longstar Power Spray Driver, Motorized Cutter Operator, and Rabbit Mover Operator. The management established action plan based on both assessment reports and documented as Action Plan (Noise Risk Assessment Report), with latest revision was in Jan-2024. Noted that the management has taken necessary actions based on the recommendations from the assessor i.e., audiometric test, PHP usage etc.

An Audiometric Test was conducted in Apr 2024 by HQ/19/DOC/00/374, with the report dated 02/05/2024. The test

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involved 5 workers, which all of them having Normal Hearing results. The results of the test were briefed to the respective workers on 13/05/2024 by the HA.

An OFI has been raised against this indicator as details below:

#### (1) Location: Gomali POM

In response to one of the recommendations in the latest CHRA Report, the mill management engaged Hygiene Technician 1 to conduct air monitoring on 06/05/2024. The purpose of this was to establish the baseline exposure level and potential exposure to Manganese and Iron Oxide, which are listed in Schedule 2 of USECHH Regulations 2000.

The CHRA report specifies that the frequency of air contaminant monitoring should be determined based on the level of exposure obtained as follows:

- If the result of exposure is ≥ 8-hour TWA, monitoring frequency should be not more than once every 6 months.
- If the result of exposure is above 50% of 8-hour TWA but below 8-hour TWA, monitoring frequency should be not more than once every 12 months.

As of now, the mill management has not yet received the report on the air monitoring results conducted on 06/05/2024. Therefore, an OFI has been raised to follow up on this matter during the next audit. The specific point to verify is whether the subsequent frequency of air contaminant monitoring is not more than once every 6 months or not more than once every 12 months.

|       | T   |   |          |
|-------|---|---|----------|
|       |   | (2) Location: Sagil Estate  The Chemical Health Risk Assessment (CHRA) for Sagil Estate was conducted by HQ/22/ASS/00/00052 on 05/05/2024. The work unit that has been identified and assessed are Premix Operator, Spraying & Rat Baiting Operator (Oil Palm), Spraying Operator (Durian & Coconut), Spraying & Manuring Operator (Intercrop), Geo Spray Operator, Turbomiser Operator, MB Power Spraying Operator, Scorpion Spraying Operator, Manuring & Rat Baiting Operator, Manuring Operator, Spreader Fertilizer Operator, Manuring Operator (Nursery), Spraying Operator (Nursery), Fogging Operator, Workshop Operator, Diesel Staff Attendant, Water Pump Attendant, Water Treatment Plant Operator, Cleaner Operator, and Storekeeper.  As of now, the estate management has not yet received the full report of the assessment. Therefore, an OFI has been raised to follow up on this matter during the next audit. |          |
| 3.6.2 | (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored Critical (Major) compliance - | The respective operating centre of the Gomali POM UoC has established a comprehensive Safety & Health Management Plan for the period of Jan 2020 – Dec 2025. This plan is reviewed annually, with the most recent revision completed in May 2024 by the Manager of the Safety, Health & Environment Department and approved by the respective Estate Manager and Mill Manager. The plan consists of:  Occupational Safety and Health Policy: This policy, revised by the Plantation Director, articulates IOI's commitment to maintaining a safe and healthy working environment.  Occupational Safety and Health Committee: This committee plays a pivotal role in implementing and overseeing health and safety measures.   | Complied |

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- Emergency Response Plan: This plan ensures a swift and effective response to any emergencies that may arise.
- Occupational Safety and Health Training: Regular training sessions are conducted to educate all employees about health and safety practices.
- Accident Reporting and Investigation Procedures: These procedures facilitate the reporting and investigation of accidents to prevent future occurrences.
- Hazard Identification, Risk Assessment, and Risk Control (HIRARC): This process involves regular assessment and documentation of significant hazards, along with the implementation of control measures.
- Contractor Safety: Safety measures are extended to contractors to ensure a safe working environment for all.
- Safety House Inspection: Regular inspections are conducted to ensure the safety of workers' housing facilities.
- Performance Monitoring & Measurement: Performance in terms of health and safety is continuously monitored and measured.
- Personal Protective Equipment (PPE): The use of PPE is enforced to protect all workers from potential hazards.

Gomali Estate and Gomali POM's commitment to health and safety is further demonstrated by their ISO 45001:2018 certification, following an audit conducted from 08/05/2023 to 10/05/2023. The certificates (Gomali Estate: Certificate No. O-213/23(b), Gomali POM: Certificate No. O-213/23(a)) are valid until 20/06/2026.

Based on the documentation reviews, site visits, and interviews conducted, it has been verified that the effectiveness of the H&S plan



|         |   | in addressing health and safety risks is actively monitored by the management of the respective operating centre.   |          |
|---------|---|---|----------|
| Criteri | on 3.7: All staff, workers, Scheme Smallholders, out-growers, and   | contract workers are appropriately trained.   |          |
| 3.7.1   | (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.  - Critical (Major) compliance - | The Gomali POM UoC has established a comprehensive formal training program for the period of 2023-2024. This program, based on the identified training needs of various categories of employees and contractors, covers their related work functions and activities, RSPO requirements, Occupational Health & Safety, and Environmental matters, including gender-specific needs.  The training conducted includes refresher courses on all aspects of the RSPO P&C, productivity, and best management practices. These courses cover estate operating procedures as well as procedural matters related to Occupational Health & Safety and Environmental concerns. They range from felling of oil palms, oil palm seedlings nursery, replanting, harvesting, and upkeep of fields to evacuation of Fresh Fruit Bunches (FFB) to the mill. At the mill, the training covers processes from FFB receipt, grading, processing to Crude Palm Oil (CPO), storage, dispatch of CPO, nut kernel, and the management of by-products, wastes, and waste streams. This also includes checking and documentation for traceability of the certified FFB, CPO, and Palm Kernel (PK). The POM Manager and assistants fully understand the difference between Identity Preserved (IP) and Mass Balance (MB) modules.  In addition to the Good Mill / Agricultural Practice training, the 2023-2024 annual training program includes topics such as:  OSH Act & regulations 1994  Environmental Quality Act 1974 | Complied |
|         |   | <ul><li>Induction Program for new workers</li><li>OSH Committee and function</li></ul>  |          |

|       | <del>_</del>  | <del>,</del>   | -        |
|-------|---|--|----------|
|       |   | First Aid Training   |          |
|       |   | Scheduled waste training   |          |
|       |   | RSPO/MSPO/ISCC Principles  |          |
|       |   | High Conservation Value (HCV) & Biodiversity training  |          |
|       |   | Mechanical/electrical workshop   |          |
|       |   | Environmental responsibility   |          |
|       |   | Emergency Response drill   |          |
|       |   | Social program, including sexual harassment for male and female employees, needs of new mother, etc.   |          |
|       |   | Workers' rights, including the understanding of employment contract, calculation of wages, leave, etc.   |          |
|       |   | The understanding of the trainees was evaluated, and this was confirmed during on-site interviews with the relevant POM and estates personnel.   |          |
| 3.7.2 | Records of training are maintained Minor Compliance - | Comprehensive training records for each staff member and worker, including newly hired employees as of the audit date, were available for review in relation to the implementation of the RSPO P&C at respective operating centre of the Gomali POM UoC. | Complied |
|       |   | Each training record includes the name of the training, the date it was conducted, the name of the trainee, a list of trained employees, and a summary of the training content. The following training records were reviewed:                            |          |
|       |   | • Gomali POM: Bribery & Corruption (13/12/2024); Minimum wages (20/01/2024); Passport/Permit Renewal Process (22/12/2023); Sexual Harassment Awareness (01/08/2023); Equal Opportunity Rights (09/09/2023)   |          |

|       |   | <ul> <li>Bukit Dinding Estate: Company policies (14/05/2024); Induction<br/>for New Workers (08/05/2024); PPE Training (15/03/2024);<br/>Transporting workers to the Workplace SOP (10/05/2024);<br/>Workshop SOP (09/05/2024).</li> </ul>  |          |
|-------|---|---|----------|
|       |   | <ul> <li>Bahau Estate: Company policies (17/01/2024); Induction for New Workers (25/04/2024); Fire Drill &amp; ERP &amp; ERT Training (15/03/2024); First Aid Kit Training (09/05/2024); SOP Re-Entry (12/01/2024); SOP PPE (20/02/2024); SOP P&amp;D (11/01/2024)</li> </ul>   |          |
|       |   | <ul> <li>Regent Estate: Company policies (06/02/2024); Induction for<br/>New Workers (10/04/2024); SOP Harvesting (19/03/2024); SOP<br/>Mist blower (18/03/2024); SOP Tractor Handling (15/04/2024);<br/>Scheduled Waste Store SOP (18/03/2024)</li> </ul>  |          |
|       |   | • Sagil Estate: Company policies (07/03/2024); Induction for New Workers (08/05/2024); Manual Weeding SOP (18/04/2024); Leptospirosis Awareness (18/04/2024); Payslip Calculation (01/03/2024); Vacation Leave Pay Rights (04/03/2024); Grievance/Complaint SOP (01/03/2024)  |          |
|       |   | Overall, records of trainings conducted were properly maintained by each operating unit.  |          |
| 3.7.3 | Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. | The Gomali POM Annual Training Programme for 2024 was established in January 2024 by the Sustainability, Occupational, Safety & Health Supervisor and verified by the Mill Manager. This programme includes staged training for the RSPO SCCS.  | Complied |
|       | - Minor Compliance -  | The POM management ensures that all personnel engaged in the implementation and maintenance of the RSPO SCCS are competent, with relevant training, skills, and experience. This is attained by conducting specific training sessions, such as the Critical Control Point Training held on 22/05/2024. Additionally, training was conducted for |          |



|       |   | both Crude Palm Oil (CPO) Transporters, who are engaged by the mill management, on 06/03/2024.  During interviews, an assistant manager, weighbridge clerks, and a CPO Transporter representative confirmed their understanding of the RSPO Supply Chain, reflecting the effectiveness of the conducted training.  Records for the RSPO SCCS Trainings that have been conducted, including training attendance records, training effectiveness records, training materials, and individual training evaluation records, have been properly retained.  |                 |
|-------|---|---|-----------------|
|       |   | ever, it will not contribute to suspension if there is more than 5 non-com  | ipliance within |
| 3.8.1 | Identity Preserved Module  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.  Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable. | The supply bases for Gomali POM are comprised of the eleven (11) estates owned by IOI Corporation Berhad, i.e., Gomali Estate, Paya Lang Estate, Tambang Estate, Sagil Estate, Regent Estate, Bahau Estate, Kuala Jelei Estate, Bertam Estate, Jasin Lalang Estate, Bukit Dinding Estate, and Bukit Serampang Estate. All these estates are under Gomali POM Unit of Certification with Certificate No. RSPO 727112.  For the period of May 2023 – Apr 2024, Segamat Estate, Pukin Estate, Shahzan IOI 1 Estate, Shahzan IOI 2 Estate, and Leepang A Estate also supplied their FFBs to Gomali POM. These five (5) estates are owned by IOI Corporation Berhad which under Pukin POM Unit of Certification. Desktop study shows that Pukin POM Unit of Certification is RSPO-certified with Certificate No. RSPO 927888 (valid until 12/06/2026). | Complied        |
|       |   | On-site verification conducted during the assessment confirmed that there are no outgrowers, independent suppliers, or smallholders   |                 |

|       |  | involved in the supply of Fresh Fruit Bunches (FFB) to the palm oil mill.  Therefore, the Gomali POM continues to apply the Identity Preserved (IP) module.  |                   |
|-------|--|--|-------------------|
| 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. | The supply bases for Gomali POM are comprised of the eleven (11) estates owned by IOI Corporation Berhad, i.e., Gomali Estate, Paya Lang Estate, Tambang Estate, Sagil Estate, Regent Estate, Bahau Estate, Kuala Jelei Estate, Bertam Estate, Jasin Lalang Estate, Bukit Dinding Estate, and Bukit Serampang Estate. All these estates are under Gomali POM Unit of Certification with Certificate No. RSPO 727112.  For the period of May 2023 – Apr 2024, Segamat Estate, Pukin Estate, Shahzan IOI 1 Estate, Shahzan IOI 2 Estate, and Leepang A Estate also supplied their FFBs to Gomali POM. These five (5) estates are owned by IOI Corporation Berhad which under Pukin POM Unit of Certification. Desktop study shows that Pukin POM Unit of Certification is RSPO-certified with Certificate No. RSPO 927888 (valid until 12/06/2026).  On-site verification conducted during the assessment confirmed that there are no outgrowers, independent suppliers, or smallholders involved in the supply of Fresh Fruit Bunches (FFB) to the palm oil mill.  Since the Gomali POM continues to apply the Identity Preserved (IP) module, therefore, this indicator is not applicable. | Not<br>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                              | The estimated tonnage of CPO and PK products that could potentially be produced by the POM is recorded and submitted by the POM. The data is verified during the current audit.  | Complied          |



|       | then be recorded in each subsequent annual surveillance report.   | This figure represents the total volume of RSPO-certified palm oil products (CPO and PK) that the RSPO-certified POM is allowed to deliver in a year.  The actual tonnage produced has been recorded in each annual audit report.  |          |
|-------|---|--|----------|
|       |   | See also Table 10. Summary of Certified Tonnage (MT)   |          |
| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.   | The POM meets all registration and reporting requirements for the appropriate supply chain through the RSPO Supply Chain managing organization (RSPO IT platform or book and claim).   | Complied |
|       |   | Marketing Department will make the necessary transaction of RSPO certified CPO and PK in the RSPO IT Platform. During the audit, verified that all the transactions from the mill (CSPO/CSPK) were announce accordingly.   |          |
|       |   | IOI Corporation Berhad held RSPO membership number: 2-0002-04-000-00   |          |
|       |   | The POM has registered in RSPO PalmTrace as follows:   |          |
|       |   | License ID: CB150749 (Active)  |          |
|       |   | Member Name: Dynamic Plantations Bhd - Gomali Palm Oil Mill  |          |
|       |   | Member ID: RSPO_PO100000094  |          |
|       |   | Type of Business: Oil mill   |          |
| 3.8.5 | Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: | The Standard Operating Procedure (SOP) for the implementation of supply chain system for Gomali POM is documented as RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP) (RSPOSC/SOP/IP/3, Rev. No. 11, dated 01/11/2023). This SOP encompasses a range of aspects, including responsibilities, reception of raw materials, processing, and storage of certified and non-certified Fresh Fruit Bunches (FFBs), mill dispatch procedures, record-keeping and | Complied |

...making excellence a habit."

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- a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.
- b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).
- c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.
- d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.

retention, training, claims, overproduction, handling complaints, and addressing non-conforming products.

Gomali POM has diligently maintained up-to-date records in accordance with the requirements of RSPO P&C 2018 (MY-NI 2019) under Supply Chain Requirements for Mills. During the audit, sampled records were reviewed, focusing on Indicator 3.8.7, 3.8.8, and 3.8.12, to ensure compliance.

Under the "Training" (Section 8) of the SOP that all relevant personnel shall be given training on the RSPO supply chain system and its implementation at least once a year. Records of the RSPO SCCS training were available and evident during the audit. The management conducted various training sessions related to the supply chain for all personnel involved in the implementation and maintenance of the RSPO SCCS, including contractors. Interviews conducted with the weighbridge operator confirmed her understanding of the palm oil mill's supply chain processes.

Under the "Responsibilities" (Section 3) of the SOP, it is explicitly stated that the Mill Manager holds overall responsibility and authority for the implementation of the procedure, compliance with requirements, and adherence to all applicable supply chain standards. The SOP also allows for the assignment of specific duties and responsibilities to employees for the implementation of the supply chain system. Furthermore, the management has established an RSPO SCCS Management System Committee, updated on 13/01/2024, to ensure the effective implementation of the Supply Chain Certification Standard (SCCS). The appointment letters issued by the Mill Manager to the Mill Assistant Manager dated 01/11/2023 clearly define her roles and responsibilities as the Supply Chain Officer

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|       |  | for Gomali POM. Through interviews with the Mill Manager and the Supply Chain Officer, their awareness and understanding of the established procedure were demonstrated.   |          |
|-------|--|--|----------|
| 3.8.6 | 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. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. | The Standard Operating Procedure (SOP) for Internal Audit (RSPOSC/SOP/IA/1, Rev: 03, dated 31/07/2023) clearly outlines the requirement for conducting internal audits related to the RSPO Supply Chain Certification Standard's requirements and the RSPO Rules on Market Communications & Claims.  On 19/04/2024, the internal audit was conducted by two (2) internal auditors from the Sustainability Department – Peninsular Region. From the documentation review and interview conducted, it is verified that the mill has ensured objectivity and impartiality of the audit process by assigned the internal auditors that independent of the work they audited. The audit resulted in one (1) non-conformity identified (which was closed adequately by the mill management). The mill maintains proper records and reports of the internal audit.  During the Management Review Meeting, as evidenced by the minutes, the input from the internal audit findings was discussed to assess the effectiveness of implementing the RSPO SCCS requirements. It was verified that the internal audit was effectively implemented and maintained at the Gomali POM.  The Management Review Meeting took place on 02/05/2024, chaired by the Plantation Controller, and attended by key personnel responsible for RSPO SCCS implementation, including Mill Manager, Assistant Mill Managers, Sustainability In-Charge, etc. The meeting covered various topics such as the Result of the Internal Audit, Performance Review of the Mill and Estates, Customer Feedback, Continuous Improvement Aspects of the Mill and Estates, Resource | Complied |

...making excellence a habit."

|       |   | Needs and Training, Discussion on Previous Management Review Meeting Issues, Roundtable Assessment of Additional Issues, Discussion on the Action Plan, and Other Matters. Among the issues highlighted during the meeting is the implementation of the RSPO Rules on Market Communications and Claims (approved by the Board of Governors 3 October 2022) which brings to the SOP: RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP) (RSPOSC/SOP/IP/3, Rev. No. 11, dated 01-Nov-2023). Respective personnel were noted for follow-up actions as required. The minutes of the meeting were available for verification. Overall, the Management Review Meeting was found to be effectively implemented and maintained at Gomali POM. |          |
|-------|---|---|----------|
| 3.8.7 | <ul> <li>Purchasing and Goods In</li> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul> | The supply bases for Gomali POM are comprised of the eleven (11) estates owned by IOI Corporation Berhad, i.e., Gomali Estate, Paya Lang Estate, Tambang Estate, Sagil Estate, Regent Estate, Bahau Estate, Kuala Jelei Estate, Bertam Estate, Jasin Lalang Estate, Bukit Dinding Estate, and Bukit Serampang Estate. All these estates are under Gomali POM Unit of Certification with Certificate No. RSPO 727112.  | Complied |
|       |   | On-site verification conducted during the assessment confirmed that there are no outgrowers, independent suppliers, or smallholders involved in the supply of Fresh Fruit Bunches (FFB) to the palm oil mill.   |          |
|       |   | The Daily Production Report showed traceable figures of certified products from certified raw material sources. All incoming certified raw material is recorded on a daily, monthly, and annual basis.  Incoming raw material indicating name and address of the product origin, name, and address of the receiver; ticket number, delivery   |          |

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order no.; contract no.; date; quantity; transporter; type of product; and RSPO certificate number.

The documented procedure above specified the mechanism to notify CB in case of any projected overproduction of certified tonnage. Verification on-site confirmed that the relevant person-in-charge of supply chain aware of this procedure.

When FFB delivered to the mill from the estates, the transporters presented Delivery Note (DN) to the mill weighbridge clerk in order the FFB to be received by the mill. e.g., of information available in the DN. Sampled as follows:

- (1) Gomali Estate: D/N No. 1062525, dated 30/04/2024; Estate W/B Ticket No. -, dated -; Mill W/B Ticket No. FB 24004465, dated 30/04/2024; Net weight 10,710 kg
- (2) Paya Lang Estate: D/N No. 1064755, dated 29/04/2024; Estate W/B Ticket No. -, dated -; Mill W/B Ticket No. FB 24004433, dated 29/04/2024; Net weight 5,680 kg
- (3) Tambang Estate: D/N No. 1038189, dated 29/04/2024; Estate W/B Ticket No. -, dated -; Mill W/B Ticket No. FB 24004444, dated 29/04/2024; Net weight 10,250 kg
- (4) Sagil Estate: D/N No. 1030844, dated 29/04/2024; Estate W/B Ticket No. 1202, dated 29/04/2024; Mill W/B Ticket No. FB 24004443, dated 29/04/2024; Net weight 32,960 kg
- (5) Regent Estate: D/N No. 1050849, dated 29/04/2024; Estate W/B Ticket No. 3771, dated 29/04/2024; Mill W/B Ticket No. FB 24004432, dated 29/04/2024; Net weight 26,330 kg
- (6) Bahau Estate: D/N No. 1063866, dated 29/04/2024; Estate W/B Ticket No. D0018168, dated 29/04/2024; Mill W/B Ticket No. FB 24004424, dated 29/04/2024; Net weight 23,680 kg

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- (7) Kuala Jelei Estate: D/N No. 1037398, dated 29/04/2024; Estate W/B Ticket No. -, dated -; Mill W/B Ticket No. FB 24004455, dated 29/04/2024; Net weight 20,240 kg
- (8) Bertam Estate: D/N No. 950282, dated 18/04/2024; Estate W/B Ticket No. 433, dated 18/04/2024; Mill W/B Ticket No. FB 24004001, dated 18/04/2024; Net weight 32,470 kg
- (9) Jasin Lalang Estate: D/N No. 1033333, dated 26/04/2024; Estate W/B Ticket No. 72282, dated 26/04/2024; Mill W/B Ticket No. FB 24004343, dated 26/04/2024; Net weight 32,810 kg
- (10) Bukit Dinding Estate: D/N No. 1039078, dated 29/04/2024; Estate W/B Ticket No. 00004618, dated 29/04/2024; Mill W/B Ticket No. FB 24004445, dated 29/04/2024; Net weight 32,900 kg
- (11) Bukit Serampang Estate: D/N No. 1049146, dated 30/04/2024; Estate W/B Ticket No. 1094, dated 30/04/2024; Mill W/B Ticket No. FB 24004488, dated 30/04/2024; Net weight 16,420 kg

For the period of May 2023 – Apr 2024, Segamat Estate, Pukin Estate, Shahzan IOI 1 Estate, Shahzan IOI 2 Estate, and Leepang A Estate also supplied their FFBs to Gomali POM. These five (5) estates are owned by IOI Corporation Berhad which under Pukin POM Unit of Certification. Desktop study shows that Pukin POM Unit of Certification is RSPO-certified with Certificate No. RSPO 927888 (valid until 12/06/2026). Sampled as below:

