

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company): IOI Corporation Berhad
Client company Address: IOI City Tower 2, Lebuhr IRC, IOI Resort City 62502 Putrajaya, Malaysia
Certification Unit: Pamol Plantations Sdn Bhd- Pamol Kluang Palm Oil Mill
Location of Certification Unit: 8½ Mile, Mersing Road 86007 Kluang, Johor, Malaysia.
Date of Final Report: 24/04/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	IOI Corporation Berhad		
RSPO Membership Number	2-0002-04-000-00	Membership Approval Date	17/05/2004
Address	IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Pamol Plantations Sdn Bhd- Pamol Kluang Palm Oil Mill		
Location / Address	8½ Mile, Mersing Road, 86007 Kluang, Johor, Malaysia.		
Website	www.ioigroup.com		
Management Representative	William Siow Kar Dat (Senior Sustainability Manager, Plantation Division, IOI HQ)	E-mail	william.siow@ioigroup.com
Telephone	+603-89478888 (Head Office)	Facsimile	+603-89432266 (Head Office)

2. Certification Information			
Certificate Number	RSPO 547027	Certificate Start Date	16/03/2020
Date of First Certification	16/03/2010	Certificate Expiry Date	15/03/2025
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 700802	Part 3 of MS 2530 – Plantations and organized smallholders	BSI Services (M) Sdn Bhd	30/12/2023
MSPO 700801	Part 4 of MS2530- Palm Oil Mill	BSI Services (M) Sdn Bhd	30/12/2023
MSPO 720913	MSPO SCCS:2018	BSI Services (M) Sdn Bhd	22/12/2024

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

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pamol Timur Estate	2,098	6.78	191.33	2,296.11	91.37
Pamol Barat Estate	2,124	7.23	179.09	2,310.32	91.94
Mamor Estate	2,073	48.36	108.64	2,230	92.96
Unijaya Estate	1,166	1.97	92.53	1,260.50	92.50
Kahang Estate	2,278	4.11	137.79	2,419.90	94.14
Swee Lam Estate	1,098	2.16	60.80	1,160.96	94.58
Total	10,837	70.61	770.18	11,677.79	

Note:

Pamol Timur Estate

1) Increase 4ha of planted area due to:

- PM09 increase 2ha due to updated housing and buildings in field PM09F based on UAV Imagery
- PM11 increase 2ha due to updated housing and buildings in field PM11A based on UAV Imagery

Pamol Barat Estate

1) Variance 0.04 ha river (HCV 4) due to the re-demarcation by GIS

Mamor Estate

1) Total planted reduced 1 Ha due to new river in field PM98E

2) Increase 2.32ha river due to declared new river in field PM98D, PM98E and PM99C

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pamol Timur Estate	12	1,371	489	226	0	2,086	12
Pamol Barat Estate	414	1,506	204	0	0	1,710	414
Mamor Estate	0	0	1,156	917	0	2,073	0
Unijaya Estate	252	375	475	64	0	914	252
Kahang Estate	0	0	2,278	0	0	2,278	0
Swee Lam Estate	0	308	429	192	169	1,098	0
Total (ha)	678	3,560	5,031	1,399	169	10,159	678

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated (Mar 2021 – Feb 22)	Actual (Nov 20 – Oct 21)		Forecast (Mar 2022 – Feb 23)
		Previous license period (Nov 20 – Feb 21)	Current license period (Mar 21 – Oct 21)	
Pamol Timur Estate	48,174	17,138.54	33,825.02	48,209
Pamol Barat Estate	39,678	9,437.75	27,158	32,134
Mamor Estate	51,893	9,564.02	28,612.26	48,533
Unijaya Estate	24,070	4,742.64	17,305.64	24,020
Kahang Estate	63,976	20,685.24	2,8580.28	64,930
Swee Lam Estate	27,920	2,702.63	19,415.11	27,816

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Total	255,711	219,167.13	245,642
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8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated (Mar 2021 – Feb 22)	Actual (Nov 20 – Oct 21)		Forecast (Mar 2022 – Feb 23)
		Previous license period (Nov 20 – Feb 21)	Current license period (Mar 21 – Oct 21)	
Nil				
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated (Mar 2021 – Feb 22)	Actual (Nov 20 – Oct 21)		Forecast (Mar 2022 – Feb 23)
		Previous license period (Nov 20 – Feb 21)	Current license period (Mar 21 – Oct 21)	
Nil				
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Nov 20	12,035.94	0	12,035.94
2	Dec 20	13,749.82	0	13,749.82
3	Jan 21	11,069.34	0	11,069.34
4	Feb 21	12,140.56	0	12,140.56
5	Mar 21	15,275.16	0	15,275.16
6	Apr 21	21,932.97	0	21,932.97
7	May 21	20,623.61	0	20,623.61
8	June 21	20,631.50	0	20,631.50
9	July 21	21,769.11	0	21,769.11
10	Aug 21	25,212.80	0	25,212.80
11	Sept 21	22,068.36	0	22,068.36

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12	Oct 21	22,657.96	0	22,657.96
TOTAL		219,167.13	0	219,167.13