(1) Pukin Estate: D/N No. A 102087, dated 29/02/2024; Estate W/B Ticket No. TB124000009, dated 29/02/2024; Mill W/B Ticket No. FB 24002068, dated 29/02/2024; Net weight 25,890 kg

|       |   | <ol> <li>(2) Shahzan IOI 1 Estate: D/N No. 1025652, dated 29/02/2024; Estate W/B Ticket No. 4752, dated 29/02/2024; Mill W/B Ticket No. FB 24002032, dated 29/02/2024; Net weight 12,850 kg</li> <li>(3) Shahzan IOI 2 Estate: D/N No. 1060281, dated 29/02/2024; Estate W/B Ticket No. 4756, dated 29/02/2024; Mill W/B Ticket No. FB 24002042, dated 29/02/2024; Net weight 12,090 kg</li> <li>(4) Segamat Estate: D/N No. 1023005, dated 29/02/2024; Estate W/B Ticket No. 2400, dated 29/02/2024; Mill W/B Ticket No. FB 24002035, dated 29/02/2024; Net weight 34,490 kg</li> </ol>   |          |
|-------|---|--|----------|
|       |   | Upon reviewing the latest Monthly Production Report and RSPO PalmTrace, it has been confirmed that there is no projected overproduction of certified tonnage. Therefore, there is no need for the mill to immediately inform BSI about a projected overproduction of certified tonnage.  |          |
|       |   | The mechanism on handling of non-conforming FFB and/or documents are addressed under Clause 12 – Non-conformities Products in the RSPO Supply Chain – Module D – CPO Mills: Identity Preserved (IP), (RSPOSC /SOP/IP/3, Rev. 07, dated 21 Sept 2020). Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall keep separately from certified oil palm products via segregation at mill ramp (for FFB), or segregation at the mill's storage tank station (for CPO and PK). However, no nonconforming oil palm products received by the mill since last audit. |          |
| 3.8.8 | Sales and Goods Out 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 | Gomali POM is entitled to sell CPO, and PK as RSPO certified using IP Module. Upon reviewing the transaction records from May 2023 to April 2024, it has been confirmed that the RSPO certified volumes were not sold under any other scheme or as conventional products. They were exclusively sold as RSPO-certified products. Verified that   | Complied |



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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):

- a) The name and address of the buyer;
- b) The name and address of the seller;
- c) The loading or shipment / delivery date;
- d) The date on which the documents were issued;
- e) RSPO certificate number;
- f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);
- g) The quantity of the products delivered;
- h) Any related transport documentation;
- i) A unique identification number.

the mill ensured the required information is available in document form. Sample the sales and goods out documented information as below:

#### **CSPO**

- a) The name and address of the buyer: IOI Commodity Trading Sdn Bhd, Putrajaya, Malaysia
- b) The name and address of the seller: Gomali POM, Johor, Malaysia
- c) The loading or shipment / delivery date: 16/04/2024
- d) The date on which the documents were issued:16/04/2024
- e) RSPO certificate number: RSPO 727112 (valid until 22/08/2025)
- f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPO/IP
- g) The quantity of the products delivered: 44,360 KG
- h) Any related transport documentation: CPO Despatch Chit (No. 69119), Mill's W/B Ticket (No. CP24000386), MPOB L3 Form (No. H015258); Collection Order (No. 92160)
- i) A unique identification number: RSPO PalmTrace (ID No. TR-51c4087d-85f1; announced on 08/05/2024, confirmed on 13/05/2024 verified that the announcement performed not more than three months after dispatch)

#### **CSPK**

- a) The name and address of the buyer: IOI Commodity Trading Sdn Bhd, Putrajaya, Malaysia
- b) The name and address of the seller: Gomali POM, Johor, Malaysia
- c) The loading or shipment / delivery date: 19/04/2024
- d) The date on which the documents were issued:19/04/2024

|       |   | e) RSPO certificate number: RSPO 727112 (valid until 22/08/2025)  |          |
|-------|---|---|----------|
|       |   | f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPK/IP  |          |
|       |   | g) The quantity of the products delivered: 43,700 KG  |          |
|       |   | h) Any related transport documentation: PK Despatch Chit (No. 69154), Mill's W/B Ticket (No. PK24000081), Collection Order (No. 63261)  |          |
|       |   | i) A unique identification number: RSPO PalmTrace (ID No. TR-7c13ae66-7e0f; announced on 16/05/2024, confirmed on 16/05/2024 – verified that the announcement performed not more than three months after dispatch)  |          |
| 3.8.9 | Outsourcing Activities  i) The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third  | No outsourced activities were identified at the Gomali POM, except for the engagement of external transporters for the transportation of CPO. The contracted transporters are as follows:   | Complied |
|       | 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   | Sasaran Perentas Sdn Bhd     The transporter will provide the company with the said services for the period commencing from 01/09/2021 to 30/06/2024.   |          |
|       | relevant requirements of this RSPO Supply Chain Certification  ii) The mill shall ensure the following:   | Teo Tuan Kwee Sdn Bhd     The transporter will provide the company with the said services for the period commencing from 01/09/2021 to 30/06/2024.  |          |
|       | <ul> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> </ul> | The agreement includes an appendix titled "Additional Requirements for Contractors and Service Providers" (Rev. No. 04, dated 04/02/2024). This appendix includes a clause that reserves the certification body's right to audit the outsourced contractor and outlines the procedures for the outsourced activities shared with the relevant contractor. |          |

|        | 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. | procedures for the outsourced process. This control system and the associated procedures were communicated to the appointed contractor through a briefing session conducted by the mill management at the time of contract signing. Training related to the control system and the associated procedures was conducted on   |          |
|--------|---|---|----------|
| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.  | The list of contracted parties is maintained by the POM in its established stakeholders list, updated on 01/04/2024. The list contains name of contractors, designated contact persons, contact details (address, phone number, etc.), and type of contracted works done.   | 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.   | Based on the review of documentation and the interview conducted with the Mill Manager, it has been verified that the audited POM has not engaged any new contractors for the physical handling of RSPO certified oil palm products since the last audit. Consequently, there was no requirement for the mill to provide advance notice to BSI regarding the engagement of new contractors prior to this audit. | Complied |
| 3.8.12 | Record keeping  | Gomali POM has diligently maintained up-to-date records in accordance with the RSPO P&C (MY-NI 2019) requirements for Supply  | Complied |



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- 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.

Chain Requirements for Mills. Samples of these records were reviewed, specifically referencing 3.8.7, 3.8.8, and 3.8.12.

The mill adheres to a minimum record retention period of 2 years, as outlined in the SOP: RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP) (RSPOSC/ SOP/IP/3, Rev. No. 11, dated 01/11/2023). Furthermore, accounting-related records, such as contracts and invoices, are retained for a minimum of seven years, in compliance with the Annual Accounting report and Stock Inventory requirements. It has been verified that all retained records and reports are in line with relevant legal and regulatory obligations, and they confirm the certified status of raw materials or products in stock.

Gomali POM solely processes FFB from its supply base and sister estates owned by its parent company i.e., IOI Corporation Berhad, and no FFB is sourced from out-growers, independent suppliers, or smallholders. The estimated volume provided by the UoC is included in the Public Summary Report. Traceability has been verified through Production Reports spanning the past 12 months, relying on related records such as FFB Delivery Notes, W/B Tickets, FFB & Truck Daily Summaries, Production Reports, CPO & PK Storage Reports, and CPO & PK Delivery Orders.

Transaction documents and bookkeeping for CPO and PK are performed on a daily basis, and monthly summary reports detailing FFB receipts, FFB processed, CPO production, PK production, and stock balances are submitted to the Regional Office and Head Office. The three (3) weighbridges at the mill are properly calibrated, with calibration certificates found to be in order. As per the SOP, records are archived and retained for a minimum of 7 years.

The mill meticulously keeps records and reconciles all receipts of received FFB and deliveries of RSPO-certified CPO and PK in real-time. These records are housed in the weighbridge office. The material and

|        |  | products movement on real-time basis is recorded in "Monthly Production Report" for both CPO and PK. The data is summarised in "CPO/PK Mass Balance Calculation (Internal Process & Output for Financial Year 2023/2024". Among the information available in the format is date, FFB processed, OER, CPO amount (opening, produced and closing) and transferred CPO (mill weight, refinery weight).   |          |
|--------|--|---|----------|
| 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 extraction rates based upon past experience, documented and applied it consistently. | The estimated tonnage of CPO and PK for the period from (Aug 2023 – July 2024) has been verified and reported in this public summary report (Table 10). This estimate is based on the FFB received and processed by the mill within a 12-month period. The figures provide an indication of the mill's performance and the quality of the FFB over the last 12 months.  Additionally, the deduction and conversion ratios for the volumes of                                    | Complied |
|        |  | CPO and PK delivered from the POM have been accurately calculated and recorded. These ratios are important for determining the yield and efficiency of the processing operations, ensuring that the appropriate amounts of CPO and PK are derived from the FFB. The previous actual OER & KER is also reported in Table 10 of this report.  |          |
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.   | During the interview with the Mill Manager, it was confirmed that the mill follows a practice of announcing the percentage of Oil Extraction Rate (OER) and Kernel Extraction Rate (KER) on a daily basis, provided that processing operations are carried out that day. These announcements are typically made in the morning.   | Complied |
|        |  | Furthermore, on a monthly basis, the mill communicates the average rates for OER and KER to the relevant stakeholders (top management and estate management). This information is shared with parties involved in the supply chain or other relevant parties. The summary report prepared by the Mill Manager provides an overview of these average rates for OER and KER, allowing for monitoring and analysis of the mill's performance over time. Sighted the summary report |          |



|        |  |  | for the month of Apri<br>nt. The OER & KER in  | 2024, which maintained by the report as below:  |          |
|--------|--|--|--|---|----------|
|        |  |  | This Month   | To date   |          |
|        |  |  | (April 2023)   | (Jul 2023 – Apr 2024)   |          |
|        |  | OER (%)  | 21.03  | 22.04   |          |
|        |  | KER (%)  | 4.03   | 4.24  |          |
| 3.8.15 | Processing   | The cumply baces f   | For Compli DOM pro o   | omprised of the claver (11)   | 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 noncertified oil palm products, including during transport and storage to strive for 100% separation. | estates owned by<br>Lang Estate, Tamb<br>Estate, Kuala Jelei<br>Dinding Estate, an     | IOI Corporation Berha<br>pang Estate, Sagil Es<br>Estate, Bertam Estate<br>d Bukit Serampang E | omprised of the eleven (11) ad, i.e., Gomali Estate, Paya state, Regent Estate, Bahau e, Jasin Lalang Estate, Bukit Estate. All these estates are in with Certificate No. RSPO          | Complied |
|        |  | Shahzan IOI 1 Esta<br>also supplied their<br>owned by IOI Cor<br>Certification. Deskto | ate, Shahzan IOI 2 Es<br>FFBs to Gomali POM<br>poration Berhad whic<br>op study shows that Po  | egamat Estate, Pukin Estate,<br>state, and Leepang A Estate<br>. These five (5) estates are<br>th under Pukin POM Unit of<br>ukin POM Unit of Certification<br>RSPO 927888 (valid until |          |
|        |  | there are no outo  | growers, independent   | e assessment confirmed that<br>suppliers, or smallholders<br>inches (FFB) to the palm oil   |          |
|        |  | Therefore, the Gom (IP) module.  | nali POM continues to  | apply the Identity Preserved  |          |



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#### 3.8.16 Registration of Transactions

- 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.

IOI Corporation Berhad held RSPO membership number: 2-0002-04-000-00

The POM has registered in RSPO PalmTrace as follows:

- License ID: CB150749 (Active)
- Member Name: Dynamic Plantations Bhd Gomali Palm Oil Mill
- Member ID: RSPO PO1000000094
- Type of Business: Oil mill

Marketing Department will make the necessary transaction of RSPO certified CPO and PK in the RSPO IT Platform. During the audit, verified that all the transactions from the mill (CSPO/CSPK) were announce accordingly.

The POM meets all registration and reporting requirements for the appropriate supply chain through the RSPO Supply Chain managing organization (RSPO IT platform or book and claim).

The volume for RSPO certified products is monitored through the Continuous Account System and Palm Trace transaction. Records for the transactions made from the POM as sold to the next owner. During audit conducted, verified that all the transactions from the mill (CSPO/CSPK) were announce accordingly. Sighted Shipping Announcement as below:

- (1) RSPO PalmTrace ID No. TR-51c4087d-85f1; announced on 08/05/2024, confirmed on 13/05/2024 verified that the announcement performed not more than three months after dispatch.
- (2) RSPO PalmTrace ID No. TR-7c13ae66-7e0f; announced on 16/05/2024, confirmed on 16/05/2024 verified that the announcement performed not more than three months after dispatch.

Complied

|        |   | <ul> <li>(3) RSPO PalmTrace ID No. TR-e744574d-ad76; announced on 09/05/2024, confirmed on 09/05/2024 – verified that the announcement performed not more than three months after dispatch.</li> <li>Upon reviewing the transaction records from May 2023 to April 2024, it has been confirmed that the RSPO certified volumes were not sold under any other scheme or as conventional products. They were exclusively sold as RSPO-certified products. As a result, the mill does not require the execution of the 'Remove' option in the RSPO PalmTrace system.</li> </ul> |          |
|--------|---|--|----------|
| 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. | Based on SOP: RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP) (RSPOSC/ SOP/IP/3, Rev. No. 11, dated 01/11/2023, under "Claims" (Section 9), stated that claims shall only be made according to the RSPO Rules for Communication & Claims. The rules set out are supplementary to the RSPO SCCS and are broken down into three (3) code areas of communication:  General Corporate Communication  Business to Business Communication  Business to Consumer Communication   | Complied |
|        |   | The company has secured a Trademark License from RSPO – License No. 2-0002-04-100-03 (valid until 10/01/2026). The verification included an examination of notice boards, business cards, shipping documentation, procurement/purchasing documents, promotional materials, and other relevant sources. Importantly, this corporate communication exclusively pertains to 'off-pack claims", emphasizing the company's dedication to adhering to RSPO principles throughout its operations.   |          |

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|        |  | During the assessment, there was no evidence found of any incorrect or inappropriate claims being made at Gomali POM. It was verified that relevant information regarding product claims, such as the applicable Supply Chain model and certificate number, is correctly indicated in the relevant outgoing paperwork. Additionally, it was confirmed that the mill does not use the RSPO corporate logo or trademark logo inappropriately.   |          |
|--------|--|---|----------|
| Genera | l 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.   | Gomali POM has not made any off-product claims, a fact verified through document and site reviews, including examinations of the notice board, business cards, shipping documentation, procurement/purchasing documents, and promotional materials, among others  IOI Corporation Berhad has obtained the RSPO Trademark License with the License Number: 2-0002-04-100-03 dated 17/01/2024 with updated date on 29/01/2024, the license is valid until 10/01/2026. Term and Condition is as per RSPO Rules On Market Communication & Claims. | 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 | On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards.  | Complied |
| 4.3    | Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.  | Based on site visit and documentation review, verified that RSPO corporate logo is not use by the UoC.  | Complied |

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| 4.4 | In corporate communications, RSPO members must not make<br>any statement that may lead consumers to believe that RSPO<br>membership by itself implies the selling of RSPO certified palm<br>oil products.  | Gomali Palm Oil Mill does not make any statement that may lead to believe that RSPO memberships by itself implies the selling of RSPO certified oil palm product.   | 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 (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." | On the parent company's website, it is explicitly mentioned that they are a member of RSPO and are dedicated to adopting RSPO standards.  Not applicable as no off-product claim made by the mill as to date. | Not<br>Applicable |
| 4.6 | 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  | Gomali Palm Oil Mill is a RSPO certified unit and IOI Plantations is a certified member. Therefore, this indicator is not applicable.   | Not<br>Applicable |

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|        | 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". |   |                   |
|--------|---|---|-------------------|
| Produc | t-specific communications   |   |                   |
| 5.1 Ge | neral   |   |                   |
| 5.1.1  | Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.  | Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |
| 5.1.2  | Product-specific communications are voluntary.  | No Product-specific communications are being made by the UoC.   | Not<br>Applicable |
|        |   | Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. |                   |

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| 5.1.3 | Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.   | No RSPO Label used.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP                            | Not<br>Applicable |
|-------|--|--|-------------------|
| 5.1.4 | Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.   | No other trademark or label use to highlight.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |
| 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 | No on products claims made.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.                   | Not<br>Applicable |
|       | Platform and complete the information under 'description of products' field.  • Both parties shall inform their certification body in writing about the agreement.  • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer.   |  |                   |
| 5.1.6 | Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO   | Only produce CPO and PK, no further modify end products.   | Not<br>Applicable |

Complied



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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

Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.

#### 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.

Product specific communications made off pack such as shipping documents. Sighted shipping documents of below transaction:

#### Crude Palm Oil

- The name and address of the buyer: IOI Pan-Century Edible Oils
- The name and address of the seller: Gomali Palm Oil Mill
- The loading or shipment / delivery date: 29/03/2024
- The date on which the documents were issued: 29/03/2024
- RSPO certificate number: RSPO-727112
- A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Identity Preserve
- The quantity of the products delivered: 40.1 MT of RSPO/IP CSCPO.
- Any related transport documentation: Delivery Note (91778)

#### Palm Kernel

• The name and address of the buyer: Jin Lee (Oil Mills) Sdn Bhd

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|       |   | The ways and address of the callest Consult Dalas C'I M''   |          |
|-------|---|---|----------|
|       |   | The name and address of the seller: Gomali Palm Oil Mill  |          |
|       |   | The loading or shipment / delivery date: 29/05/2024   |          |
|       |   | The date on which the documents were issued: 29/05/2024   |          |
|       |   | RSPO certificate number: RSPO-727112  |          |
|       |   | <ul> <li>A description of the product, including the applicable supply chain<br/>model (Identity Preserved or Mass Balance or the approved<br/>abbreviations): Identity Preserve</li> </ul> |          |
|       |   | The quantity of the products delivered: 43.16 MT of RSPO/IP CSPK.   |          |
|       |   | <ul> <li>Any related transport documentation: Collection Order (JL002530)</li> </ul>  |          |
|       |   |   |          |
|       |   | There was no logo being used in the shipping documents.   |          |
| 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 | Product specific communications made off pack such as shipping documents. Sighted shipping documents of below transaction:  | Complied |
|       | number under which the claim is being made.   | Crude Palm Oil  |          |
|       |   | The name and address of the buyer: IOI Pan-Century Edible Oils  |          |
|       |   | The name and address of the seller: Gomali Palm Oil Mill  |          |
|       |   | The loading or shipment / delivery date: 29/03/2024   |          |
|       |   | The date on which the documents were issued: 29/03/2024   |          |
|       |   | RSPO certificate number: RSPO-727112  |          |
|       |   | <ul> <li>A description of the product, including the applicable supply chain<br/>model (Identity Preserved or Mass Balance or the approved<br/>abbreviations): Identity Preserve</li> </ul> |          |
|       |   | The quantity of the products delivered: 40.1 MT of RSPO/IP CSCPO.   |          |

|       |  | Any related transport documentation: Delivery Note (91778)  |                   |
|-------|--|---|-------------------|
|       |  |   |                   |
|       |  | Palm Kernel   |                   |
|       |  | The name and address of the buyer: Jin Lee (Oil Mills) Sdn Bhd  |                   |
|       |  | The name and address of the seller: Gomali Palm Oil Mill  |                   |
|       |  | The loading or shipment / delivery date: 29/05/2024   |                   |
|       |  | The date on which the documents were issued: 29/05/2024   |                   |
|       |  | RSPO certificate number: RSPO-727112  |                   |
|       |  | A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Identity Preserve |                   |
|       |  | The quantity of the products delivered: 43.16 MT of RSPO/IP CSPK.   |                   |
|       |  | Any related transport documentation: Collection Order (JL002530)  |                   |
| 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:  | Not distributor or wholesaler. Therefore, it is not applicable.   | Not<br>Applicable |
|       | • 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.  |   |                   |

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|        | • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.   |   |                   |
|--------|--|---|-------------------|
| 5.3 On | pack claims  |   |                   |
| 5.3.1  | Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D. | No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |
| 5.3.2  | In case of limited space, RSPO allows flexibility to use a one-<br>line arrangement claim together with a valid trademark licence<br>number for on pack communications as below without having<br>to use any RSPO Label. The licence number has to measure at<br>least 4pt (1.4mm) in size and the font must be Calibri. The<br>following options shall be considered:   | No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |
|        | 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.  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.  | No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |

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|       | C) For Partially Certified Products:  • RSPO 50% MIXED*  • Contains at least 50% RSPO certified palm oil*  *Add RSPO TM Licence Number below or next to the claim.  | No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |
|-------|---|---|-------------------|
|       | 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. | No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |
| 5.3.3 | On pack claims shall not include information about the claimant's RSPO membership status.   | No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |
| 5.3.4 | Members shall not communicate to consumers information about their suppliers' RSPO membership status.   | No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP. | Not<br>Applicable |
| 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.  | No on-pack claims.  | Not<br>Applicable |



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|        |  | Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.  |                   |
|--------|--|--|-------------------|
| 5.3.6  | All members making on pack claims are encouraged to submit<br>the information and images of their end products that carry the<br>RSPO Label via the MyRSPO portal.   | No on-pack claims.  Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.  | Not<br>Applicable |
| MODUL  | E A – IDENTITY PRESERVED (Delete Non Applicable Module)  |  |                   |
|        | 95% of the palm oil content must be RSPO IP certified.   | Gomali POM produce 100% palm oil product, raw material as FFB and output as CPO and PK. The product when claimed as RSPO material is under 100%  CPO and PK content is 100% Oil Palm and claimed as either RSPO IPcertified or conventional.   | 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 company is using IP module with all incoming and outgoing claim were made under IP supply chain model.  CPO and PK content is 100% Oil Palm and claimed as either RSPO IP-certified or conventional. The is no percentage of non-certified volume as volume sold is same with IP-certified produced. | Complied          |
| Messag | ing  |  |                   |
|        | Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:   | There are no messaging involved since Gomali Palm Oil Mill is producing crude palm product and does not involved in any labelling of end products  | Complied          |

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|          | <ul> <li>The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org</li> <li>By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org</li> <li>RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain.www.rspo.org</li> <li>Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org</li> <li>The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org</li> <li>RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria.</li> </ul> |  |                   |
|----------|--|--|-------------------|
| Droduc   | www.rspo.org   |  |                   |
|          | 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".  | There are no product specific communication and labelling being practise as the mill is using the tanker and lorry to transport the CPO and PK. Hence there is no Product-Specific Communications Labelling being practice by the UoC. Hence, this requirement is not applicable.  | Not<br>Applicable |
| Princip  | le 4: Respect community and human rights and deliver be  | enefits  |                   |
| Criterio | on 4.1: The unit of Certification respects human rights, which incl  | udes respecting the rights of Human Rights Defenders.  |                   |
| 4.1.1    | <b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.  - Critical (Major) compliance -   | All operating units within Gomali Grouping adopted IOI Group Sustainable Palm Oil Policy that includes respect of human rights and prohibition of retaliation against human rights defenders. The policy publicly communicated via company's website link as following:  Sustainable Palm Oil Policy.pdf (ioigroup.com)  The policy also communicated from time to time to all employees during daily morning muster rollcall as per samples as following: | Complied          |

|                          |  | - Rukit Dind                                       | ing Estate; Da  | ato: 14/05/                        | 2024  |   |                |
|--------------------------|--|--|---|------------------------------------|---|---|----------------|
|                          |  |  | ate; Date: 17/  |                                    | <b>202</b> 7  |   |                |
|                          |  |  | tate; Date: 06  | •                                  |   |   |                |
| 1                        |  |  | M; Date: 09/0   |                                    |   |   |                |
|                          |  | - Sagil Estat                                      | e; Date: 04/0   | 3/2024                             |   |   |                |
|                          |  |  |   |                                    |   | policy during the<br>ternal parties dated   |                |
| 4.1.2                    | The unit of certification does not instigate violence or use any form of harassment in their operations.  - Minor compliance -   | relevant exte                                      | rnal stakeholo<br>not instigate v   | ders, the r                        | mill and e  | mong workers as well<br>estates within Gomali<br>orm of harassment in   | Complied       |
| <b>Criterio</b> affected | on 4.2: There is a mutually agreed and documented system for parties   | r dealing with o                                   | complaints and  | d grievano                         | es, which   | is implemented and a  | ccepted by all |
| 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 - | blowing that<br>parties. Intervi<br>and relevant e | requires anon<br>ew conducted<br>xternal stakeh<br>table provides<br>cases, and spe | ymity of on with interrollers also | complainal<br>nal stakeho<br>confirme<br>y of new o | es no issue of whistle-<br>nts and/or grievance<br>olders among workers<br>d the information.<br>cases recorded, cases<br>stakeholders in | Complied       |
|                          |  | Estate<br>Name                                     | New<br>Cases<br>Recorded  | New<br>Cases<br>Closed             | Active<br>Cases                                     | Remarks / To<br>Clarify   |                |
|                          |  | Gomali Mill  | 110   | 108                                | 2   | Workers request water dispensers  |                |

|                     |     |     |   | and new nets for windows in every house. Planned for next year's budget.  |
|---------------------|-----|-----|---|---|
| Gomali<br>Estate    | 42  | 40  | 2 | Requests from internal and external stakeholders for directional signs to schools.                                |
| Paya Lang<br>Estate | 64  | 62  | 2 | Requests for power plugs in schools and a restroom at a religious site. To be included in the next year's budget. |
| Tambang<br>Estate   | 57  | 57  | 0 | No additional remarks.  |
| Sagil Estate        | 171 | 169 | 2 | Requests for toilet repairs and additional cement in front of the clinic due to muddy conditions.                 |

| Regent<br>Estate             | 174 | 172 | 2 | Request from JKR to upgrade a waiting line at the main road entrance.                              |
|------------------------------|-----|-----|---|--|
| Bahau<br>Estate              | 172 | 171 | 1 | Drainage repair at workers' housing sites needed.  |
| Kuala Jelei<br>Estate        | 62  | 62  | 0 | No additional remarks.   |
| Bertam<br>Estate             | 22  | 20  | 2 | Employees request new paint for the security guardhouse and a "don't litter" sign at the entrance. |
| Jasin Lalang                 | 27  | 27  | 0 | No additional remarks.   |
| Bukit<br>Dinding<br>Estate   | 46  | 44  | 2 | Requests for setting up shops and organizing a monthly night market within the estate.             |
| Bukit<br>Serampang<br>Estate | 62  | 62  | 0 | No additional remarks.   |

| 4.2.2 | Procedures are in place to ensure that the system is  | Procedures are in place as following:   | Complied |
|-------|---|---|----------|
|       | understood by the affected parties, including by illiterate parties.  | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |          |
|       | - Minor compliance -  | - Employee Grievance Procedure; Ref. # IOI/G/SE/017; Rev. 01; Date: 28/11/2023  |          |
|       |   | - Stakeholder Complaint Flowchart; Ref. # SOP 6.11; Rev. 1B; Date: 17/01/2017   |          |
|       |   | - Stakeholder Request Flowchart; Reference: SOP 6.11; Rev. 1B; Date: 28/12/2020   |          |
|       |   | Interview conducted with internal stakeholders among workers and relevant external stakeholders confirmed that the procedures were explained and understood to them to apply in case of any.          |          |
|       |   | The management has conducted the training for all the workers and details the process accordingly. Illiterate workers was informed together during the training                                       |          |
| 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 | Explanation made mainly during stakeholder consultation meeting documented in Minutes of Meeting form; Doc. Rev. # 03; Issue date: 01/12/2021 as following:   | Complied |
|       | stakeholders Minor compliance -   | - Bukit Dinding Estate; Stakeholder consultation meeting date: 23/04/2024   |          |
|       |   | - Bahau Estate & Kuala Jelei Estate; Stakeholder consultation meeting date: 24/04/2024  |          |
|       |   | - Regent Estate; Stakeholder consultation meeting date: 25/04/2024  |          |
|       |   | - Gomali POM; Stakeholder consultation meeting date: 25/04/2024   |          |
|       |   | - Sagil Estate; Stakeholder consultation meeting date: 29/04/2024   |          |
|       |   | Relevant records verified that the outcome is available and communicated to relevant stakeholders. There are still some on-going feedbacks by internal stakeholders/workers mainly related to housing |          |

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|          |   | repair requests. Notwithstanding, the records indicating on-time resolution communicated back by management and acknowledged by complainants accordingly.   |              |
|----------|---|---|--------------|
| 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 - | The conflict resolution mechanism specified in the Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020 that includes the option to independent legal and technical advice and ability for complainants to choose freely.  | Complied     |
| Criterio | on 4.3: The unit of Certification contributes to local sustainable of   | development as agreed by local communities.   |              |
| 4.3.1    | Contributions to community development that are based on the results of consultation with local communities are demonstrated.  - Minor compliance -   | Contributions made to community development based on the results of consultation with as well as requests by local communities were demonstrated as per sample as following:  - Bahau Estate: Chicken contributions to workers for festive season; 08/04/2024  - Regent Estate: Host for SMK Dato' Mohd. Taha school sports cross-country events; Date: 19/04/2024  - Gomali POM: Contribution of Black Soil for School MyKebun Program to SJKC Hwa Nan Batu Anam Segamat; Date: 08/05/2024  - Gomali POM: Contribution of Black Soil for School MyKebun Program to SMK Dato Ahmad Arshad Batu Anam Segamat; Date: 15/03/2024  - Gomali POM: Contribution for Student Excellence Award Ceremony to PIBG SK Kampong Awat; Date: 18/02/2024 | Complied     |
| Criterio | on 4.4: Use of the land for oil palm does not diminish the legal, o   | customary or user rights of other users without their free, prior and inform  | med consent. |
| 4.4.1    | <b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC)   | Ownership documents available in all operating units as verified as following:  | Complied     |

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|        |   | ,   |                   |
|--------|---|---|-------------------|
|        | process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.  - Critical (Major) compliance -  | <ul> <li>Bukit Dinding Estate total land titles: 17; Total area: 1,660.4495 ha</li> <li>Bahau Estate total land titles: 15; Total area: 2,829.71 ha</li> <li>Regent Estate total land titles: 22; Total area: 2,300.21 ha</li> <li>Sagil Estate total land titles: 9; Total area: 2,504.99 ha</li> <li>Gomali POM land title under Paya Lang Estate (Total: 16)</li> </ul>  |                   |
| 4.4.2  | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:   | <ul> <li>No dispute issue that requires FPIC process occurred in all sampled estates within Gomali Grouping. In case of any, the process will be handled based on procedures as following:</li> <li>Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020</li> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.</li> </ul> | Not<br>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, including information on the steps that are taken to involve them in decision making.  - Minor compliance - | No dispute issue that requires FPIC process occurred in all sampled estates within Gomali Grouping. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020  - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017  - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017  | Not<br>Applicable |

|        |   | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017<br>Consultation with relevant stakeholders conducted on-site confirmed<br>the information. Hence, this is not applicable.   |                   |
|--------|---|---|-------------------|
| 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 -  | <ul> <li>No dispute issue that requires FPIC process occurred in all sampled estates within Gomali Grouping. In case of any, the process will be handled based on procedures as following:</li> <li>Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020</li> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.</li> </ul> | Not<br>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 - | No dispute issue that requires FPIC process occurred in all sampled estates within Gomali Grouping. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020  - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017  - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017  - Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017  | Not<br>Applicable |

|       |  | Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is 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 - | Boundary maps available in each estate within Gomali POM complex visited as per sampled boundary stone/marking GPS verified as per sample as following:  - Regent Estate: PR 20A field marking (GPS: 2.489786; 102.416996) for boundary with Kemuning Estate (neighbour grower)  - Regent Estate: PR 09F field marking (GPS: 2.506808; 102.367400) for boundary with Rocky Surface Forest (Conservation Area)   | Complied          |
| 4.4.4 | All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.  - Minor compliance -  | <ul> <li>No dispute issue that requires FPIC process occurred in all sampled estates within Gomali Grouping. In case of any, the process will be handled based on procedures as following:</li> <li>Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020</li> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.</li> </ul> | Not<br>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.  - Critical (Major) compliance -   | No dispute issue that requires FPIC process occurred in all sampled estates within Gomali Grouping. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020  | Not<br>Applicable |

| 101  | 4.4.6    | There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.  - Minor compliance -  | <ul> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.</li> <li>No dispute issue that requires FPIC process occurred in all sampled estates within Gomali Grouping. In case of any, the process will be handled based on procedures as following:</li> <li>Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020</li> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed</li> </ul>   | Not<br>Applicable |  |
|--|----------|--|--|-------------------|--|
| 4.5.1 <b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.  - Critical (Major) compliance -  No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process | their FP | <b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user righter FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own re- |  |                   |  |
| demonstrable legal, customary and user rights are available Critical (Major) compliance -  and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process  |          |  | No work a seried land and invest of land of la | NI-+              |  |
|  | 4.5.1    | demonstrable legal, customary and user rights are available.   | and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process   | Not<br>Applicable |  |

| 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 - | <ul> <li>Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020</li> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.</li> <li>No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:</li> <li>Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020</li> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.</li> </ul> | Not<br>Applicable |
|-------|---|---|-------------------|
| 4.5.3 | Evidence is available that affected local peoples understand<br>they have the right to say 'no' to operations planned on their<br>lands before and during initial discussions, during the stage of<br>information gathering and associated consultations, during  | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:   | Not<br>Applicable |

|       | 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 -   | <ul> <li>Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020</li> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.</li> </ul>  |                   |
|-------|--|---|-------------------|
| 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 - | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020  - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017  - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017  - Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017  Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable. | Not<br>Applicable |
| 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,   | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:   | Not<br>Applicable |

|       | concerning the legal, economic, environmental and social implications of the proposed operations on their lands.  - Minor compliance -   | <ul> <li>Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020</li> <li>Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017</li> <li>Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017</li> <li>Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017</li> <li>Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.</li> </ul>  |                   |
|-------|--|---|-------------------|
| 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 -         | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020  - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017  - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017  - Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017  Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable. | Not<br>Applicable |
| 4.5.7 | New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:   | Not<br>Applicable |



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|       | - Minor compliance -  | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |                   |
|-------|---|---|-------------------|
|       |   | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |                   |
|       |   | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |                   |
|       |   | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |                   |
|       |   | Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.   |                   |
| 4.5.8 | (C) New lands are not acquired in areas inhabited by communities in voluntary isolation.  - Critical (Major) compliance - | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following: | Not<br>Applicable |
|       |   | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |                   |
|       |   | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |                   |
|       |   | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |                   |
|       |   | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |                   |
|       |   | Consultation with relevant stakeholders conducted on-site confirmed the information. Hence, this is not applicable.   |                   |

**Criterion 4.6:** Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

| 4.6.1 | <b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.  - Critical (Major) compliance -   | No issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following: | Complied |
|-------|--|---|----------|
|       |  | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |          |
|       |  | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |          |
|       |  | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |          |
|       |  | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |          |
|       |  | Consultation with relevant stakeholders conducted on-site confirmed the information.  |          |
| 4.6.2 | (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.  - Critical (Major) compliance - | No issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following: | Complied |
|       |  | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |          |
|       |  | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |          |
|       |  | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |          |
|       |  | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |          |
|       |  | Consultation with relevant stakeholders conducted on-site confirmed the information.  |          |

| 4.6.3 | Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.  - Minor compliance -  | No issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following: | Complied |
|-------|---|---|----------|
|       |   | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |          |
|       |   | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |          |
|       |   | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |          |
|       |   | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |          |
|       |   | Consultation with relevant stakeholders conducted on-site confirmed the information.  |          |
| 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. | No issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following: | Complied |
|       | - Minor compliance -  | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |          |
|       |   | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |          |
|       |   | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |          |
|       |   | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |          |
|       |   | Consultation with relevant stakeholders conducted on-site confirmed the information.  |          |



|       | Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.       |   |          |  |
|-------|---|---|----------|--|
| 4.7.1 | (C) A mutually agreed procedure for identifying people entitled to compensation is in place.  - Critical (Major) compliance -   | No issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following: | Complied |  |
|       |   | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |          |  |
|       |   | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |          |  |
|       |   | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |          |  |
|       |   | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |          |  |
|       |   | Consultation with relevant stakeholders conducted on-site confirmed the information.  |          |  |
| 4.7.2 | <b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken | No issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following: | Complied |  |
|       | as a result of this evaluation Critical (Major) compliance -  | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |          |  |
|       |   | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |          |  |
|       |   | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |          |  |
|       |   | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |          |  |

|                         |   | Consultation with relevant stakeholders conducted on-site confirmed the information.  |                |
|-------------------------|---|---|----------------|
| 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.   | No issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:                         | Complied       |
|                         | - Minor compliance -  | - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020   |                |
|                         |   | - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017   |                |
|                         |   | - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017   |                |
|                         |   | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017   |                |
|                         |   | Consultation with relevant stakeholders conducted on-site confirmed the information.  |                |
| <b>Criterio</b> or user |   | mately contested by local people who can demonstrate that they have leg   | al, customary, |
| 4.8.1                   |   |   |                |
| 7.0.1                   | 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   | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following: | Complied       |
| 4.0.1                   | 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 | and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process  | Complied       |
| 7.0.1                   | acquisition of title and evidence that mutually agreed<br>compensation has been made to all people who held legal,<br>customary, or user rights at the time of acquisition is available<br>and provided to parties to a dispute, and that any   | and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date:            | Complied       |

|       |  | - Negotiation Procedure Through Free, Prior and Informed Consent;<br>Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017  |          |
|-------|--|--|----------|
| 4.8.2 | (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.  - Critical (Major) compliance - | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020  - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017  - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017  - Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017 | Complied |
| 4.8.3 | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)  - Minor compliance -   | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020  - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017  - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017  - Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017 | Complied |

|         | 1   |  |                   |
|---------|---|--|-------------------|
| 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 - | No newly acquired land and issues of loss of legal rights, user rights and customary land occurs in all estates within Gomali Grouping that requires FPIC process since the last audit. In case of any, the process will be handled based on procedures as following:  - Grievance Procedure; Ref. # IOI/P/GP/001; Rev. 01; Date: 20/01/2020  - Grievance Procedure for Landowner Issues; Ref. # 6.11; Appendix 4; Rev 1A; Date: 17/01/2017  - Land Use Compensation Procedure; Ref. # 6.11; Appendix 8; Rev. 1A; Date: 17/01/2017  - Negotiation Procedure Through Free, Prior and Informed Consent; Ref. # 6.11; Appendix 5; Rev. 1A; Date: 17/01/2017 | Complied          |
|         | ole 5: Support smallholder inclusion  |  |                   |
| Criteri | on 5.1: The unit of certification deals fairly and transparently wit  | h all smallholders (Independent and Scheme) and other local businesses.  |                   |
| 5.1.1   | Current and previous period prices paid for FFB are publicly available and accessible by smallholders.  - Minor compliance -  | IOI Gomali POM is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable  | Not<br>Applicable |
| 5.1.2   | (C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).  - Critical (Major) compliance -                | IOI Gomali POM is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.   | Not<br>Applicable |
| 5.1.3   | <b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.   | IOI Gomali POM is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not   | Not<br>Applicable |



|       | - Critical (Major) compliance -  | receive FFB from third parties in Indicator is not applicable.  | ncluding smallholders. Therefore, the  | his                     |                   |
|-------|--|---|--|-------------------------|-------------------|
| 5.1.4 | (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.  - Critical (Major) compliance - | strictly sourced FFB from its own   | reserved Mill and has exclusively an group of estates. The Mill does recluding smallholders. Therefore, the  | not                     | Not<br>Applicable |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe.  - Minor compliance -  | contracts entered into with contrand have an agreed timeframe. of the services provided by the timeframe for payment, termina | ase were able to demonstrate the actors are fair, legal and transpare. The contracts also contain descripting contractor, the amount payabation clause, rights and obligations in sampled contractors also confirmand transparent. | ent<br>on<br>ole,<br>of | Not<br>Applicable |
| 5.1.6 | (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.  - Critical (Major) compliance -  | strictly sourced FFB from its own   | reserved Mill and has exclusively an group of estates. The Mill does recluding smallholders. Therefore, the  | not                     | Not<br>Applicable |
| 5.1.7 |  |   | n conducted by De Metrology Sdn B<br>ng on weighbridge has been verifie  |                         | OFI               |
|       | (this can be government) Minor compliance -  | Weighbridge No: 1   | Weighbridge No: 3  |                         |                   |
|       | - Fillior Compilance -   | Date: 09/08/2023  | Date: 14/06/2023   |                         |                   |
|       |  | Cert No: B2166134   | Cert No: B2166395  |                         |                   |
|       |  | Capacity: 80,000 Kg   | Capacity: 80,000 Kg  |                         |                   |

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|          |  | Weighbridge No 2 is under maintenance, and will be stamp in June 2024. The management has received the Proforma Invoice from Metrology Corporation Malaysia Sdn Bhd dated 16/05/2024. At the moment, the weighbridge is not in use, as the calibration of the weighbridge was expired on 08/02/2024 with the Certificate Number: B2166282   |                   |
|----------|--|---|-------------------|
| 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 - | IOI Gomali POM is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.  | Not<br>Applicable |
| 5.1.9    | <ul><li>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</li><li>- Critical (Major) compliance -</li></ul>  | IOI Gomali POM is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.  | Not<br>Applicable |
| Criterio | on 5.2: The unit of certification supports improved livelihoods of   | smallholders and their inclusion in sustainable palm oil value chains.  |                   |
| 5.2.1    | The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.  - Minor compliance -                                    | Management has communicated on RSPO Certification with interested smallholders during stakeholder meeting dated 06/03/2024. The management has communicated the smallholder service. Refer Minutes of meeting on communication related RSPO Certification. Verification through interview with Mill Management confirmed there is no smallholders involved as a supplier of FFB. Gomali POM only received certified FFB from supply base within Certification Units Group and diverted crop from sister estate under IOI if any. As the date of audit, there is no FFB supplied from Smallholders. Therefore, this indicator is not applicable. | Not<br>Applicable |

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| 5.2.2 | The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).  - Minor compliance - | Management has communicated on RSPO Certification with interested smallholders during stakeholder meeting dated 06/03/2024. The management has communicated the smallholder service. Refer Minutes of meeting on communication related RSPO Certification. Verification through interview with Mill Management confirmed there is no smallholders involved as a supplier of FFB. Gomali POM only received certified FFB from supply base within Certification Units Group and diverted crop from sister estate under IOI if any. As the date of audit, there is no FFB supplied from Smallholders. Therefore, this indicator is not applicable. | Not<br>Applicable |
|-------|---|---|-------------------|
| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.  - Minor compliance -   | Management has communicated on RSPO Certification with interested smallholders during stakeholder meeting dated 06/03/2024. The management has communicated the smallholder service. Refer Minutes of meeting on communication related RSPO Certification. Verification through interview with Mill Management confirmed there is no smallholders involved as a supplier of FFB. Gomali POM only received certified FFB from supply base within Certification Units Group and diverted crop from sister estate under IOI if any. As the date of audit, there is no FFB supplied from Smallholders. Therefore, this indicator is not applicable. | Not<br>Applicable |
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling Critical (Major) compliance -   | The mill received only certified crop from the Group Estate with occasionally diversion from other IOI estates in event of any sister mill annual maintenance. No association to any scheme smallholders involved with the Gomali Palm Oil Mill, the mill has communicated on the pesticide handling during the stakeholder meeting, through the smallholder support service. However, there is no feedback from the villagers on the service, thus the indicator is not applicable.  | Not<br>Applicable |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.  | The mill received only certified crop from the Group Estate with occasionally diversion from other IOI estates in event of any sister mill annual maintenance. No association to any scheme smallholders  | Not<br>Applicable |

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|          | - Minor compliance -  | involved with the Gomali Palm Oil Mill. Therefore, this indicator is not applicable.   |          |
|----------|---|--|----------|
| Princip  | le 6: Respect workers' rights and conditions  |  |          |
| Criterio | 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 - | A publicly available non-discrimination and equal opportunity policies were displayed in various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. In addition, IOI Group company's website also accessible with public information such as Sustainability Palm Oil Policy available via website link: <a href="https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy">https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy</a> . There's also Grievance Procedure and Special Complaints information available via website link: <a href="https://www.ioigroup.com/sustainability/grievances">https://www.ioigroup.com/sustainability/grievances</a> Interview conducted on-site with sampled internal and external stakeholders confirmed that no practice of discrimination by the company with equal opportunity provided to all employees. | Complied |
| 6.1.2    | (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.  - Critical (Major) compliance -   | Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against and there is no recruitment fees was taken by any party from home country to estates.   | Complied |
| 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 -  | No discrimination based on religion, gender, nationality and etc. during their recruitment and promotion. The recruitment and promotion process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed from job vacancy advertisement and sample recruitment sighted.   | 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 - | Pregnancy tests were conducted by management of mill and estates within Gomali Grouping for the purpose of female workers' health and safety wellbeing and not as a discriminatory measure. This also confirmed by sampled female employees and representatives of Women Empowerment Committee (WEC) through on-site consultation.   | Complied |
|-------|--|--|----------|
| 6.1.5 | (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.  - Critical (Major) compliance -          | A gender committee is in place namely Women Empowerment Committee (WEC) to raise awareness, identify and address issues of concern and opportunities as well as improvements for women. Verified records of WEC activities ranging from awareness training to meeting as per sample as following:  - Regent Estate WEC Meeting; Date: 22/03/2024  - Sexual Harassment Reporting Procedure Training (female); Date: | Complied |
|       |  | 22/03/2024   |          |
|       |  | - Sexual Harassment Reporting Procedure Training (male); Date: 23/03/2024  |          |
|       |  | - Sagil Estate Gender Committee (Women Empowerment Committee - WEC) Meeting; Date: 08/12/2023  |          |
|       |  | There is specific procedure for raising issues by women employees via WEC Complaints/Suggestions/Proposals/Information Form Rev. # 02; Issue date: 01/12/2020. There's also Reproductive Health Guidelines established for WEC.  |          |
| 6.1.6 | There is evidence of equal pay for the same work scope Minor compliance -  | Work agreement and pay documents were reviewed for sample estate workers among Mandores, Harvesters, Sprayers, Drivers, Security Guards and General Workers etc. and mill operators among Process Workers, Workshop Apprentices, FFB Graders and Lab Operators etc. as following:  | Complied |
|       |  | - Bukit Dinding Estate: 12 samples out of total 140 workers  |          |
|       |  | - Bahau Estate: 15 samples out of total 216 workers  |          |



| Criterio | on <b>6.2:</b> Pay and conditions for staff and workers and for contract   | <ul> <li>Regent Estate: 14 samples out of total 207 workers</li> <li>Sagil Estate: 18 samples out of total 334 workers</li> <li>Gomali POM: 13 samples out of total 161 workers</li> <li>Based on the samples pay documents, no evidence of discrimination with equal pay scheme implemented for the same work scope.</li> <li>workers always meet at least legal or industry minimum standards and an experience of the same work.</li> </ul>  | re sufficient to |
|----------|--|---|------------------|
| 6.2.1    | (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.  - Critical (Major) compliance - | All the workers are under direct employment or mill and estates payroll. The pay slips included basic income, allowance pay, working days, medical leave, and deduction of salary etc. as per employment contract in compliance with employment act, minimum wage order, applicable collective agreements and sample permits as per sample as following:  - Bukit Dinding Estate: JTK salary deduction permit (electricity); Ref. # JTK.PHG600-2/11/3(35)  - Bahau Estate: JTK salary deduction permit (TNB electricity); Ref. # PMT 10502/2022/0012(3); Validity period: 23/10/2022 – 22/10/2025  - Bahau Estate: JTK salary deduction permit (SAINS water); Ref. # PMT 10502/2022/0013(3); Validity period: 23/10/2022 – 22/10/2025  - Regent Estate: JTK salary deduction permit (TNB electricity); Ref. # PMT 10501/2024/0031(4); Validity period: 04/04/2024 – 03/04/2027  - Regent Estate: JTK salary deduction permit (SAINS water); Ref. # PMT 10501/2024/0030(4); Effective date: 04/04/2024 | Complied         |
|          |  | PMT 10501/2024/0030(4); Effective date: 04/04/2024  The work terms and conditions were explained to workers upon their recruitment and in case of update of any applicable requirements as  |                  |

|       |  | per sample conducted by Regent Estate management to the workers as following:  Explanation of Payslip and Workers' Work Verification and Vacation Leave Pay; Date: 12/02/2024  |          |
|-------|--|--|----------|
| 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. This includes a form of record for work done by family members.  - Critical (Major) compliance - | Employment contracts and offer letters for local workers and foreign workers is available. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per applicable NUPW collective agreement and employment act which have been signed by the worker.   | Complied |
| 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 -   | Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above.  The company is using Electronic Plantation Mobile Solution (EPMS) as its method to record working hours and overtime. The data will then be transferred to the SAP system for wages calculation. Employees can be transparently provided with the information in the EPMS.  Records shown all relevant legal compliance requirements were met by the mill and sampled estates within Gomali Grouping. | Complied |
| 6.2.4 | <b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade                                     | Housing provision to all workers were monitored based on company's Guidelines for Providing Basic Amenities to Workers; Doc. Ref. # IOI/G/SE/009/ Rev. # 01; Issue date: 04/12/2020. There's also a Home Hygiene and Cleanliness Procedures which specifies the requirement to maintain the good conditions of housing of following:  - Indoor - Surrounding   | Complied |

|       | of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.  - Critical (Major) compliance -   | <ul> <li>Drain</li> <li>Rubbish</li> <li>Each estate provided with a clinic and an appointed Medical Assistant as per sample as following.</li> <li>Bahau Estate Medical Assistant (MA) Ganes A/L Manickam; MA Reg. Cert. # Q1826; Date: 13/01/1999</li> <li>Records of housing upkeep and monitoring maintained as per sample as following:</li> <li>Bahau Estate: Latest VMO visit date: 22/05/2024</li> <li>Regent Estate: Home Hygiene and Cleanliness Training; Date: 23/03/2024</li> <li>Regent Estate: Housing repair request form ref. # IOI/P/F/MHIC; Rev. # 01; Issue date: 23/08/2021</li> <li>Gomali POM: Monitoring Checklist – Linesite; Rev. 2b; Eff. Date: 07/12/2020; Housing Inspection Week 3 date: 20/05/2024; Week 4 date: 27/05/2024</li> <li>Sagil Estate: Grocery/Canteen Checklist; Rev. # 01; Issue date: 01/12/2021</li> </ul> |          |
|-------|--|---|----------|
| 6.2.5 | The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.  - Minor compliance -  | The mill and estates within Gomali Grouping ensured affordable food for its employee through canteen food price monitoring as per sample food price monitoring by Bahau Estate sundry shop latest dated 15/02/2024.   | Complied |
| 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:  STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE | No DLW set by Malaysian government yet however there's Minimum Wage Order (MWO) which effective from May 2022 was set as RM1,500/month for workers in applicable industry including plantation. Based on the MWO benchmark, the IOI Plantation Sustainability Department personnel has conducted the Prevailing Wage Assessment   | Complied |



With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).

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

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.

For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).

(PWA) for all plantation workers among mill and estates for Combined Gomali Grouping (per worker) as following:

- Total In-kind Benefit: RM9,921.00

- Total operating unit: 12

Average in-kind benefit: RM826.75

Food basket: RM750

NFNH (exclude in-kind benefit): RM516.00

Total Minimum Wages: RM1,500.00

Prevailing Wages: RM2,092.75

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|          | Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:  • Updated assessment on prevailing wages and in-kind benefits  • There is annual progress on the implementation of living wages  • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment  • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.  - Minor compliance - |   |          |
|----------|--|---|----------|
| 6.2.7    | Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal - Minor compliance -  | Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed by estates within Gomali Grouping.   | Complied |
| right to |  | nel to form and join trade unions of their choice and to bargain collective under law, the employer facilitates parallel means of independent and fr  |          |
| 6.3.1    | (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.  - Critical (Major) compliance -   | A publicly available statement recognizing freedom of association and right to collective bargaining policies were displayed in various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. In addition, IOI Group company's website also accessible with public information such as Sustainability Palm Oil Policy available via website link: <a href="https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy">https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy</a> . Interview conducted on-site with sampled workers and union representatives confirmed that all employees are free to join union and IOI contributed part of the union (NUPW) monthly member fee. | Complied |

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| 6.3.2   | Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.  - Minor compliance - | Minutes of meeting available in languages understood by all workers as per samples verified as following:  - Bahau Estate JCC meeting date: 20/05/2024  - Regent Estate JCC meeting date: 22/05/2024  - Sagil Estate JCC meeting date: 23/05/2024  There's also briefing conducted by management as per sample verified for Sagil Estate Employee Consultative Committee (ECC) and Joint Consultative Committee (JCC) Procedure training; Date: 04/03/2024.  | 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 -          | Management does not interfere with the formation and selection of workers' representatives as per sample Sagil Estate Election of Joint Consultative Committee (JCC); Date: 15/03/2023 of following:  - Local workers' representatives  - India workers' representatives  - Bangladesh workers' representatives  - Nepal workers' representatives  - Indonesia workers' representatives  | Complied |
| Criteri | 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 -  | A formal policy for the protection of children, including prohibition of child labour and remediation were displayed in various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. In addition, IOI Group company's website also accessible with public information such as Sustainability Palm Oil Policy available via website link: <a href="https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy">https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy</a> .  All contractors are required to sign the Additional Requirements for Contractors and Services Provider; Ref. # 04; Issue date: 04/02/2024 which clearly specified that the vendors are required to adhere | Complied |

|       |  | disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.   |          |
|-------|--|---|----------|
| 6.4.2 | (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.  - Critical (Major) compliance - | Based on the on-site assessment visit consist of interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Gomali Grouping.  | Complied |
|       |  | Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job. Visit to the line-site and field also did not reveal any persons under 18 years old working.   |          |
| 6.4.3 | (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.  - Critical (Major) compliance -  | Based on the on-site assessment visit consist of interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Gomali Grouping.  | Complied |
|       |  | Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job. Visit to the line-site and field also did not reveal any persons under 18 years old working.   |          |
| 6.4.4 | The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.  - Minor compliance -    | Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them. Records of communication also available as per Contractor Document Checklist; Rev. # 03 Issue date: 30/12/2022 for sample contractor as following: | Complied |
|       |  | - Bukit Dinding Estate Contractor: Sinar YSM Enterprise; Contract # BDE/006-23/24 - Collecting Debris; Period: 01/07/2023 - 30/06/2024  |          |



|          |  | <ul> <li>Bukit Dinding Estate Contractor: Kanapathy Manikam; Contract # BDE/002-23/24 - Grass Cutting; Period: 01/10/2023 - 30/06/2024</li> <li>Bahau Estate Contractor: Farm Chap Lee; Contract # BHE/001-23/24 - Hiring Backhoe; Period: 01/07/2023 - 30/06/2024</li> <li>Bahau Estate Contractor: Sinar YSM Enterprise; Contract # BHE/002-23/24 - Collecting Debris; Period: 01/07/2023 - 30/06/2024</li> <li>Regent Estate Contractor: Kim Soon Lee Transport Sdn. Bhd.; Contract # RGE/004-2324 - External FFB Transport; Period: 01/07/2023 - 30/06/2024</li> <li>Regent Estate Contractor: SL Contract Works; Contract # RGE/009-23/24 - EFB Mulching; Period: 01/07/2023 - 30/06/2024</li> <li>Sagil Estate Contractor: Metallic Milestone Sdn. Bhd.; Contract # RGE/009-23/24 - External FFB Transport; Period: 01/01/2024 - 30/06/2024</li> </ul> |          |
|----------|--|--|----------|
| Criterio | on <b>6.5:</b> There is no harassment or abuse in the workplace, and r   | , ,  |          |
| 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.  - Critical (Major) compliance - | A policy to prevent sexual and all other forms of harassment and violence were displayed in various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. In addition, IOI Group company's website also accessible with public information such as Sustainability Palm Oil Policy available via website link: <a href="https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy">https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy</a> . Communications were made from time to time by management to workers during daily assembly and muster roll-call as per sample as following:  - Bukit Dinding Estate; Date: 14/05/2024 - Bahau Estate; Date: 17/01/2024  | Complied |

|       |  | - Regent Estate; Date: 06/02/2024   |          |
|-------|--|---|----------|
|       |  | - Gomali POM; Date: 09/02/2024  |          |
|       |  | - Sagil Estate; Date: 04/03/2024  |          |
|       |  | Interview with workers at each estate verified that there is no harassment including sexual harassment happened at each operating unit.   |          |
| 6.5.2 | <b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.  - Critical (Major) compliance - | A policy to protect the reproductive rights of all, especially of women were displayed in various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. In addition, IOI Group company's website also accessible with public information such as Sustainability Palm Oil Policy available via website link: | Complied |
|       |  | https://www.ioigroup.com/sustainability/sustainable-palm-oil-policy.  |          |
|       |  | Communications were made from time to time by management to workers during daily assembly and muster roll-call as per sample as following:  |          |
|       |  | - Bukit Dinding Estate; Date: 14/05/2024  |          |
|       |  | - Bahau Estate; Date: 17/01/2024  |          |
|       |  | - Regent Estate; Date: 06/02/2024   |          |
|       |  | - Gomali POM; Date: 09/02/2024  |          |
|       |  | - Sagil Estate; Date: 04/03/2024  |          |
|       |  | Interviewed with female staff confirmed that there is no prevention from the employer for workers to reproduce.   |          |
| 6.5.3 | Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.  - Minor compliance -  | Management has assessed the needs of new mothers via its Women Empowerment Committee (WEC) via consultation as necessary when there are newly delivered babies by female employees identified by WEC. Among actions to address the needs of new mothers including   | Complied |

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|          |   | provision of private space for breastfeeding or pumping within office and unrecorded time off for babies' doctor appointment.  |          |
|----------|---|--|----------|
| 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 -   | IOI established an online grievance mechanism via IOI Mesra apps which can be installed in employees' smartphone. There's also Grievance Procedure and Special Complaints information available via website link:  | Complied |
|          | ·   | https://www.ioigroup.com/sustainability/grievances   |          |
|          |   | Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.   |          |
| Criterio | on 6.6: No forms of forced or trafficked labour are used.   |  |          |
| 6.6.1    | <ul> <li>(C) All workers have entered into employment voluntarily and the following are prohibited:</li> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees.</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> <li>Penalty for termination of employment</li> <li>Debt bondage</li> <li>Withholding of wages</li> <li>Critical (Major) compliance -</li> </ul> | In case of foreign workers' recruitment, the recruitment cost will be declared by the labour agent from source country for the applicable fees for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.  Passport was kept by the workers' themselves and management provided lockers for its safekeeping in the house.  Overtime was given voluntarily. Sighted the overtime request form where employer offer work to worker after working hour/rest day/public holiday.  The termination of service clearly stated that the termination of employment if:  - The company is not satisfied with worker's performance  - Worker end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. | Complied |
|          |   | - Worker commits any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.   |          |

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|       |   | - Worker have breached any express or implied terms of employment.   |          |
|-------|---|--|----------|
|       |   | - Fail medical examination based on FOMEMA result.   |          |
|       |   | - Involved in any act that will affect the reputation of the company.  |          |
|       |   | No penalty, debt bondage and withholding of wages been imposed to worker if they want to resign. This has been confirmed through the interview and employment contract signed.   |          |
| 6.6.2 | (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.  - Critical (Major) compliance - | Gomali Grouping has implemented an IOI's SPOP where they committed as below:   | Complied |
|       |   | - Providing equal opportunity  |          |
|       |   | - Respecting freedom of association  |          |
|       |   | - Eradicating any form of exploitation   |          |
|       |   | - Ensuring favorable working conditions  |          |
|       |   | - Enhancing Safety and Health  |          |
|       |   | They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. Communications were made from time to time by management to workers during daily assembly and muster roll-call as per sample as following: |          |
|       |   | - Bukit Dinding Estate; Date: 14/05/2024   |          |
|       |   | - Bahau Estate; Date: 17/01/2024   |          |
|       |   | - Regent Estate; Date: 06/02/2024  |          |
|       |   | - Gomali POM; Date: 09/02/2024   |          |
|       |   | - Sagil Estate; Date: 04/03/2024   |          |

**Criterion 6.7:** The unit of certification ensures that the working environment under its control is safe and without undue risk to health.

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**(C)** The responsible person(s) for H&S is identified. There are Complied 6.7.1 The company has established the OHS Roles & Responsibilities Procedure (IOI/OHSMS/PROC/13/00, Rev. No. 00, dated 01/09/2022) records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and and the Workers Consultation & Participation Procedure welfare are discussed at these meetings, and any issues raised (IOI/OHSMS/PROC/14/00, Rev. No. 00, dated 01/09/2022), These procedures define the responsibility, accountability, and authority for are recorded. the development, implementation, and performance of the OHS - Critical (Major) compliance -Management System at the company. For instance, the manager of the operating centre is required to provide leadership support as well as financial support to the Safety & Health Committee to ensure a safe working place and effective OHSMS. Bukit Dinding Estate: The Occupational Safety and Health (OSH) Organization Committee was updated on 15/01/2024. It consists of a chairman, a secretary, six employer representatives, six worker representatives, and two contractor representatives. The appointment letter for the chairman was issued by the PC on 15/01/2024, and the appointment letters for the secretary, employer representatives, and worker representatives were issued by the Estate Manager on the same day. Bahau Estate: The OSH Organization Committee was updated on 12/01/2024. It includes a chairman, a secretary, ten employer representatives, ten worker representatives, and one contractor representative. The appointment letter for the chairman was issued by the PC on 22/01/2024, and the appointment letters for the secretary, employer representatives, worker representatives, and contractor representative were issued by the Estate Manager on the same day. Regent Estate: The OSH Organization Committee was updated on 18/03/2024. It comprises a chairman, a secretary, ten employer representatives, ten worker representatives, and one contractor

representative. The appointment letter for the chairman was



issued by the PC on 31/01/2024, and the appointment letters for the secretary, employer representatives, worker representatives, and contractor representative were issued by the Estate Manager on 18/03/2024.

- Gomali POM: The OSH Organization Committee was updated on 08/04/2024. It includes a chairman, a secretary, eighteen employer representatives, eighteen worker representatives, and four contractor representatives. The appointment letter for the chairman was issued by the Senior Manager on 01/10/2022, and the appointment letters for the secretary, employer representatives, worker representatives, and contractor representatives were issued by the Mill Manager on the same day.
- Sagil Estate: The OSH Organization Committee was updated on 25/04/2024. It consists of a chairman, a secretary, sixteen employer representatives, sixteen worker representatives, and three contractor representatives. The appointment letter for the chairman was issued by the PC on 04/04/2024, and the appointment letters for the secretary, employer representatives, worker representatives, and contractor representatives were issued by the Estate Manager on the same day.

The company has also ensured active participation of employees in the OHS Management System, as prescribed in the OSH (Safety and Health Committee) Regulations 1996. This is evident from the regular meetings held between the responsible person(s) and workers at all operating centres, including Bukit Dinding Estate, Bahau Estate, Regent Estate, Gomali POM, and Sagil Estate as below:

Bukit Dinding Estate: Meetings were conducted on 19/03/2024;
 15/12/2023; 14/09/2023; and 13/06/2023.

|       |   | <ul> <li>Bahau Estate: Meetings were conducted on 26/03/2024;<br/>20/12/2023; 22/09/2023; and 15/06/2023.</li> </ul>  |     |
|-------|---|---|-----|
|       |   | • Regent Estate: Meetings were conducted on 23/05/2024; 28/02/2024; 24/11/2023; and 18/08/2023.   |     |
|       |   | • Gomali POM: Meetings were conducted on 29/04/2024; 31/01/2024; 25/10/2023; and 18/07/2023.  |     |
|       |   | • Sagil Estate: Meetings were conducted on 28/03/2024; 20/12/2023; 22/09/2023; and 30/06/2023   |     |
|       |   | These meetings serve as a platform for discussing concerns about health, safety, and welfare, and any issues raised during these meetings are duly recorded.  |     |
| 6.7.2 | Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.  - Minor compliance - | The Emergency Response Procedure (IOI/OHSMS/PROC/16/00, Rev. No. 00, dated 01/09/2022) has been adopted by each operating centre of the UoC. The objective of this procedure is to establish, implement, and maintain processes needed to prepare for and respond to potential emergency situations. The procedure outlines the Emergency Response Plan (ERP), Emergency Response Team (ERT), Training, Communication, ERT Drills, Availability of ERT, Emergency Command Centre, PPE for Hazardous Material/Chemical & Chemical Spill Cleanup Supplies, Evacuation Maps & Assembly Points, and Evacuation Drill. | OFI |
|       |   | In addition to the procedure, there are also Emergency Response Plan Flowcharts for various scenarios including Physical Injury, Chemical Spillage (Store/Premix Area/Lab), Chemical Spillage (Field/Operation Area), Vehicle Accident, Fire Outbreak or Explosion in Office/Store/Housing, Major Spillage (Crude Palm Oil, Diesel, Lubricant, Chemical or Scheduled Waste, Effluent), Fire in Field/Peat Areas in Own or Neighbouring Estate, Storekeeper/Bagworm Treatment  |     |

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Workers/Other Workers, and Control and Prevention of COVID-19 Infection.

Accident procedures are available in both English and Bahasa Malaysia, and are explained in a language that the workforce can understand. This was verified through interviews with workers, confirming their understanding of the procedure. The SOP was briefed during training at the following dates:

- Bukit Dinding Estate: Fire Drill & ERP & ERT Training on 16/06/2023
- Bahau Estate: Fire Drill & ERP & ERT Training on 15/03/2024
- Regent Estate: Fire Drill & ERP & ERT Training on 10/05/2024
- Gomali POM: Emergency Response Plan Training on 04/04/2024
- Sagil Estate: Emergency Response Plan Training on 23/04/2024

The Procedure for First Aid (IOI-OSH 3.3.4.3, dated 01/08/2012) has been established. The operating units have provided first aid kits/boxes, located in designated places or assigned to competent first aiders. Information on the location of the first aid box, the name and contact number of the assigned first aider has been communicated through briefings, training, and displayed on notice boards. The first aid kit is monitored on a monthly basis for estates and quarterly basis for mills. Sighted the First Aider Certificate and training record as below:

 Bahau Estate: MRCS Industrial First Aid & CPR with AED Course on 25/10/2021. Sighted Certificate No. (PPC01) 14482, (PPC01) 14484, (PPC01) 14485, (PPC01) 14486, (PPC01) 14487(PPC01) 14488, (PPC01) 14489, (PPC01) 14490, (PPC01) 14491, (PPC01) 14492, (PPC01) 14493, (PPC01) 14494. All of these certificates

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- valid until 25/10/2024. Latest training conducted on 09/05/2024 by HA to first aid kit PIC (mandores, workshop attendant, etc.).
- Regent Estate: Certificate of Introduction to first aid & cardiopulmonary resuscitation course, conducted by MRCS. Sighted certificate no. (PPC01) 14495; (PPC01) 14496; (PPC01) 14497; (PPC01) 14499; (PPC01) 14500; (PPC01) 18113; (PPC01) 18117. Latest training first aid kit on 20/04/2024 by HA.
- Gomali POM: First Aid at Workplace conducted by St. John Ambulance of Malaysia from 18/09/2023 to 19/09/2023. Certificate No. FAWP/1707/2023, FAWP/1708/2023, FAWP/1709/2023, FAWP/1710/2023, FAWP/1711/2023, FAWP/1712/2023, FAWP/1713/2023, FAWP/1714/2023, FAWP/1715/2023, FAWP/1716/2023, FAWP/1717/2023, FAWP/1718/2023, FAWP/1719/2023, FAWP/1720/2023, FAWP/1721/2023, FAWP/1722/2023, and FAWP/1723/2023. All certificates valid until 14/10/2026.

The Accident/Incident Investigation and Reporting Procedure (IOI/OHSMS/PROC/20/00, Rev. No. 00, dated 01/09/2022) is in place to report incidents to the DOSH (JKKP), identify the underlying causes of an occupational injury/illness, and implement appropriate changes to minimize or eliminate the risk of reoccurrence, in compliance with the requirements of the OSHA 1994. The procedure states that all incidents shall be investigated, and the Operating Centre or other individual responsible for operations involved in an accident shall ensure that an investigation is conducted and that when appropriate, corrective actions are taken.

Each operating centre of the UoC is maintaining their own accident record. All necessary actions were taken by the management, including reporting to JKKP via JKKP 6 and conducting an investigation meeting.



|       |   | Furthermore, the accident case will be discussed during quarterly safety meetings conducted by the respective operating centre management.  Hospital Assistants (HAs) from Bukit Dinding Estate, and Sagil Estate attended the First Aid & CPR Training organized by the Malaysian Red Crescent Society on 20/05/2024. As of the time of the audit, the certificates for these HAs were not yet available. The progress of this OFI will be reviewed during the next audit.  |                    |
|-------|---|--|--------------------|
| 6.7.3 | (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.  - Critical (Major) compliance - | Gomali POM and sampled estates have provided appropriate PPE to the workers to cover all potentially hazardous operations as identified in the Hazard Identification, Risk Assessment and Risk Control (HIRARC), CHRA, and NRA.  Refer PPE Issuance record for the year 2023/2024. The estates and mill provide PPE to the employees such as apron, safety helmets, and safety shoes relevant to the work handled by the workers. Records of PPE issuance for the estate were sighted.   | Non-<br>compliance |
|       |   | During the site visit workers were observed to be in PPE. Records of PPE issued are maintained individually to all employees. Example of PPE provided to sprayers are apron, rubber glove, respirator and rubber boot for sprayer. While for harvester, the estate provided safety helmet, sickle cover, goggle, and glove. During site visit at the sampled estate, the PPE were adequately provided and implemented as per HIRARC and found tally with the record of issuance PPE. Similarly, the mill issued PPE to its employees for their protection at workplace. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.  Further verification is made by interview the sampled workers confirm |                    |



received was free, and the management did not charge any payments for the PPE. If there is any damage or it is time to change to new PPE, the worker only needs to bring the used PPE to the management and the management will issue new PPE to the worker.

The management provides adequate shower rooms and soap for employees' use after returning from activities involving chemical application. Lockers are also provided for the convenience of employees to keep clean clothes for them to use to go home. To ensure that no PPE is taken home, the management has provided an area to wash and store PPE.

Used PPE is disposed of as SW 410. The latest disposal records are as follows:

- Bukit Dinding Estate: latest disposal on 12/03/2024 via DOEapproved SW disposal contractor. Consignment No. 2024031214KRIN6Y was sighted.
- Bahau Estate: latest disposal on 07/03/2024 via DOE-approved SW disposal contractor. Consignment No. 2024030712RASIBM was sighted.
- Regent Estate: latest disposal on 18/03/2024 via DOE-approved SW disposal contractor. Consignment No. 2024031808FSZXIB was sighted.
- Gomali POM: latest disposal on 15/05/2024 via DOE-approved SW disposal contractor. Consignment No. 2024051513XP2QDH was sighted.
- Sagil Estate: latest disposal on 23/05/2024 via DOE-approved SW disposal contractor. Consignment No. 20240523133WP2EF was sighted.

|       |   | A major non-conformity (NCR # 2501725-202405-M1) has been identified against this indicator as details below:  At Bahau Estate, during the documentation review, it was noted that the management has provided Worker No. 1PIP/IOI/1115/19775 with Personal Protective Equipment (PPE) for the role of Ramp Attendant. The PPE, which included a Hard Hat, Safety Boot, Safety Vest, Cotton Gloves, Ear Plug, and Safety Harness, was supplied on 10/05/2024. This provision was in accordance with the Hazard Identification, Risk Assessment and Risk Control (HIRARC) titled Loading FFB at Ramp (Rev. No. 01, dated 15/04/2024), demonstrating the management's commitment to safety. Additionally, the worker attended a training session titled SaOP Bekerja di Ramp dan Pengredan Buah Kelapa Sawit — SaOP for Working on the Ramp and Grading of FFB (IOI/OHSMS/SaOP/EST/018/00, Rev. No. 00, dated 01/09/2022) on the same day the PPE was provided, further emphasizing the management's efforts in ensuring worker safety.  However, during the site visit, it was observed that the aforementioned worker was engaged in arranging the Fresh Fruit Bunches (FFB) on the trailer without wearing the Safety Harness. This deviation from the safety protocols outlined in the HIRARC document and the training provided is the identified non-conformity. |          |
|-------|---|--|----------|
| 6.7.4 | All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.  - Minor compliance - | Medical care is provided to all employees by the management and is covered by the Social Security Organization (SOCSO). Both management and employee contributions to SOCSO have been verified for both local and foreign workers. A review of worker profile records indicates that all workers are covered under the SOCSO scheme.  The contribution form (8A) for the mill and all sampled estates are as follows:  | Complied |

|       |  | <ul> <li>Bukit Dinding Estate: SOCSO contributions for Apr 2024 (141 workers = RM 3,457.00); Feb 2024 (138 workers = RM 3,496.50); Dec 2023 (147 workers = RM 5,320.00)</li> </ul>   |          |
|-------|--|--|----------|
|       |  | <ul> <li>Bahau Estate: SOCSO contributions for Apr 2024 (225 workers = RM 6,615.80); Feb 2024 (221 workers = RM 6,161.40); Dec 2023 (228 workers = RM 9,132.70)</li> </ul>   |          |
|       |  | • Regent Estate: SOCSO contributions for Apr 2024 (224 workers = RM 7,467.50); Feb 2024 (229 workers = RM 7,603.10); Dec 2023 (236 workers = RM 10,239.90)   |          |
|       |  | • Gomali POM: SOCSO contributions for Apr 2024 (193 workers = RM 8,899.60); Feb 2024 (196 workers = RM 8,855.30); Dec 2023 (200 workers = RM 12,630.40)  |          |
|       |  | • Sagil Estate: SOCSO contributions for Apr 2024 (331 workers = RM 10,209.10); Feb 2024 (346 workers = RM 10,226.20); Dec 2023 (340 workers = RM 14,286.70)  |          |
|       |  | In addition to this, workers can receive free medical consultations and medication at the clinic in Gomali POM UoC. This comprehensive approach ensures that all workers have access to necessary medical care and are protected under the SOCSO scheme.   |          |
| 6.7.5 | Occupational injuries are recorded using Lost Time Accident (LTA) metrics.  - Minor compliance - | All accident records are meticulously maintained and reviewed during safety meetings. Metrics on Lost Time Accident (LTA) are kept up to date. The JKKP 8 Form is submitted annually to the Department of Occupational Safety and Health (DOSH) through the MyKKP portal. The latest submissions are as follows: | Complied |
|       |  | • Bukit Dinding Estate: JKKP 8/144747/2023 was submitted on 23/01/2024. The total number of workday loss accidents was 45, resulting in 341 lost workdays. There were 2 accidents without lost workdays, making the total number of accidents 47.  |          |

|   |  | Е  | Bagworm attack                                | Conduct the census, if the population is above threshold level, chemical treatment by trunk   |  |  |
|---|--|--|---|---|--|--|
|   |  | I  | ssue / Area                                   | Action Plan   |  |  |
| 7.1.1   | (C) IPM plans are implemented and monitored to ensure effective pest control.  - Critical (Major) compliance -   | Integrated Pest Management Plan has been established for the year of 2024. The plan was monitored by person in charge with target date and completion status. Among the plan as below: |   | tored by person in charge with target date  |  |  |
|   | Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques. |  |   |   |  |  |
| Principle 7: Protect, conserve and enhance ecosystems and the environment |  |  |   |   |  |  |
|   |  | •  | The total number of v                         | 48166/2023 was submitted on 22/01/2024. workday loss accidents was 18, resulting in ere were no accidents without lost workdays, per of accidents 18. |  |  |
|   |  | •  | The total number of w                         | 145537/2023 was submitted on 15/01/2024. Forkday loss accidents was 1, resulting in 40 Were 43 accidents without lost workdays, Deer of accidents 44. |  |  |
|   |  | •  | 29/01/2024. The total resulting in 36 lost wo | KP 8/150641/2023 was submitted on number of workday loss accidents was 10, orkdays. There was 1 accident without lost total number of accidents 11.   |  |  |
|   |  | •  | The total number of w                         | 122986/2023 was submitted on 12/01/2024. orkday loss accidents was 9, resulting in 113 were no accidents without lost workdays, per of accidents 9.   |  |  |

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| 2. Promotes the biological control on pest by planting more beneficial plant  Rat attack  1. To conduct the rat damage census 2. Control the population within housing by spot baiting and traps  Rhinoceros beetle  1. Trunk chipping thickness to be carried out below 6 cm. 2. Cypermethrin usage for immature planting area  Beneficial Plant  1. To conduct the application of EFB and POME 2. To conduct training for related   | <br>   |   |
|---|--|---|
| 2. Control the population within housing by spot baiting and traps  Rhinoceros beetle  1. Trunk chipping thickness to be carried out below 6 cm.  2. Cypermethrin usage for immature planting area  Beneficial Plant  1. To conduct the application of EFB and POME   | pest by planting more beneficial   |   |
| carried out below 6 cm.  2. Cypermethrin usage for immature planting area  Beneficial Plant  1. To conduct the application of EFB and POME  | 2. Control the population within   | Rat attack  |
| and POME  | carried out below 6 cm.  2. Cypermethrin usage for immature  | Rhinoceros beetle   |
| 2 To conduct training for related   | ···  | Beneficial Plant  |
| workers   | 2. To conduct training for related workers   |   |
| 3. The pest is not rampant in the estate  | · · · · · · · · · · · · · · · · · · ·  |   |
| 4. To produce the planting beneficial plant program   | •  |   |
| 5. To ensure broken tools are collected   |  |   |
| Monitoring has been conducted by estate. The estate continues to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as <i>Cassia cobanensis</i> , <i>Turnera subulata</i> and <i>Antigonon leptopus</i> . | ol for the oil palm pest in the plantation such<br>rat. Census records show that there was<br>eating pest. Although there have been<br>eating pests, beneficial plants are being<br>es to attract natural predators and further<br>estates have planted beneficial plants such | implement biological contr<br>as leaf eating pest and<br>minimal outbreak of lea<br>minimal outbreaks of lea<br>established along roadsid<br>reduce the outbreak. The |

...making excellence a habit."

|  |   | The estate has conducted the training on IPM Management 06/04/2024 for Barn Owl Management, Bagworm & Nettle Caterpillar Training on 06/04/2024 at Bahau Estate, IPM Beneficial Plant dated 25/03/2024 at Regent Estate.  |          |  |
|--|---|---|----------|--|
| 7.1.2  | Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.  - Minor compliance -                              | Species referenced in the Global Invasive Species Database and CABI.org are not used in the estate.   | Complied |  |
| 7.1.3  | There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.  - Minor compliance - | There was no evidence of use of fire for pest control in all the estate.  | Complied |  |
| Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. |   |   |          |  |
| 7.2.1  | (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.  - Critical (Major) compliance -                      | The usage of the agrochemicals was based on the Standard Operating Procedure under subject 7.1 Weeding - Weeds & weeding and the Agrochemical Management Guidelines 28/08/2020 ref IOI/GG/SE/102 whereby written justifications had been provided for various fields operations. The SOP has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. Among types of pesticides used with justifications included:  • Bukit Dinding Estate: justified the use of pesticides such as | Complied |  |
|  |   | glyphosate isopropylamine 38.95%, metsulfuron methyl 20%, triclopyr butoxy ethyl ester 32.1%, acephate 97%, cypermethrin 16%, sodium chlorate 99%, 2,4-D dimethyl amine, 2,4-D dimethyl ammonium 60%, and imazethapyr 70% as of 31/03/2024.   |          |  |



- Bahau Estate: justified the use of pesticides such as glyphosate isopropylamine 38.95%, metsulfuron methyl 20%, triclopyr butoxy ethyl ester 32.1%, glufosinate ammonium 13.5%, floxypyr methylepthyl ester 29.6%, Imazapyr isopropylamine 11%, propineb 70%, amitraz 21.7%, cypermethrin 16%, flocoumafen 0.005%, monosodium acid methanearsonate (MSMA) 16.6%, carbosulfan 20%, and imazethapyr 70% as of 03/05/2024.
- Regent Estate: justified the use of pesticides such as glyphosate isopropylamine 38.95%, metsulfuron methyl 20%, triclopyr butoxy ethyl ester 32.1%, floxypyr methylepthyl ester 29.6%, cypermethrin 16%, flocoumafen 0.005%, Brodifacoum 0.003%, Sodium Chlorate 38.5%, monosodium acid methanearsonate (MSMA) 16.6%, Bromodiolone 0.005%, carbosulfan 20%, Indaziflam 45.5%, imazethapyr 70%, 2,4-d dimethyl amine, and 2,4-d dimethyl ammonium 40% as of 03/05/2024.
- Sagil Estate: justified the use of pesticides such as glyphosate isopropylamine 38.95%, metsulfuron methyl 20%, triclopyr butoxy ethyl ester 32.1%, glufosinate ammonium 13.5%, propineb 70%, cypermethrin 16%, flocoumafen 0.005%, chlorpyrifos 38.7%, malathion 57%, Sodium Chlorate 99%, tetrachloroisophtalonitrile (Chlorothalonil) 50%, dimethoate 38%, carbosulfan 5%, Imazethapyr 70%, and fipronil 5% as of 03/05/2024.

Purchases of pesticides are made on a centralized arrangement via Regional Office thus a control by the organization.

All chemicals usage was based on the "need to do basis" to enhance field operations. Specific pesticides had been used to deal with the respective target pest, weed, or disease. All pesticides used were those officially registered under the Pesticide Act 1974. It was verified that

|       |   | the estates confined usage to only class II, class III & class IV pesticides, and no Class I chemicals had been used.   |          |
|-------|---|---|----------|
| 7.2.2 | <b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. | The estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.  | Complied |
|       | - Critical (Major) compliance -   | (a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. Records of pesticides used were available and verified.  |          |
|       |   | (b) All pesticides used were those officially registered under the Pesticide Act 1974. The estates had used only class II, class III & class IV pesticides.   |          |
|       |   | (c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.  |          |
|       |   | Variation of chemical usage are attributed to sizes of immature areas, rainfall pattern and the regeneration growth of weeds in different type of soil series. Records of pesticides used and a.i per Ha is monitored monthly in the yearly Pesticide Records for July 2023 to June 2024 (To date April 2024) The records were sampled and available for verification as below: |          |
|       |   | • Bukit Dinding Estate: usage records of glyphosate isopropylamine 38.95%, metsulfuron methyl 20%, triclopyr butoxy ethyl ester 32.1%, acephate 97%, cypermethrin 16%, sodium chlorate 99%, 2,4-D dimethyl amine, 2,4-D dimethyl ammonium 60%, and imazethapyr 70%.   |          |
|       |   | Bahau Estate: usage records of glyphosate isopropylamine 38.95%, metsulfuron methyl 20%, triclopyr butoxy ethyl ester   |          |

|       |   |          | 32.1%, glufosinate ammonium 13.5%, floxypyr methylepthyl ester 29.6%, Imazapyr isopropylamine 11%, propineb 70%, amitraz 21.7%, cypermethrin 16%, flocoumafen 0.005%, monosodium acid methanearsonate (MSMA) 16.6%, carbosulfan 20%, and imazethapyr 70%.   |          |
|-------|---|----------|---|----------|
|       |   | •        | Regent Estate: usage records of glyphosate isopropylamine 38.95%, metsulfuron methyl 20%, triclopyr butoxy ethyl ester 32.1%, floxypyr methylepthyl ester 29.6%, cypermethrin 16%, flocoumafen 0.005%, Brodifacoum 0.003%, Sodium Chlorate 38.5%, monosodium acid methanearsonate (MSMA) 16.6%, Bromodiolone 0.005%, carbosulfan 20%, Indaziflam 45.5%, imazethapyr 70%, 2,4-d dimethyl amine, and 2,4-d dimethyl ammonium 40%. |          |
|       |   | •        | Sagil Estate: usage records of glyphosate isopropylamine 38.95%, metsulfuron methyl 20%, triclopyr butoxy ethyl ester 32.1%, glufosinate ammonium 13.5%, propineb 70%, cypermethrin 16%, flocoumafen 0.005%, chlorpyrifos 38.7%, malathion 57%, Sodium Chlorate 99%, tetrachloroisophtalonitrile (Chlorothalonil) 50%, dimethoate 38%, carbosulfan 5%, Imazethapyr 70%, and fipronil 5%   |          |
| 7.2.3 | (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.  - Critical (Major) compliance - | th<br>m  | s per Integrated pest Management Plan, the visited estates stated on<br>the minimisation of pesticide usage. The plan was monitored by the<br>anagement team. The IPM consist of Planting Beneficial Plant, Rat<br>amage census, and Ganoderma census.  | Complied |
|       |   | pa<br>te | ne estate continues to implement cultural/biological control for the oil alm pest in the plantation such as leaf eating pest and rat. IPM schniques applied at the estate include monitoring of pest numbers and the use of triggers for initiation of control measures.  |          |
|       |   |          | erified through site visit, it was observed that implementation of Barn wl Boxes and planted beneficial plan to minimise usage of pesticide.  |          |

|       |  | Estates had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.  (a) Paraquat usage has been prohibited in all units and the entirety of the organization.  (b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard/SOP  (c) The pesticide reduction program is monitored on usage per hectare basis.  |          |
|-------|--|--|----------|
| 7.2.4 | There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.  - Minor compliance -   | Based on the site visit, records review, and interview with chemical handlers, it verified that there was no prophylactic use of pesticides at the estates.  | Complied |
| 7.2.5 | Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.  The due diligence refers to:  a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. | The Chemical Registers for the mill and sampled estates are readily available for verification and are reviewed annually, as well as when new chemicals are introduced into the operations. The register indicates that all pesticides used fall under classes II, III, and IV. The use of paraquat has been prohibited across all IOI estates.  For the usage of highly toxic or limited pesticides, the estates have obtained permits from the Department of Agriculture. Safety Data Sheets (SDS) are placed in the chemical store for emergency purposes, and an emergency eye wash station is functional within the chemical store.  The estates' usage of pesticides is officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A), and is in accordance with USECHH Regulations 2000. There is no evidence of the use of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions. | Complied |

|       | Minor compliance   | Expent for 2.4 D Dimethylammenium and Cynormathyla which are   |          |
|-------|--|--|----------|
|       | - Minor compliance -   | Except for 2,4-D-Dimethylammonium and Cypermethrin, which are Class II chemicals, all others are of Class III & IV. The use of paraquat has been eliminated in accordance with IOI Group Policy and has been replaced by a contact or systemic herbicide such as Glyphosate Isopropylammonium, Triclopyr-Butotyl, 2,4-D-Dimethylammonium, Indaziflam, Monosodium Methanearsonate (MSMA), Glufosinate Ammonium, Metsulfuron-Methyl, Sodium Chlorate, etc.  From records and interviews with workers, staff, and estate assistants, it can be concluded that training was conducted with all necessary precautions taken and all legal requirements met. |          |
| 7.2.6 | <b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. | Pesticide operators have been provided with comprehensive training regarding the safe usage and health issues related to chemical application. They also attend monthly health surveillance conducted by the Medical Assistant. The training covers the safe handling and application of pesticides, and suitable personal protective equipment (PPE) and application equipment are provided to the operators based on the PPE issuance forms.   | Complied |
|       | - Critical (Major) compliance -  | The training records, reviewed as per Indicator 3.7.2, show that various training sessions have been conducted for pesticide handlers at different estates. For instance:  |          |
|       |  | • Bukit Dinding Estate: Training on Pesticide Application SOP (09/05/2024), Chemical Premix SOP (23/12/2023), and Empty Containers Management SOP (13/05/2024).  |          |
|       |  | • Bahau Estate: Training on SOP Re-Entry (12/01/2024), SOP PPE (20/02/2024), and SOP P&D (11/01/2024).   |          |
|       |  | • Regent Estate: Training on PPE (13/02/2024), Mist blower SOP (18/03/2024), and Rat baiting (19/03/2024).   |          |
|       |  | • Sagil Estate: Training on Chemical Premix SOP (18/04/2024), PPE Training (05/12/2023), and SDS (21/09/2023).   |          |

|       |   | <u>,                                      </u>  |          |
|-------|---|---|----------|
|       |   | Records indicate that pesticides are handled, used, and applied by trained personnel in accordance with the Safety Data Sheets (SDS) of the product. Staff and workers, including storekeepers, sprayers, fertilizer and rat bait workers, have been trained and understand the hazards involved and the safe methods of handling chemicals. The trade and generic names of the chemicals are made known to the workers through the SDS training, and SDS are displayed at all storage areas. The training includes safety aspects and the usage of PPE when handling pesticides.  All workers involved in pesticide application are provided with appropriate PPE, which is replaced when worn out. PPE issuance and replacement records have been verified. Interviews conducted with workers, staff, and store clerks confirm that they have been trained and are aware of safe handling procedures. |          |
| 7.2.7 | (C) Storage of all pesticides is in accordance with recognised best practices Critical (Major) compliance - | The Unit of Certification (UoC) has adopted the procedure established by IOI, namely the Safe Work Procedure – Storage and Management of Chemical Stores (Doc. Ref. IOI-OSH 3.2.2, Rev. No. 05, Appendix 6(8-A), dated 06-Jan-2020). As evidenced by the training records maintained by each operating unit, it is verified that the training related to the procedure was conducted accordingly by the respective operating units. The latest training sessions were conducted as follows:  Bukit Dinding Estate: 16/05/2024  Bahau Estate: 20/02/2024  Regent Estate: 27/03/2024  | Complied |
|       |   | Pesticides were found to be stored in the mill and all estate's Chemical Stores in accordance with the Occupational Safety and Health Act 1994  |          |

|       |  | (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were locked at all times, and during the site visit, the storekeeper was observed unlocking the padlock to open the entrance door for the auditor to inspect the store. Signage requiring the donning of Personal Protective Equipment (PPE) was visibly posted at the entrance door. The Chemical Store signage with the required Hazard Symbols was available at the entrance. The facility's ventilation fan was found to be operational, providing adequate ventilation. An up-to-date chemical register, trade and generic names, and their Safety Data Sheets were available. |          |
|-------|--|---|----------|
| 7.2.8 | All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.  - Minor compliance - | The Standard Operating Procedure (SOP) <i>Pengendalian Bekas Kosong</i> , dated 01/08/2012, provides guidelines for the triple rinsing and puncturing of empty chemical containers. These containers are collected at designated places and disposed of through responsible contractors. Used chemical containers are either reused as containers for spraying solution or disposed of as recycled waste.   | Complied |
|       |  | For disposal, empty pesticide containers are triple rinsed and pierced at the bottom, then stored in the empty container store. At each estate of the Unit of Certification (UoC), records on the disposal and recycling of chemical containers and fertiliser bags are maintained and were available during the audit. Records on the usage and disposal were well recorded and documented.  |          |
|       |  | These containers are disposed of as scheduled waste SW 409. The latest records of disposal are as follows:  |          |
|       |  | Bukit Dinding Estate: The latest disposal was on 18/03/2024 via a Department of Environment (DOE)-approved SW disposal contractor. Consignment No. 2024031810PMERW9 was sighted.  |          |
|       |  | <ul> <li>Bahau Estate: The latest disposal was on 07/03/2024 via a DOE-<br/>approved SW disposal contractor. Consignment No.<br/>20240307121RKMF was sighted.</li> </ul>  |          |

|        |  | <ul> <li>Regent Estate: The latest disposal was on 18/03/2024 via a DOE-approved SW disposal contractor. Consignment No. 2024031808XCEBVG was sighted.</li> <li>Sagil Estate: The latest disposal was on 23/05/2024 via a DOE-approved SW disposal contractor. Consignment No. 2024052313IAB3N2 was sighted.</li> </ul>   |          |
|--------|--|---|----------|
| 7.2.9  | (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.  - Critical (Major) compliance - | The policy of IOI Group was not to carry out any aerial application of pesticides. Based on documentation reviews (chemical usage records, chemical register, justification of pesticides, chemical bin cards, chemical stock purchase), site visits, and interview with relevant personnel (storekeeper, workers, etc.), it was noted that each estate of the UoC had not practicing the aerial spraying. Therefore, this policy has been found to be adhered at the UoC.  | Complied |
| 7.2.10 | (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.  - Critical (Major) compliance -  | <ul> <li>All workers exposed to chemical hazards have undergone a medical surveillance programme, as recommended in the Chemical Health Risk Assessment (CHRA) and stipulated in the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. The latest Medical Surveillance is as follows:</li> <li>Bukit Dinding Estate: Conducted by HQ/19/DOC/00/00366 on 23/01/2024 for 11 workers. Based on the report dated 20/02/2024, all were fit to work. The results were briefed to each tested worker on 05/04/2024 by the Health Assistant (HA).</li> <li>Bahau Estate: Conducted by HQ/11/DOC/00/00215 on 14/09/2023 for 9 workers. Based on the report dated 27/10/2023, all were fit to work. The results were briefed to each tested worker on</li> </ul> | Complied |
|        |  | 27/10/2023 by the HA. Another surveillance was conducted by HQ/11/DOC/00/00215 on 16/01/2024 for 10 workers. Based on the report dated 18/03/2024, all were fit to work. The results were briefed to each tested worker on 20/03/2024 by the HA.  |          |



|        |   | <ul> <li>Regent Estate: Conducted by HQ/08/DOC/00/545 in March 2024 for 28 workers. Based on the report dated 12/04/2024, all were fit to work. The results were briefed to each tested worker on 18/04/2024 by the HA.</li> <li>Sagil Estate: Conducted by HQ/11/DOC/00/545 from 10/11/2023 to 22/12/2023 for 20 workers. Based on the report dated 03/01/2024, all were fit to work. The results were briefed to each tested worker on 03/01/2024 by the HA. Another surveillance was conducted by HQ/11/DOC/00/545 on 14/02/2024 for 20 workers. Based on the report dated 20/03/2024, all were fit to work. The results were briefed to each tested worker on 28/03/2024 by the HA.</li> </ul>   |          |
|--------|---|--|----------|
|        |   | No abnormalities were reported by the Occupational Health Doctor (OHD). The medical reports showed that there was no case of low blood cholinesterase levels. Any worker with such a health condition would be declared as unfit for work with pesticides. No such cases in the UoC as at the date of the audit. In addition to the annual medical surveillance, monthly clinical checks (gastrointestinal, urinary system, pregnancy) are also carried out by the Medical Health Officer/Assistant on the chemical handlers. Medical surveillance records and monthly health checking records (done at the clinics) were available and satisfactorily maintained. Chemical handlers were interviewed during field visits and feedback received that they did not have any symptoms of toxic reactions such as skin disorders, rashes, mouth, and throat pain, breathing difficulties or nail problems. This demonstrates the commitment to ensuring the health and safety of all workers. |          |
| 7.2.11 | <b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other | Gomali POM UoC are bound by IOI's Guidelines on Reproductive Health (Doc Ref: IOI/G/SE/ 002 dated 05-Oct-2020) states:   | Complied |



people that have medical restrictions and they are offered alternative equivalent work.

- Critical (Major) compliance -

- Paragraph 4.1.2 of the Guidelines states that the Estate's Health Assistants (EHA) are to carry out urine pregnancy test at 3 months interval for general workers, and at monthly intervals for chemical handlers, upon workers' consent.
- Paragraph 4.1.3 of the Guidelines states that the management shall reassign the pregnant workers with tasks which are appropriate for pregnant women.

Mill and every estate have their worker list and stated the type of work clearly. Verified from records, on-site field inspections and interviews that all chemical handlers are male.

For the people that have medical restrictions, the UoC is complying with the Part X (Medical Removal Protection) – Regulation 28. Medical removal protection of Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000, which states:

- (1) The employer shall not permit an employee to be engaged in and shall remove him from any work that exposes or likely to expose him to chemicals hazardous to health on each occasion that the medical finding, determination or opinion expressed by an occupational safety and health officer who is also a medical practitioner or by an occupational health doctor shows that the employee has a detected medical condition which places him at increased risk of material impairment to health from exposure to chemicals hazardous to health.
- (2) The employer, after being notified by an occupational safety and health officer who is also a medical practitioner or an occupational health doctor of the fact, shall not permit a pregnant employee or breastfeeding employee to be engaged in, and shall

| <b>Criteri</b> 7.3.1 | on 7.3: Waste is reduced, recycled, reused and disposed of in an A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. | environmentally and socially responsible manner.  Addressed in the Environment Impact Assessment (EIA) Management Action Plan and Continuous Improvement Plan dated 08/03/2024, Identification and management plan of waste product Waste   | Non-<br>compliance |
|----------------------|---|---|--------------------|
|                      |   | However, based on the latest results from medical surveillance, it has been determined that all employees are fit to work. Therefore, the OHD has not made any recommendations for "Medical Removal" based on the current assessments.  |                    |
|                      |   | Following the guidance outlined in the CHRA report, employees involved in tasks related to chemicals are required to undergo annual medical surveillance. If there a case where a worker indicates he/she is "Not Fit To Work," the OHD will then suggest "Medical Removal" for that particular individual. |                    |
|                      |   | (4) For the purpose of this regulation, "medical practitioner" means a medical practitioner registered under the Medical Act 1971 [Act 50].   |                    |
|                      |   | <ul><li>(b) for an employee removed in accordance with sub regulation</li><li>(2), at the appropriate time where the employee is no longer pregnant or breastfeeding a child.</li></ul>   |                    |
|                      |   | <ul> <li>(a) for an employee removed in accordance with sub regulation         <ul> <li>(1), when a subsequent medical determination results in a medical finding, determination or opinion which shows that the employee no longer has the detected medical condition; or</li> </ul> </li> </ul>           |                    |
|                      |   | (3) The employer shall return an employee to his former job -   |                    |
|                      |   | remove the employee from work which may expose or is likely to expose the employee to chemicals hazardous to health.  |                    |

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

| Minay compiliance    | Cab c 4.1- 14/-     | eta and Fuent Chamical Cantainan  |
|----------------------|---------------------|---|
| - Minor compliance - |                     | ste and Empty Chemical Container  |
|                      | Clinical Waste      |   |
|                      |                     | d Recycle Waste, Sewage and Garden Residue  |
|                      | Scrap Iron          |   |
|                      |                     | il Mill and supply bases has established Waste<br>in 2024. Among details in the management plan<br>hable below: |
|                      | Waste<br>Generation | Action Plan   |
|                      | Scheduled           | Comply with Schedule waste regulation   |
|                      | waste               | Update inventory of SW in E-Swiss on monthly basis  |
|                      |                     | To make sure the schedule waste store is locked and secured   |
|                      |                     | 4. All liquid SW to be stored inside the closed container and place in SW store.                                |
|                      | Industrial<br>waste | Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals              |
|                      |                     | Ensure the contractor to dispose the debris after work completion   |
|                      | Domestic waste      | Regular inspection by estate management personnel to housing area   |
|                      |                     | Beautification of the housing area by planting flowers and beneficial plant                                     |
|                      |                     | 3. Gotong royong to conducted regularly   |

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|       |  | Operational waste  | 4. So spraying of vegetation along to the road side to allow natural vegetation  1. Fertilizer bag re used for loose fruit collection or return to supplier   |          |
|-------|--|--|---|----------|
|       |  |  | Old tyres used for landscaping or return to supplier  |          |
|       |  | The implementati monthly basis.  | on was monitored by the management units on   |          |
|       |  | Sinar YSM Enterpr<br>that the contract<br>Management De                          | of Bukit Dinding and Bahau Estate has appointed the ise to collect the domestic waste for disposal. Verified or has the license from the National Solid Waste partment with license no: JPSPN/NS0105823-expiry date: 07/11/2025.  |          |
|       |  |  | ontractor was appointed to handle the disposal of ontractors' information as below:   |          |
|       |  | During the site v<br>Estate, multiple pi<br>found on the floor<br>Waste Manageme | shd – License No: 003319 – Expiry date: 30/04/2025 isit to the scheduled waste area at Bukit Dinding eces of scrap metal with oil and grease stains were a contaminating the land. This is not in line with the nt Plan , which states that the negative impact of line spent oil causes pollution to sail drains and |          |
|       |  | natural watercour  | ling spent oil causes pollution to soil, drains, and ses. The plan requires secondary containment for all ils. Therefore, a Non-Conformance has been raised.  |          |
| 7.3.2 | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.  - Minor compliance - | Environment Impa<br>Continuous Impro   | dule waste management has been established. Reference Assessment (EIA) Management Action Plan and exement Plan dated 06/11/2023, Identification and of waste product.   | Complied |



Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes In Malaysia.

Awareness training on Schedule waste has been conducted as per date below:

Bahau Estate: 23/01/2024Regent Estate: 15/03/2024Gomali Palm Oil Mill: 09/02/2024

• Sagil Estate: 22/04/2024

Generally, the workers have demonstrated good understanding in proper disposal of wastes.

Records of Schedule Waste Disposal were verified, the detail of the disposal is as the following:

| 5        |       |            |             |       |       |  |  |
|----------|-------|------------|-------------|-------|-------|--|--|
|          |       | Gomali Pa  | lm Oil Mill |       |       |  |  |
| Date     | SW109 | SW110      | SW305       | SW306 | SW312 |  |  |
| 15/05/24 | 0.151 | 0.520      | 2.268       | 0.887 | -     |  |  |
|          | SW409 | SW410      | SW429       | SW104 | SW312 |  |  |
|          | 0.429 | 0.458      | 0.055       | 0.002 | -     |  |  |
| Date     | SW109 | SW110      | SW305       | SW306 | SW312 |  |  |
| 11/01/24 | 0.169 | 0.120      | 3.649       | 0.965 | -     |  |  |
|          | SW409 | SW410      | SW429       | SW104 | SW312 |  |  |
|          | 0.259 | 0.645      | 0.271       | 0.022 | 0.04- |  |  |
|          |       | Bukit Dind | ling Estate |       |       |  |  |
| Date     | SW110 | SW102      | SW305       | SW410 | SW104 |  |  |

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|       | •        |      |         |        |       |       |
|-------|----------|------|---------|--------|-------|-------|
| 18/09 | 0.09/23  | .016 | 0.121   | 0.216  | 0.297 | 0.002 |
|       | SW       | N409 | SW408   |        |       |       |
|       | 0.       | .230 | -       |        |       |       |
| 25/03 | )3/23 SW | W110 | SW102   | SW305  | SW410 | SW104 |
|       | 0.       | .003 | 0.118   | 0.199  | 0.191 | 0.001 |
|       | SW       | N409 | SW408   |        |       |       |
|       | 0.       | .119 | 0.029-  |        |       |       |
| 12/03 | )3/24 SW | W110 | SW102   | SW305  | SW410 | SW104 |
|       | 0.       | .002 | 0.265   | 0.260  | 0.049 | 0.002 |
|       | SW       | N409 | SW408   |        |       |       |
|       | 0.       | .142 | 0.002   |        |       |       |
|       | ·        |      | Bahau   | Estate |       |       |
| Date  | e SW     | W110 | SW102   | SW305  | SW410 | SW104 |
| 07/03 | 03/24 0. | .013 | 0.020   | 0.260  | 0.049 | 0.002 |
|       | SW       | N409 | SW312   |        |       |       |
|       | 0.       | .453 | 0.0.325 |        |       |       |
| 16/11 | 1/23 SW  | W110 | SW102   | SW305  | SW410 | SW104 |
|       | 0.       | .025 | -       | 0.209  | 0.052 | 0.004 |
|       | SW       | N409 | SW312   |        |       |       |
|       | 0.       | .287 | 0.032   |        |       |       |



|       |  |          |             | Regent | Estate |       |                                   |  |
|-------|--|----------|-------------|--------|--------|-------|-----------------------------------|--|
|       |  | Date     | SW110       | SW102  | SW305  | SW410 | SW104                             |  |
|       |  | 18/03/24 | 0.003       | 0.001  | 0.145  | 0.218 | 0.04                              |  |
|       |  |          | SW409       | SW312  |        |       |                                   |  |
|       |  |          | 0.267       | 0.001  |        |       |                                   |  |
|       |  | 20/11/23 | SW110       | SW102  | SW305  | SW410 | SW104                             |  |
|       |  |          | -           | -      | 0.106  | 0.227 | -                                 |  |
|       |  |          | SW409       | SW312  |        |       |                                   |  |
|       |  |          | 0.314       | 0.001  |        |       |                                   |  |
|       |  |          |             | Sagil  | Estate |       |                                   |  |
|       |  | Date     | SW410       | SW104  | SW409  | SW408 | SW305                             |  |
|       |  | 23/05/24 | 0.475       | 0.0005 | 2.00   | 0.02  | 0.84                              |  |
|       |  |          | SW312       | SW404  | SW110  |       |                                   |  |
|       |  |          | 0.13        | 0.0009 | 0.18   |       |                                   |  |
|       |  |          |             |        |        |       |                                   |  |
| 7.3.3 | The unit of certification does not use open fire for waste disposal.  - Minor compliance - |          | as disposed |        |        |       | estate visited<br>llector through |  |

| 7.4.1 | Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.  - Minor compliance - | The estates and mill continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established Standard Operating Procedure, guidelines and policies | Complied |
|-------|---|--|----------|
|       |   | a) Safety Standard Operating Procedures (SOP) dated 01/08/2012 ref IOI/OSH 3.3.2 - Manuring  |          |
|       |   | b) Agrochemical Management Guidelines 28/8/20 ref IOI/GG/SE/102  |          |
|       |   | c) Sustainability Palm Oil Policy dated Oct 2020 signed by Group Managing Director / CEO   |          |
|       |   | d) Environmental Management Guidelines ref IOI/G/EO/006 dated 28/8/20  |          |
|       |   | All the estates operations were guided through the manuals and SOP and followed to manage soil fertility to optimise yield and minimise environmental impacts.   |          |
|       |   | SOP on managing soil fertility for optimize yield and minimize environmental impacts has been established. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents.  |          |
|       |   | 1. Standard Operating Procedure for Leguminous Cover Plant Manuring, document no. IOI/SOP/A/08, issue date 2007, revised date March 2020   |          |
|       |   | <ol> <li>Standard Operating Procedure for Manual Fertiliser Application<br/>for Immature and Mature Palms, document no. IOI/SOP/A/09,<br/>issue date 2007, revised date March 2020</li> </ol>  |          |

|       |   | <ol> <li>Standard Operating Procedure for wheelbarrow Fertiliser Application for Immature and Mature Palms, document no. IOI/SOP/A/10, issue date 2007, revised date March 2020</li> <li>Standard Operating Procedure for Buffalo Assisted manuring (BAM) for Immature and Mature Palms, document no. IOI/SOP/A/11, issue date 2007, revised date March 2020</li> <li>Standard Operating Procedure for Semi mechanised Manuring for</li> </ol>  |          |
|-------|---|---|----------|
|       |   | Mature Palms, document no. IOI/SOP/A/12, issue date 2007, revised date March 2020   |          |
|       |   | <ol> <li>Standard Operating Procedure for Empty Fruit Bunch (EFB)         Mulching, document no. IOI/SOP/A/13 issue date 2007, revised         date March 2020</li> </ol>   |          |
| 7.4.2 | Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.  - Minor compliance - | Periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For all the estates agronomic assessment and fertiliser recommendation was conducted by IOI Research Centre - Agronomist 2023/24 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried out in all estates. Soil analysis for pH, Org C, Total N, Total P, Avail P, exch K, exch Ca & exch Mg was carried out on a 5-year cycle basis and recent carried out as follows:  Bukit Dinding Estate: Latest conducted the Soil and Leaf Nutrient Analysis in Nov 2023.  Bahau Estate: Latest conducted the Soil and Leaf Nutrient Analysis in Jun 2023. | Complied |

|       |  | <ul> <li>Regent Estate: Latest conducted the Soil and Leaf Nutrient Analysis in Sept 2023.</li> <li>Sagil Estate: Latest conducted the Soil and Leaf Nutrient Analysis in Jan 2023.</li> <li>Foliar and soil sampling was carried out by the IOI Research Centre prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms.</li> </ul>             |          |
|-------|--|---|----------|
| 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 - | All the estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied EFB at 20-40 tons/ha and records showed that EFB mt in 2023/24 was as follows. | Complied |
|       |  | Bukit Dinding Estate: EFB Programme 2024 – only 34.19 MT applied in Jan 2024, no application after that until audit conducted – due to  |          |
|       |  | <ul> <li>Bahau Estate:</li> <li>Total of 245.18 MT was applied in 2023. No application in 2024 so far.</li> </ul>   |          |
|       |  | <ul> <li>Regent Estate: applied 264.05 MT in 2024 so far and 1,186.97 MT in 2023</li> </ul>   |          |
|       |  | Sagil Estate: No application  |          |

|       |  | recycle program. Reviewer follows:  The following practices are nutrient recycling strategy.  1. EFB application in design per palm applied in interest and applied in interest.  2. For mature planting, 1 conducted along the interest and iscompose.  The cut frond are standiscompose.  The estate has established FY 2023 - 2024. EFB recompose. | re applied in the estates in relation to a gnated fields at dosage of 250-300 kg of the errows for immature planting mt EFB for every 4 palms with application the row near frond stacks. The acked in between the palm's rows left of the acked in be | the EFB on is to gram |          |
|-------|--|---|--|-----------------------|----------|
| 7.4.4 | Records of fertiliser inputs are maintained Minor compliance - | others as described below: b) program sheets, bin ca  | ards<br>er application monitoring forms, etc.  | nong                  | Complied |

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|          |   | Records of programs and applicauditors. Review of the record applied in 2023/2024 was in lifertilizers were applied in the est by the Agronomist:  (1) Bukit Dinding Estate: AC, RP (2) Bahau Estate: AS, RP, MOP, (3) Regent Estate: RP, GML, Kie MOP, Foliar Fertilizer.  (4) Sagil Estate: AS, Compound Mixture, Bio CPD, Compact 4  The fertiliser application was congronomist base on foliar sampling records were available at the est | s revealed that ne with the potates subject to the NK Mixture, NK Mixture, NK Serite, Compound 45, Kieserite, Sonducted as page conducted. | at the actual fertilizer ogram. The follows to the recommendation of the recommendation of the fertilizer application of the fertilizer application of the fertilizer application. | ers ing ion te e ate, NK |          |
|----------|---|---|--|--|--------------------------|----------|
| Criterio | on 7.5: Practices minimise and control erosion and degradation of   | of soils.   |  |  |                          |          |
| 7.5.1    | (C) Maps identifying marginal and fragile soils, including steep terrain, are available Critical (Major) compliance - | Description of the soil characterist parent material and key aspect. The soil series in the estates were  | for managemere classified as   | ent was also availat<br>follows:   |                          | Complied |
|          |   | Soil Type   | Area (Ha.)   | Percentage (%)   |                          |          |
|          |   | Bukit Din   | ding Estate  |  |                          |          |
|          |   | Batu Anam  Durian   | 424.87   | 25.48  |                          |          |
|          |   | Bungor  Durian  | 488.76   | 29.31  |                          |          |
|          | 1   |   |  | i  | i I                      |          |

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|              | T                   | Ī        | 1     |
|--------------|---------------------|----------|-------|
| Telemong     | AKoB/Local Alluvium | 397.17   | 23.82 |
|              | Bahau               | Estate   |       |
| Batu Anam    |                     | 35.28    | 1.23  |
| Bungor       |                     | 601.08   | 20.88 |
| Colluvium    |                     | 307.14   | 10.67 |
| Laterite     |                     | 32.82    | 1.14  |
| Local Alluvi | um                  | 452.20   | 15.71 |
| Malacca      |                     | 273.31   | 9.49  |
| Marang       |                     | 1,166.64 | 40.52 |
| Munchong     |                     | 10.69    | 0.37  |
|              | Regent              | Estate   |       |
| Batang Mel   | rbau                | 584.95   | 25.16 |
| Batu Lapan   | 1                   | 239.78   | 10.31 |
| Bungor       |                     | 174.43   | 7.50  |
| Chat         |                     | 161.56   | 6.95  |
| Gajah Mati   |                     | 26.92    | 1.16  |
| Holyrood     |                     | 31.72    | 1.36  |
| Jitra        |                     | 48.55    | 2.09  |
| Kerayong     |                     | 69.70    | 3.00  |
| Lubok Kiat   |                     | 157.43   | 6.77  |



| Malacca        | 186.92       | 8.04  |  |
|----------------|--------------|-------|--|
| Medang         | 62.95        | 2.71  |  |
| Padang Besar   | 178.65       | 7.68  |  |
| Renggam        | 140.81       | 6.06  |  |
| Tawar          | 51.93        | 2.23  |  |
| Tebok          | 67.08        | 2.88  |  |
| Terap          | 141.98       | 6.11  |  |
|                | Sagil Estate |       |  |
| Bukit Temiang  | 18.54        | 0.73  |  |
| Bungor         | 229.17       | 8.98  |  |
| Colluvium      | 923.27       | 36.18 |  |
| Kekura         | 106.88       | 4.19  |  |
| Local Alluvium | 318.98       | 12.50 |  |
| Malacca        | 122.24       | 4.79  |  |
| Munchong       | 394.58       | 15.46 |  |
| N/A            | 39.00        | 1.53  |  |
| Organic Clay   | 0.46         | 0.02  |  |
| Pelepah        | 53.60        | 2.10  |  |
| Prang          | 37.87        | 1.48  |  |
| Rengam         | 307.49       | 12.05 |  |

|       | N   |  | 0 !: !   |
|-------|---|--|----------|
| 7.5.2 | No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of | Like all IOI estates, the estates visited in the UoC continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:   | Complied |
|       | Certification Minor compliance -  | a) Sustainability Palm Oil Policy dated Oct 2020 signed by Group Managing Director / CEO   |          |
|       |   | b) SOP - Ref no. IOI/SOP/A/05 Land preparation for replanting Mac 2020   |          |
|       |   | c) SOP - Ref no IOI/SOP/A/04 Land clearing for oil palm cultivation Mac 2020   |          |
|       |   | It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in various mature areas. The cover crops, i.e., <i>Pueraria javanica, Calopogonium mucunoides,</i> and <i>Calopogonium caeruleum</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit. |          |
|       |   | IOI Plantations has established Standard Operating Procedures (SOP) for estate operations related to new planting and replanting land preparation. These SOPs include:   |          |
|       |   | Standard Operating Procedure for Land Clearing for Oil Palm Cultivation, document no. IOI/SOP/A/04, issued in 2007, revised in March 2020.   |          |



Standard Operating Procedure for Land Preparation for New Planting and Replanting, document no. IOI/SOP/A/05, issued in 2007, revised in March 2020.

According to the SOPs, under section 6.5 concerning Hilly to Steep Terrain ( $\leq$  25° Slope), it is stated that no planting or terracing shall be carried out on steep terrains ( $\geq$ 25°). The GIS Department has established a slope map indicating the percentage of different slope categories for each estate:

#### Bahau Estate:

- Flat (0° 2°): 31.86%
- Undulation (2° 6°): 57.12%
- Rolling (6° 12°): 10.58%
- Hilly (12° 15°): 0.39%
- Steep (15° 25°): 0.03%
- Very Steep (≥ 25°): 0.00%

#### Regent Estate:

- Flat (0° 2°): 30.06%
- Undulation (2° 6°): 46.78%
- Rolling (6° 12°): 18.03%
- Hilly (12° 15°): 2.29%
- Steep (15° 25°): 2.54%
- Very Steep (≥ 25°): 0.30%

#### Gomali Estate:

| 7.5.3 | There is no new planting of oil palm on steep terrain.  - Minor compliance -   | <ul> <li>Flat (0° - 2°): 42.16%</li> <li>Undulation (2° - 6°): 45.67%</li> <li>Rolling (6° - 12°): 11.91%</li> <li>Hilly (12° - 15°): 0.25%</li> <li>Steep (15° - 25°): 0.01%</li> <li>Very Steep (≥ 25°): 0.00%</li> <li>The "Slope and River Protection" document, signed by the CEO in January 2015, states among other things "Slopes of greater than 25 degrees are to be excluded from any new plantation development and replanting program. For slopes of less than 25 degrees, the existing crop and all vegetation shall be maintained accordingly.""</li> <li>However, based on the site visit, documentation review, interviews with stakeholders (neighbouring estates, and stakeholders that are adjacent to the estate), and desktop studies, it is verified that there is no establishment of new plantings at each estate of the Gomali POM UoC.</li> <li>Verified through document checking, interview and site verification found there is no new planting or replanting activities on steep terrain.</li> </ul> | Complied        |
|-------|--|---|-----------------|
|       | <b>on 7.6:</b> Soil surveys and topographic information are used for sited operations.   | e planning in the establishment of new plantings, and the results are inc   | corporated into |
| 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 - | Based on the site visit, documentation review, interviews with stakeholders (neighbouring estates, and stakeholders that are adjacent to the estate), and desktop studies, it is verified that there is no establishment of new plantings at each estate of the Gomali POM UoC. However, soil surveys have been conducted and the results are available in a soil map for the respective audited estates. Topographic   | Complied        |

|       |  | contour maps are also available. Both maps are used to manage the drainage and road works in the respective estates.  Soil surveys have been conducted, and the results are presented in a   |          |
|-------|--|--|----------|
|       |  | soil map available at the estates. Additionally, topographic contour maps are accessible, and both the soil map and contour maps are utilized to oversee drainage and road-related activities in the estates. During visits to the estates, slope maps and relevant information were also made available for review. These maps and information contribute to effective management practices in handling drainage and roadwork within the estates. |          |
|       |  | Sample of the soil survey conducted is as the following:   |          |
|       |  | Regent Estate – Batang merbau, Batu Lapan, Bungor, Chat, Gajah<br>Mati, Holyrood, Jitra, Kerayong, Lubok Kiat, Malacca, Medang,<br>Padadang Besar, Renggam, Tawar, Tebok, Terap.   |          |
| 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 - | Based on the site visit, documentation review, interviews with stakeholders (neighbouring estates, and stakeholders that are adjacent to the estate), and desktop studies, it is verified that there is no establishment of new plantings at each estate of the Gomali POM UoC. In addition, it is confirmed that there is no peat soil or soil categorized  | Complied |
|       |  | as marginal or fragile in all estates sampled (refer to Indicator 7.5.1 for more info).  |          |

| 7.6.3    | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.  - Minor compliance -    | Based on the site visit, documentation review, interviews with stakeholders (neighbouring estates, and stakeholders that are adjacent to the estate), and desktop studies, it is verified that there is no establishment of new plantings at each estate of the Gomali POM UoC. However, soil surveys have been conducted and the results are available in a soil map for the respective audited estates. Topographic contour maps are also available. Both maps are used to manage the drainage and road works in the respective estates. | Complied          |
|----------|--|--|-------------------|
|          |  | Soil surveys have been conducted, and the results are presented in a soil map available at the estates. Additionally, topographic contour maps are accessible, and both the soil map and contour maps are utilized to oversee drainage and road-related activities in the estates. During visits to the estates, slope maps and relevant information were also made available for review. These maps and information contribute to effective management practices in handling drainage and roadwork within the estates.                    |                   |
| Criterio | on 7.7: No new planting on peat, regardless of depth after 15 No   | ovember 2018 and all peatlands are managed responsibly.  |                   |
| 7.7.1    | (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas Critical (Major) compliance -      | There is no new planting at sample estates. There is no peat soil identified at estate visited in Gomali Palm Oil Mill and Supply Bases. Verification through site visit, document checking, and interview as well as from Global Forest Watch website confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.   | Not<br>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: | There is no new planting at sample estates. There is no peat soil identified at estate visited in Gomali Palm Oil Mill and Supply Bases. Verification through site visit, document checking, and interview as well as from Global Forest Watch website confirmed that there is no new  | Not<br>Applicable |



|       | 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 -  | planting activity in the estate visited. Hence, the criterion is not applicable.   |                   |
|-------|---|--|-------------------|
| 7.7.3 | (C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -   | There is no new planting at sample estates. There is no peat soil identified at estate visited in Gomali Palm Oil Mill and Supply Bases. Verification through site visit, document checking, and interview as well as from Global Forest Watch website confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable. | Not<br>Applicable |
| 7.7.4 | (C) A documented water and ground cover management programme is in place Critical (Major) compliance -  | There is no new planting at sample estates. There is no peat soil identified at estate visited in Gomali Palm Oil Mill and Supply Bases. Verification through site visit, document checking, and interview as well as from Global Forest Watch website confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable. | Not<br>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.  This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. | There is no new planting at sample estates. There is no peat soil identified at estate visited in Gomali Palm Oil Mill and Supply Bases. Verification through site visit, document checking, and interview as well as from Global Forest Watch website confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable. | Not<br>Applicable |

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| 7.7.6    | Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.  - Critical (Major) compliance -  (C) All existing plantings on peat are managed according to   | There is no new planting at sample estates. There is no peat soil  | Not               |
|----------|--|--|-------------------|
|          | the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.  - Critical (Major) compliance -  | identified at estate visited in Gomali Palm Oil Mill and Supply Bases. Verification through site visit, document checking, and interview as well as from Global Forest Watch website confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.   | 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 (2019) and associated audit guidance.  - Critical (Major) compliance - | There is no new planting at sample estates. There is no peat soil identified at estate visited in Gomali Palm Oil Mill and Supply Bases. Verification through site visit, document checking, and interview as well as from Global Forest Watch website confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable. | Not<br>Applicable |
| Criterio | on 7.8: Practices maintain the quality and availability of surface a   | and groundwater.   |                   |
| 7.8.1    | A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:   | The certification unit has established water management plan for the year 2024. Each estate has established specific wate management plan.   | Complied          |
|          | <ul><li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li><li>b) Workers have adequate access to clean water.</li></ul>  | Bahau Estate The water management plan dated 19/05/2024 has details the  1. Water resource management - Catchment pond at block PM06J  |                   |

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| 1inor compliance - | 2. | Water for do  | mestic ι | ise and   | streams  |           |           |         |
|--------------------|----|---|----------|-----------|----------|-----------|-----------|---------|
|                    | 3. | Drinking wat (SAINS)  | er is su | pplied fr | om Sya   | rikat Air | Negeri Se | embilan |
|                    | 4. | The water conducted or  |          |           |          |           |           | s been  |
|                    |    | Parameter   | S1       | S2        | S3       | S4        | S5        |         |
|                    |    | DO  | 3.86     | 4.61      | 4.64     | 5.41      | 4.54      |         |
|                    |    | BOD   | 3        | 4         | 3        | 4         | 3         |         |
|                    |    | COD   | 27       | 31        | 31       | 38        | 31        |         |
|                    |    | NH3N  | 0.8      | 0.8       | 0.7      | 0.9       | 0.8       |         |
|                    |    | SS  | 26       | 30        | 26       | 30        | 30        |         |
|                    |    | pН  | 7.2      | 7.0       | 6.9      | 6.8       | 6.7       |         |
|                    | 1. | Water manag<br>Dinding Estate<br>Water resour<br>Tube well wa | ce man   | agement   | t – Tube |           | ns        |         |
|                    | -  | Drinking wat<br>water specifi                                 | er test  | conducte  | ed on 18 | 3/12/202  | 3 shows t |         |
|                    |    | Parameter   |          | Result    |          | Limit     |           |         |
|                    |    | -LI   |          | 8.51      |          | 6.5-9     | 0         |         |
|                    |    | pН  |          | 0.51      |          | 0.5-9.    | 0         |         |

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|          | Total Coliform                      | 0                           | 0                        |                             |      |
|----------|-------------------------------------|-----------------------------|--------------------------|-----------------------------|------|
|          |                                     |                             |                          |                             |      |
|          | e-Coli                              | 0                           | Nil                      |                             | -    |
|          | Hardness                            | 10.7                        | 500                      |                             |      |
| 3.       | The water stream conducted on 03/10 | upstream<br>0/2023 with t   | and dowr<br>the result a | stream has<br>s following:  | been |
|          | Parameter                           | S1                          | S2                       | S3                          |      |
|          | DO                                  | 5.49                        | 5.76                     | 5.60                        |      |
|          | BOD                                 | 4                           | 5                        | 5                           |      |
|          | COD                                 | 38                          | 46                       | 46                          |      |
|          | NH3N                                | 1.10                        | 0.80                     | 0.80                        |      |
|          | SS                                  | 8                           | 26                       | 12                          |      |
|          | pH                                  | 6.1                         | 6.0                      | 6.0                         |      |
| 4.       | Water manageme                      | nt plans at e               | estate                   |                             |      |
| Regent E | Estate                              |                             |                          |                             |      |
| 1.       | The water strean conducted on 27/01 | n upstream<br>L/2024 with t | and dowr<br>the result a | nstream has<br>s following: | been |
|          | Parameter                           | S1                          | S2                       | S3                          |      |
|          | DO                                  | 6.21                        | 5.44                     | 5.07                        |      |
|          | BOD                                 | 4                           | 2                        | 2                           |      |

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|                |  | 1                             | 1                           | 1             |         |  |
|----------------|--|-------------------------------|-----------------------------|---------------|---------|--|
|                | COD  | 38                            | 19                          | 23            |         |  |
|                | NH3N   | 0.80                          | 0.65                        | 0.50          |         |  |
|                | SS   | 30                            | 6                           | 24            |         |  |
|                | рН   | 6                             | 6.3                         | 6.5           |         |  |
| Th<br>al<br>sa | agil Estate he water stream upstrea Il 3 streams along the estample test for each strea utlet of each stream is t    | state. The ma<br>am conducted | anagement h<br>d on 08/08/2 | nas conducted | d three |  |
|                | Parameter  | SA                            | SB                          | SC            | ]       |  |
|                | DO   | 6.74                          | 6.79                        | 7.08          | 1       |  |
|                | BOD  | 2                             | 3                           | 3             | -       |  |
|                | COD  | 16                            | 31                          | 31            | -       |  |
|                | NH3N   | 0.50                          | 0.80                        | 0.8           |         |  |
|                | SS   | 4                             | 4                           | 34            |         |  |
|                | рН   | 5.8                           | 5.7                         | 5.9           |         |  |
|                | Drinking water test conducted on 20/02/2024 shows that the water specification met with the drinking water standard. |                               |                             |               |         |  |
|                | Parameter  | Result                        | Lim                         | nit           |         |  |



|   | pН                               | 8.1  | 6.5-9.0 |  |  |  |  |  |
|---|----------------------------------|------|---------|--|--|--|--|--|
|   | Turbidity                        | 0.10 | 5.00    |  |  |  |  |  |
|   | Total Coliform                   | 0    | 0       |  |  |  |  |  |
|   | e-Coli                           | 0    | Nil     |  |  |  |  |  |
|   | Hardness                         | 8.8  | 500     |  |  |  |  |  |
|   |                                  |      |         |  |  |  |  |  |
| ١ | Water management plans at estate |      |         |  |  |  |  |  |

1.

The water management plan verified at each estate is as the following:

| Objective   | Action Plan  |
|---|--|
| To monitor quality of main water inlet/outlet for pollutants from estate operations | Water analysis results by R&D  |
| Contingency during water shortage   | Purchasing water from JBA  |
| Contingency during water shortage   | Establish drain blocking system in field to conserve water, to maintain the available water catchment pond in the estate |
| To monitor the usage of fresh water in monthly basis                                | Awareness to workers on water consumption  |
| Stream water in Bahau<br>Estate/Regent Estate/Bukit<br>Dinding Estate is monitored  | Stream water sampling and water samples are collected by   |



|       |  |  | IOI research Centre once a year.  |          |  |  |
|-------|--|--|---|----------|--|--|
| 7.8.2 | <b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian 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 buff<br>been identified and demarcated<br>chemicals and fertilizer applicat<br>maintenance. In some areas Guat<br>riverbanks. Management of rip   | protected including maintaining and<br>fer zones. Riparian buffer zones have<br>d. Signage has been placed. No<br>tion observed been used in their<br>temala grass were planted along the<br>parian zone is guided by Water<br>the buffer zones are guided by the | Complied |  |  |
|       | - Critical (Major) compliance -  | River width (meter)  | Minimum width for river reserve (m)   |          |  |  |
|       |  | <5   | 5   |          |  |  |
|       |  | 5-10   | 10  |          |  |  |
|       |  | 10-20  | 20  |          |  |  |
|       |  | 20-40  | 40  |          |  |  |
|       |  | >40  | 50  |          |  |  |
|       |  | There is a water stream found flowing in the Bukit Dinding Estate, and Bahau Estate. The management has sent the sample for the water stream monitoring, which is conducted once a year. All results shows compliance to Class III of National Water Quality Standards for Malaysia. Verified availability of signage and buffer zone marking. There were no chemical activities sighted.  Water stream testing records is as per in the 7.8.1 |   |          |  |  |



7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.

- Minor compliance -

Gomali Palm Oil Mill discharge POME through furrow system after treated as per "Jadual Pematuahan" No:004713 Signage on "Takat Pelepasan" was maintained at Mill has conducted water sampling at final discharge. Refer Report from Ecolab International Sdn Bhd dated 17/04/2024 with reference number TR-24-0235.

Complied

The mill discharge the effluent water through the furrow system.

#### 1. Mill Final Discharge

| Parameter           | Result | Limit     |
|---------------------|--------|-----------|
| pH                  | 8.8    | -         |
| BOD                 | 62.9   | 2500 mg/l |
| Ammoniacal Nitrogen | 39.8   | -         |
| Total Nitrogen      | 83.7   | -         |
| Oil & Grease        | 4.8    | -         |
| Suspended Solids    | 320    | -         |
| Total Solids        | 7584   | -         |

As stated in the "Peraturan Peraturan Kualiti Alam Sekeliling (Premis Yang Ditetapkan) (Minyak Kelapa Sawit Mentah) 1977" if the effluent is discharge through land application, the limit of BOD is 5000 mg/l. However the specific to Gomali Palm Oil Mill, the limit stated is 2500 mg/l. Only BOD is stated to be monitored.



|       |  | Base from the late   | et cample a  | nd quartorl   | v cuhmiccio  | n it is found t   | hat                    |          |
|-------|--|--|--|---|--|---|------------------------|----------|
|       |  | the mill complied Pematuhan"   |  |   |  |   |                        |          |
|       |  | The mill has also sampling, which versampling is of the  | vas conducte   |   |  |   |                        |          |
|       |  | Parameter  | S1   | S2  | S3   | S4  |                        |          |
|       |  | BOD  | 6  | Nil   | 6  | 6   |                        |          |
|       |  | COD  | 55   | 39  | 41   | 39  |                        |          |
|       |  | Ammoniacal<br>Nitrogen   | Nil  | Nil   | Nil  | Nil   |                        |          |
|       |  | TSS  | 21   | Nil   | 17   | 23  |                        |          |
|       |  | pH   | 7.1  | 6.8   | 6.7  | 6.9   |                        |          |
|       |  | Oil & Grease   | Nil  | Nil   | Nil  | Nil   |                        |          |
|       |  |  |  |   |  |   |                        |          |
| 7.8.4 | Mill water use per tonne of FFB is monitored and recorded.  - Minor compliance - | Mill has maintained which are recorded water catchment is with volume of FF consumption for available for reviewusage Record Gon | d monthly. Noy using pun<br>B process, the<br>every month<br>ew. Sample to | Vater for page of the tree of | processing is<br>and of water<br>ment has re<br>s of water<br>the year 202 | abstracted from usage is tandocorded the waconsumption 23. Refer Wa | om<br>em<br>iter<br>is | Complied |
|       |  | Mont   | h  |   | Water/mt F   | FFB   |                        |          |



| 7.9.1   | A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.  - Minor compliance - | A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environment Impact Assessment (EIA) management Action Plans and Continuous Improvement Plan 2024. Among the Energy Management Plan were: |      |  |  |  |  |  |
|---------|---|--|------|--|--|--|--|--|
| Cuitoui | on 7.9: Efficiency of fossil fuel use and the use of renewable ene  | 04/2024  | 0.87 |  |  |  |  |  |
|         |   | 03/2024  | 0.83 |  |  |  |  |  |
|         |   | 02/2024  | 0.82 |  |  |  |  |  |
|         |   | 01/2024  | 0.96 |  |  |  |  |  |
|         |   | 12/2023  | 0.82 |  |  |  |  |  |
|         |   | 11/2023  | 0.85 |  |  |  |  |  |
|         |   | 10/2023  | 0.83 |  |  |  |  |  |
|         |   | 09/2023  | 0.77 |  |  |  |  |  |
|         |   | 08/2023  | 0.81 |  |  |  |  |  |
|         |   | 07/2023  | 0.96 |  |  |  |  |  |
|         |   | 06/2023  | 1.00 |  |  |  |  |  |
|         |   | 05/2023  | 0.98 |  |  |  |  |  |
|         |   | 04/2023  | 0.91 |  |  |  |  |  |
|         |   | 03/2023  | 0.98 |  |  |  |  |  |
|         |   | 02/2023  | 0.87 |  |  |  |  |  |
|         |   | 01/2023  | 0.99 |  |  |  |  |  |

|        |  | that contain ii) Monitoring i iii) Continue th engines iv) Records of o v) To use bin usage for ev The mill and process/product | <ul><li>iii) Continue the regular servicing of vehicle for smooth running of engines</li><li>iv) Records of diesel usage by vehicles-genset and maintenance</li></ul>  |                        |                        |                |  |  |
|--------|--|---|--|------------------------|------------------------|----------------|--|--|
|        |  | Estate / Mill Bukit Dinding   | Diesel, (liter)  | FFB, (MT)              | Diesel / FFB (MT)      |                |  |  |
|        |  | Estate  Bahau Estate  | 46,046.00<br>106,294.00  | 19,172.00<br>55,648.00 | 1.91                   |                |  |  |
|        |  | Regent<br>Estate  | 73,830.00  | 33,548.56              | 2.20                   |                |  |  |
|        |  | Sagil Estate  | 149,443.50   | 25464.58               | 5.87                   |                |  |  |
|        | on <b>7.10:</b> Plans to reduce pollution and emissions, including greenligned to minimise GHG emissions.  | house gases (GHC  | G), are developed,   | implemented            | d and monitored and no | ew development |  |  |
| 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 - | by sustainability<br>The consumption  | The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO Palm GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:  FFB record book  Stock book |                        |                        |                |  |  |

## bsi.

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

|        |  | <ul> <li>Monthly stock issue</li> <li>Stock requisition note Mill</li> <li>Mill Month End Production Report</li> <li>Monthly production report</li> <li>Flowmeter &amp; running hours record book</li> <li>Gas engine monitoring record</li> <li>Effluent analysis report Based on the verification of records; all the sampled issuance was traceable.</li> </ul>  |                   |
|--------|--|---|-------------------|
| 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<br>Applicable |
| 7.10.3 | (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.  - Critical (Major) compliance -   | Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for pollution preventive action Plan FY 2024/2025 were:  • To ensure the preventive maintenance vehicles checklist were in place. Regularly inspection is carried out to these vehicles.  • To place tray underneath the vehicles.  • To use sufficient oil containment trays (drip trays) to trap the leakages from any part of the machinery to use rages to absorb accidental spillages on the floor | Complied          |
|        |  | To have proper monitoring, storing, and disposal of scheduled waste generated.  |                   |



|          |   | To utilise methane generated electric for domestic & mill usage.  |          |
|----------|---|---|----------|
| Criterio | on 7.11: Fire is not used for preparing land and is prevented in t  | he managed area   |          |
| 7.11.1   | (C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance -  | No new planting is happening at the Gomali Palm Oil Mill Certification unit. After checking documents, interviews, and visiting the site, it's confirmed that they aren't preparing for replanting by burning. This follows the Zero Open Burning policy in the SOP Section B2 - Felling/Land Clearing & Land Preparation from November 2008. The management is following Malaysian environmental laws — EQA and Regulations 1974. The records for land clearing and felling during the visit to estates show no open burning. They use methods like felling & chipping, cambering/land forming, and path construction for land clearing and preparation. |          |
| 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 - | Fire prevention measure has been established. Refer Emergency Preparedness and Response Procedures. Refer document no. UM/HSE/SP/02.  | Complied |
| 7.11.3   | The unit of certification engages with adjacent stakeholders on fire prevention and control measures.  - Minor compliance -                                   | There is evidence that management has engaged with stakeholders regarding on fire prevention and control measures. Refer Stakeholder meeting dated 23/04/2024 at Bukit Dinding Estate , 24/04/2024 at Bahau Estate, 25/04/2024 at Regent Estate and 29/04/2024 at Sagil Estate. The management briefed the IOI Group Fire Management Guideline and the stages on fire management to the stakeholders. The management Fire Prevention and Control Measures of IOI Plantation has been reviewed. The content of briefing includes the boundary maps, prohibition of open burning, fire prevention practise and emergency contact details.                   | Complied |

**Criterion 7.12:** Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.



| 7.12.1 | (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 -   | No new planting has been happening in the certification unit since 15/11/2018. An Internal High Conservation Value (HCV) Assessment was conducted in 2013 for the existing planted area. The report was prepared on 20/11/2018, covering all the operating units under Gomali Palm Oil Mill and the supply base. The report also includes Management Action Plans, which are reviewed annually.  | Complied          |
|--------|---|--|-------------------|
| 7.12.2 | <ul> <li>(C) HCVs, HCS forests and other conservation areas are identified as follows:</li> <li>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</li> <li>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</li> <li>PROCEDURAL NOTE:</li> <li>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</li> <li>- Critical (Major) compliance -</li> </ul> | In 2024, an Internal High Conservation Value (HCV) Assessment was carried out, and the report was prepared for each estate covering all the operating units under Gomali Palm Oil Mill and the supply base. The identified HCV and conservation areas include:  Bahau Estate:  HCV 4 - Natural water stream - 3.16 ha  Bukit Dinding Estate:  HCV 4 - Steep hill conservation area - 2.26 ha  HCV 4 - Natural water stream - 2.26 ha  Regent Estate  HCV 4 - Steep Area - 2.72 ha  Sagil Estate  HCV 4 - natural water streams - 6.95 ha  HCV 4 - Steep Area - 0.67 ha | Complied          |
| 7.12.3 | Indicator is not applicable in Malaysia context   | Not Applicable   | Not<br>Applicable |
| 7.12.4 | <b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated  | The estates have developed Management Action Plans for all identified High Conservation Value (HCV) areas, and these plans are reviewed annually. The management details are documented in the High  | Complied          |

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|        | 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).  - Critical (Major) compliance - | Conservation Value & Conservation Area Management Plans & Continuous Improvement Plan.  The sample of the implementation of the management plans for each estate are as following:  Bukit Dinding Estate / Bahau Estate/ Regent Estate/Sagil Estate:  Prohibition signs for chemical spraying, fertilizer application, tree cutting, open burning, fishing/poisoning fish, disposal of toxic waste, and hunting are erected in the HCV area,.  Buffer zone marking  Replanting will be conducted following IOI Buffer Zone maintenance guidelines  Animal sightings or traces are recorded, with a review of animal sighting records for FY 2024  Estate to check the area occasionally to prevent any oil spillage to the river. |                   |
|--------|---|---|-------------------|
| 7.12.5 | Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.  - Minor compliance -   | There was no rights of local communities been identified in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas.   | Not<br>Applicable |
| 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  | The estate's management consistently raises awareness about High Conservation Value (HCV) and Responsible Traceable Entrepreneurship (RTE) among workers through morning briefings and training sessions. Training records were reviewed based on criteria 3.7.2.   | Complied          |



|        | individual working for the company is found to capture, harm, collect, trade, possess or kill these species.  - Minor compliance -   | Additionally, the estates have placed signs at important locations within the estates, including the entrance, office, housing area, and notice board, to ensure that everyone is aware of HCV and RTE.  Furthermore, the estate communicates information about HCV and RTE to all stakeholders during stakeholders' meetings. This comprehensive approach ensures that awareness is promoted among workers and stakeholders alike.  Each estate has conducted the HCV training that include the spraying activity – no spraying at buffer zone, and RTE animal training. Sample taken on the training that were conducted on 13/02/2024 at Regent Estate and 16/04/2024 at Sagil Estate |          |
|--------|--|--|----------|
| 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 - | There are no new High Conservation Values (HCVs), High Carbon Stock (HCS) forests, peatland, or other conservation areas have been identified since 15/11/2018. The daily field supervision by field staff and executives ensures continuous monitoring of these areas.  The estate keeps records of animal sightings or traces, and a review of the animal sighting records for FY 2024 reveals various animals observed, including:  1. Long-tailed Macaque 2. Wild Boar 3. Elephant 4. Sambar Deer 5. Pig-tailed Macaque 6. Snake 7. Squirrel 8. Hornbill The RTE assessment was incorporated in the HCV report and evaluation. Therein providing wildlife database categories of;    | Complied |

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- i. Birds / Mammals / Herpetofauna
- ii. Conservation status
- iii. Offence and penalties under Wildlife Conservation Act 2010.
- iv. Provocation of wildlife.

In records there is no RTE species observed/spotted within the Estates in CU. Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemical's activities, awareness training to workers and patrolling by Auxiliary Police. The Estates reviewed the HCV management plan annually recent being on Jan 2024.

| HCV area        | Management & Monitoring   |  |  |  |
|-----------------|---|--|--|--|
|                 | Boundary markers estate/forest reserve  |  |  |  |
| Protected       | Signage - no illegal hunting/collecting & unauthorized  |  |  |  |
| areas           | entry   |  |  |  |
| RTE             | Patrol the boundary area Inform all stakeholders on HCV assessment/ protection Education & awareness for workers Ensure no agrochemical activities at bordering water bodies  |  |  |  |
| Sacred<br>sites | Clear demarcation and proper fencing at identified HCV Inform community concerning utilization of site To maintain cleanliness / upkeep of areas Maintain a buffer in order to secure the ares from fire and other disturbances To include areas in HCV map |  |  |  |



|        |   | Ecosystem  . Training maddescribed sho | reserve. Place signage Patrol bound. Socialize th identification employees Information te | oundary markers on no illegal act ary areas within the HCV assest management o stakeholders of HCV/ RTE management | tivities forest reserve resement consistir / monitoring n the HCV | gularly<br>ng of<br>to all |          |
|--------|---|--|---|--|---|----------------------------|----------|
|        |   | Su                                     | bject   | B Dinding  | Bahau   |                            |          |
|        |   | HCV Manag                              | ement   | 16/04/2024   | 08/03/2024  |                            |          |
|        |   | Buffer Zone                            | /Conservation   | 18/04/2024   | 05/01/2024  |                            |          |
|        |   | RTE Protect                            | on  | 16/04/2024   | 12/01/2024  |                            |          |
|        |   |  |   |  |   |                            |          |
|        |   | Su                                     | bject   | Regent   | Sagil   |                            |          |
|        |   | HCV Manag                              | ement   | 16/01/2024   | 16/04/2024  |                            |          |
|        |   | Buffer Zone                            | /Conservation   | 13/01/2024   | 16/04/2024  |                            |          |
|        |   | RTE Protect                            | on  | 16/01/2024   | 24/05/2024  |                            |          |
| 7.12.8 | <b>(C)</b> 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. |  | or HCV-HCSA a   | or HCV assessmen<br>assessment since   |   |                            | Complied |





| - Critical (Major) compliance - |  |
|---------------------------------|--|



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

The GHG emissions that were produced in 2023 for Gomali Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2023 for Gomali Palm Oil Mill and supply base are as following:

| Emission per product | tCO2e/tProduct |  |
|----------------------|----------------|--|
| СРО                  | 1.13           |  |
| PKO                  | 0.00           |  |

| ı | Extraction | %     |
|---|------------|-------|
| ( | OER        | 21.53 |
|   | KER        | 4.25  |
|   |            |       |

| Production   | t/yr       |  |
|--------------|------------|--|
| FFB Process  | 273,183.62 |  |
| CPO Produced | 60,266.232 |  |
| PKO Produced | 0.00       |  |

| Land Use                    |       | На        |
|-----------------------------|-------|-----------|
| OP Planted Area             |       | 27,870.26 |
| OP Planted on peat          |       | 0.00      |
| Conservation (forested)     |       | 0.00      |
| Conservation (non-forested) |       | 113.81    |
|                             | Total | 27,984.07 |

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

|  | Own Crop*  |                | Group              |                | 3 <sup>rd</sup> Party |                | Total      |                |
|--|------------|----------------|--------------------|----------------|-----------------------|----------------|------------|----------------|
|  | tCO₂e      | tCO₂e<br>/ FFB | tCO <sub>2</sub> e | tCO₂e<br>/ FFB | tCO₂e                 | tCO₂e<br>/ FFB | tCO₂e      | tCO₂e<br>/ FFB |
| Emission                                 |            |                |                    |                |                       |                |            |                |
| Land Conversion                          | 185683.69  | 9.73           | 38164.38           | 4.35           | 0.00                  | 0.00           | 223848.07  | 14.08          |
| CO <sub>2</sub> Emission from fertilizer | 14164.81   | 0.74           | 4485.67            | 0.51           | 0.00                  | 0.00           | 18650.48   | 1.25           |
| NO <sub>2</sub> Emission                 | 8417.90    | 0.44           | 2856.12            | 0.33           | 0.00                  | 0.00           | 11274.02   | 0.77           |
| Fuel Consumption                         | 2642.21    | 0.14           | 536.76             | 0.06           | 0.00                  | 0.00           | 3178.97    | 0.20           |
| Peat Oxidation                           | 0.00       | 0.00           | 0.00               | 0.00           | 0.00                  | 0.00           | 0.00       | 0.00           |
| Sink                                     |            |                |                    |                |                       |                |            |                |
| Crop Sequestration                       | -165753.77 | -8.68          | -34850.96          | -3.97          | 0.00                  | 0.00           | -200604.73 | -12.65         |
| Conservation Sequestration               | 0.00       | 0.00           | 0.00               | 0.00           | 0.00                  | 0.00           | 0.00       | 0.00           |
| Total                                    | 45154.84   | 2.37           | 11191.98           | 1.27           | 0.00                  | 0.00           | 56346.82   | 3.64           |

\*Note: Includes both estates and smallholders



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

|                              | tCO₂e     | tCO₂e/tFFB |  |  |  |
|------------------------------|-----------|------------|--|--|--|
| Emission                     |           |            |  |  |  |
| POME                         | 35817.58  | 0.13       |  |  |  |
| Fuel Consumption             | 326.47    | 0.00       |  |  |  |
| Grid Electricity Utilization | 68.50     | 0.00       |  |  |  |
| Credit                       | •         |            |  |  |  |
| Export of Grid Electricity   | 0.00      | 0.00       |  |  |  |
| Sales of PKS                 | -11109.49 | -0.04      |  |  |  |
| Sales of EFB                 | 0.00      | 0.00       |  |  |  |
| Total                        | 25103.06  | 0.09       |  |  |  |

#### **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  |

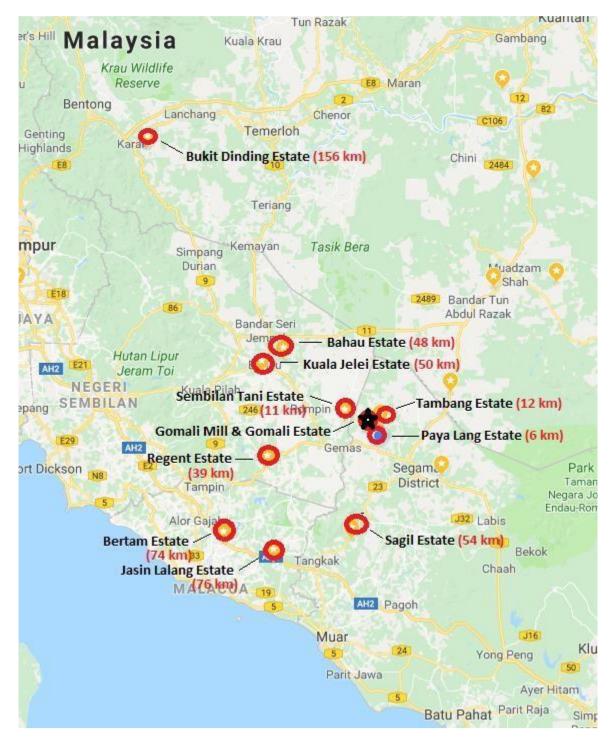
<sup>\*</sup>This mill has no kernel crusher operation.

| 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 (%)                       | 30   |  |  |  |
| Divert to methane captured (flaring) (%)           | 19.2 |  |  |  |
| Divert to methane captured (energy generation) (%) | 50.8 |  |  |  |



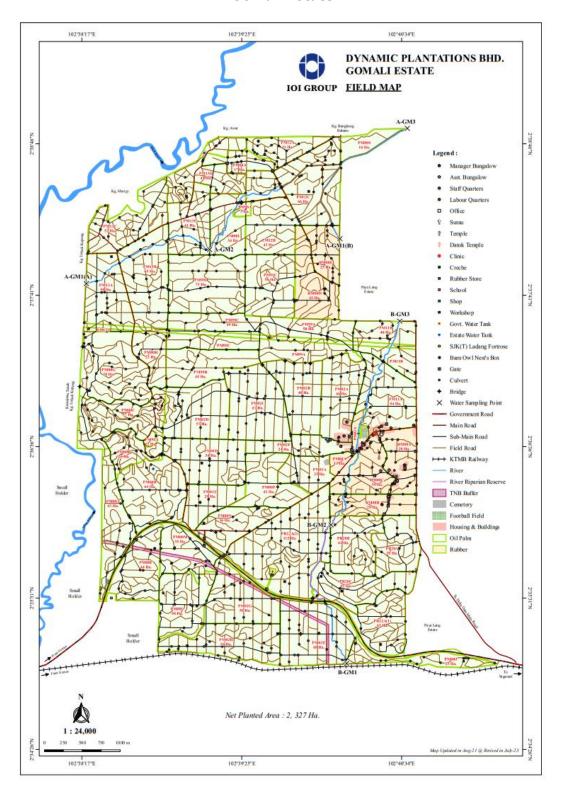
#### **Appendix C: Location Map of Certification Unit and Supply bases**





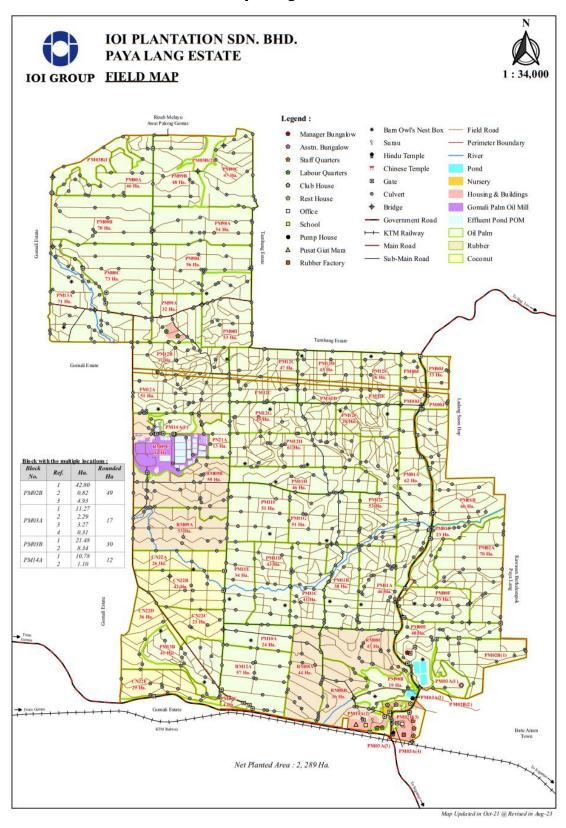
#### **Appendix D: Estate Field Map**

#### **Gomali Estate**



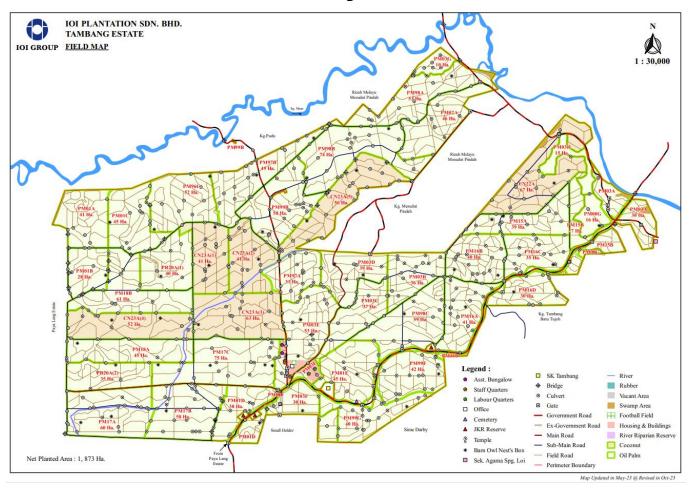


#### Paya lang Estate



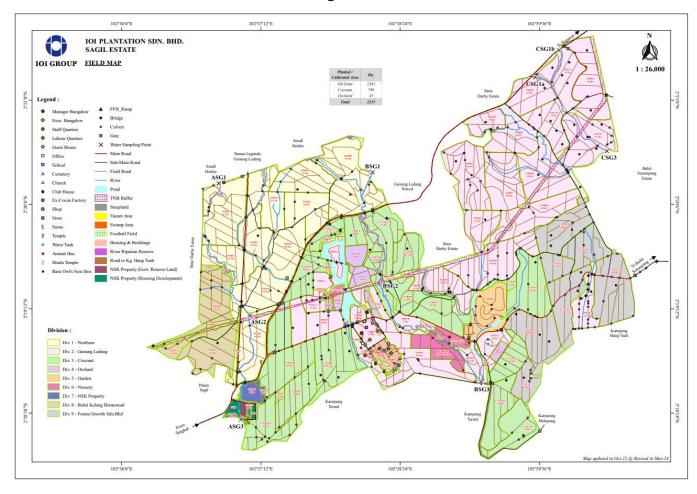


#### **Tambang Estate**



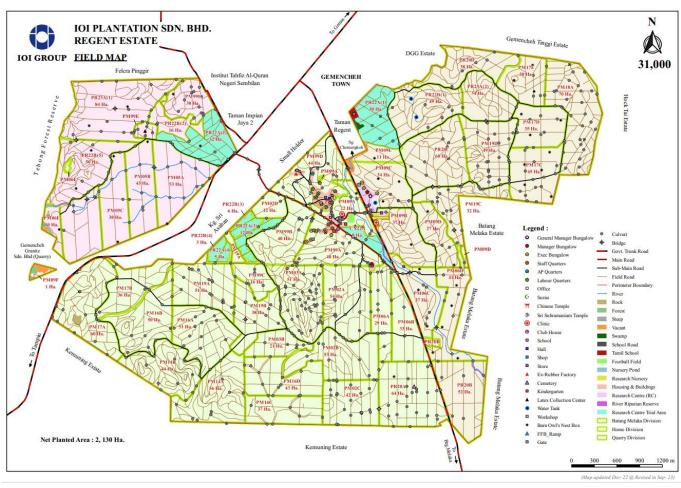


#### Sagil Estate



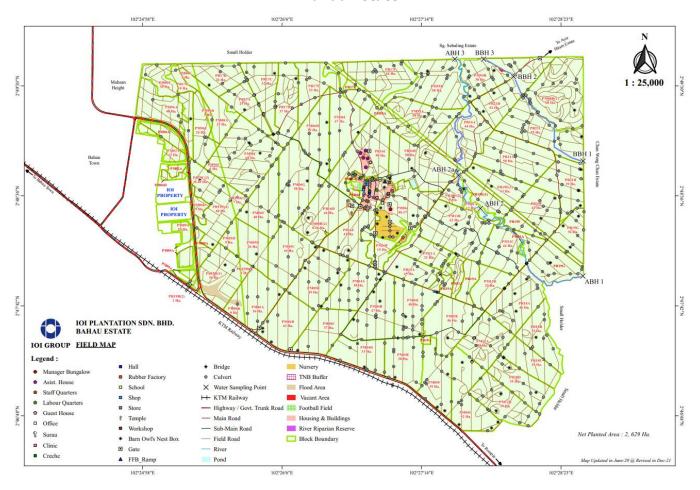


#### **Regent Estate**



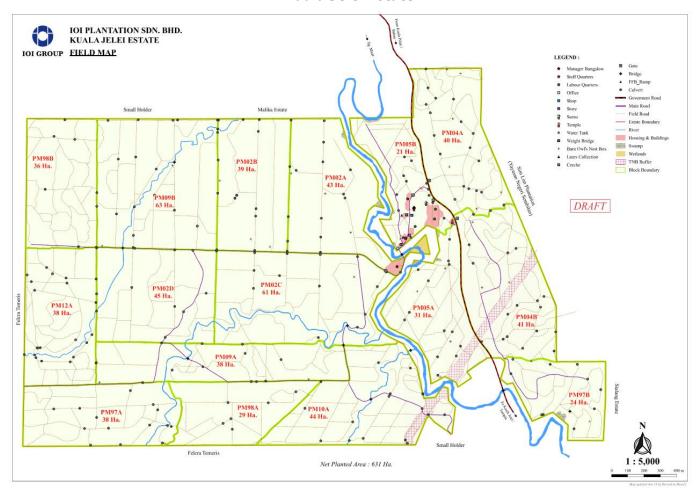


#### **Bahau Estate**



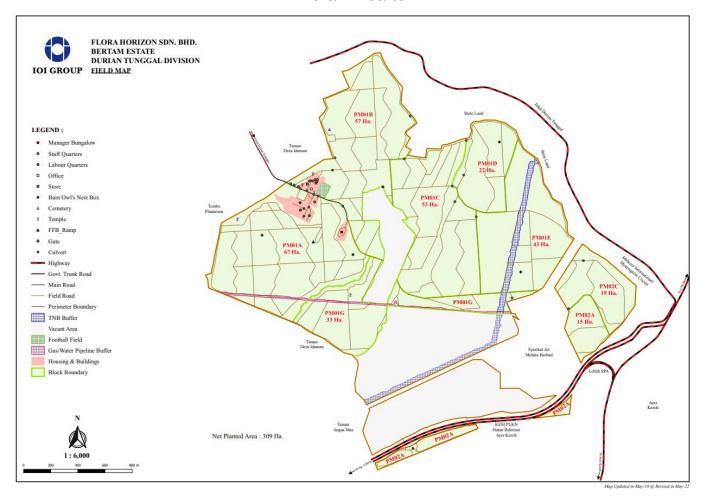


#### **Kuala Jelei Estate**



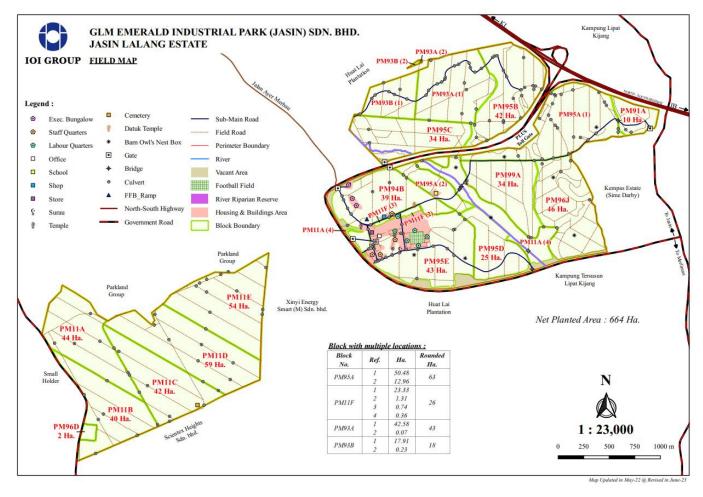


#### **Bertam Estate**



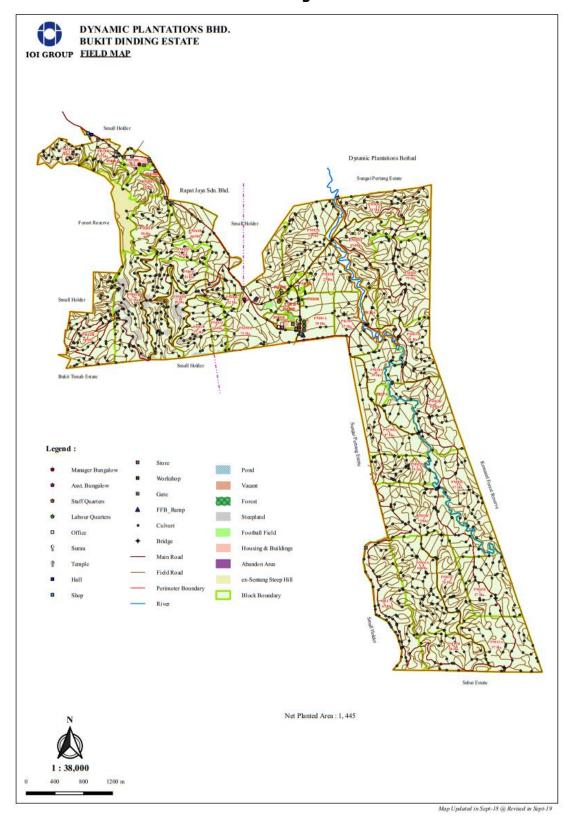


#### **Jasin Lalang Estate**



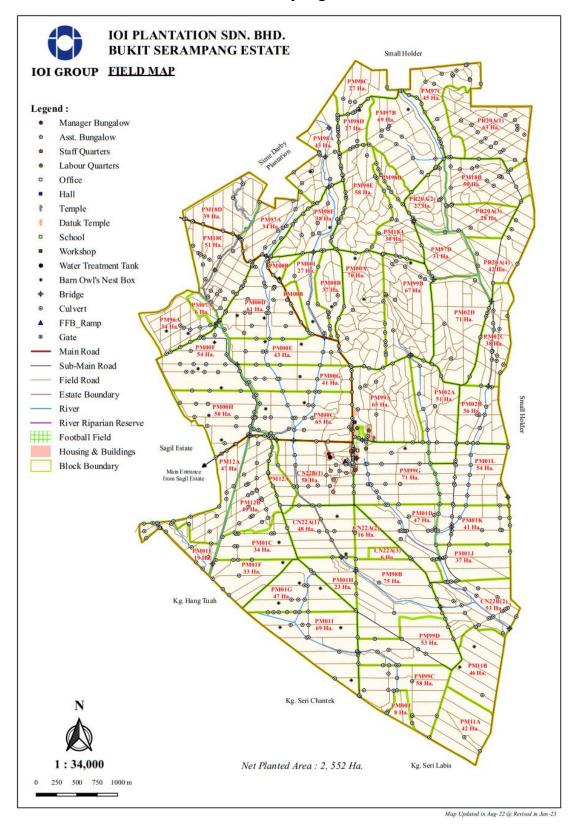


#### **Bukit Dinding Estate**





#### **Bukit Serampang Estate**





#### Appendix E: List of Smallholder Registered and/or sampled

| Sampling Group                          | <b>Current Certification</b> | Scope Extension | Other: |
|---|------------------------------|-----------------|--------|
| Risk Factor Applied                     | N/A                          | N/A             | N/A    |
| Justification of Risk Factor<br>Applied |                              |                 |        |
| Number of samples                       |                              |                 |        |
| Remarks                                 |                              |                 |        |

| No   | Name of farmer Loca                             | Location | GPS Reference |               | Area Summary<br>(Ha)       |                 | Forecasted annual FFB | Date of joining | Smallholder<br>ID |
|------|---|----------|---------------|---------------|----------------------------|-----------------|-----------------------|-----------------|-------------------|
|      |   |          | Latitude (N)  | Longitude (E) | Total<br>Certified<br>Area | Planted<br>Area | Production<br>(MT)    |                 |                   |
|      | Not Applicable                                  |          |               |               |                            |                 |                       |                 |                   |
|      | Total   |          |               |               |                            |                 |                       |                 |                   |
| Note | Note: * are smallholders sampled in this audit. |          |               |               |                            |                 |                       |                 |                   |



#### **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