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated* (Mar 2021 – Feb 22)	Actual (Nov 20 – Oct 21)		Forecast (Mar 2022 – Feb 23)
	Previous license period (Nov 20 – Feb 21)	Current license period (Mar 21 – Oct 21)	
FFB	FFB		FFB
289,401 mt	64,270.82 mt	154,896.31 mt	245,642 mt
	219,167.13 mt		
CPO (OER: 23.53%)	CPO (OER: 22.94%)		CPO (OER: 21.75%)
68,082.09 mt	14,663.09 mt	35,621.30 mt	53,427.14 mt
	50,284.39 mt		
PK (KER: 4.72%)	PK (KER: 4.53%)		PK (KER: 5.5%)
13,661.27 mt	2,921.928 mt	7,008.314 mt	13,510.31 mt
	9,930.24 mt		
Note: *Extension of volume; FFB:33,690 mt, CPO: 7,990 mt & PK: 1,515 mt			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Nov 20	2,740.24	590.76
2	Dec 20	3,107.51	590.76
3	Jan 21	2,442.38	460.06
4	Feb 21	2,807.00	563.43
5	Mar 21	3,565.96	716.92
6	Apr 21	4,991.493	1,038.474
7	May 21	4,796.483	919.226
8	June 21	4,851.353	841.097
9	July 21	5,011.617	906.015
10	Aug 21	5,802.421	1,221.011
11	Sept 21	5,054.551	1,049.193
12	Oct 21	5,113.386	1,033.298
TOTAL		50,284.39	9,930.24

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11. Summary of Actual Volume sold					
Current License period (Mar 21 – Oct 21)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	28,025.49	-	-	-	28,025.49
PK (MT)	6,662.58	-	-	-	6,662.58
Credits	-	-	-	-	-
Previous License period (Nov 20 – Feb 21)					
CPO (MT)	13,938.10	-	-	-	13,938.10
PK (MT)	2,739.16	-	-	-	2,739.16
Credits	-	-	-	-	-
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	IOI Commodity Trading Sdn Bhd	RSPO_PO1000003601	41,963.59	9,401.74
TOTAL			41,963.59	9,401.74

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

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

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11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
TOTAL			N/A

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	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									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume (NA)						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (Not applicable)						
Credits						
Physical						

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: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **24-26/11/2021**. 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 **18/2/2022**. 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 company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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.

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For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Pamol Kluang POM	√	√	√	√	√
Pamol Timur Estate		√			√
Pamol Barat Estate	√			√	
Mamor Estate			√		
Unijaya Estate		√			√
Kahang Estate			√		
Swee Lam Estate	√			√	

Tentative Date of Next Visit: November 14, 2022 - November 17, 2022

Total Number of Mandays: 12 man days

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Zainal (MHZA) Hidhir Abidin	Team Leader	<p>Education: Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: 10 years working and auditing experience in palm oil industry specifically on palm oil milling for 5 years.</p> <p>Training attended: ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO P&C and SCCS. Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015</p> <p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG and HCV. Supply Chain, General Custody of Chain, Rules on Market Communications & Claims</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>
Mahzan (MM) Munap	Team Member	<p>Education: Holds a Bachelor of Science in Petroleum Engineering from University of Missouri, USA and Master of Business Administration from Ohio University</p> <p>Work Experience: 38 years of working experience spanning the oil & gas, chemicals and petrochemicals, power generation, cement plants, electronics,</p>

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		<p>services, construction and general manufacturing industries, oil palm plantations and government sectors. Has extensive experience in developing and implementing Safety and Environmental Management System, preparing Emergency Response Procedures, conducting Safety and Environmental Audits, Quantified Risk Assessment, Loss Control and Prevention and HAZOP studies for the major petrochemical and chemical industries. Has been qualified to perform ISO9001, ISO14001, OHSAS18001 (now ISO45001), since year 2000 and later qualified to perform RSPO P&C and MSPO P&C audits.</p> <p>Training attended: He has completed Endorsed RSPO P&C Lead Assessor Course, ISO 9001 IRCA accredited Lead Assessor training, ISO 14001 EMS RABQSA/IRCA Lead Assessor Course and HCV & HCS Training and SMETA Requirements Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV, environmental and occupational safety & health.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>
Rahayu Zulkifli (RZ)	Team Member	<p>Education: Holds a Law Degree from John Moores University, Liverpool, United Kingdom in 1988.</p> <p>Work Experience: She was a practicing lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana. Additionally, she also assists in HCV assessments (in particular HCV 5 & 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator.</p> <p>Training attended: RSPO-endorsed Lead Auditor course, ISO 14001 Lead Auditor course, MSPO Awareness Training in 2016, and RSPO-endorsed Lead Auditor Refresher course.</p> <p>Aspect covered in this audit: During this assessment, she assessed on the aspects of legal, social and stakeholder engagement.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>

Accompanying Persons: Nil

1.3 Assessment Plan

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

Date	Time	Subjects	MH	RZ	MM
Monday 22/11/2021	PM	Audit team travel to Kluang. Check in at Anika Hotel, Kluang	√	-	-
Tuesday 23/11/2021	0900 - 1700	MSPO SCCS audit	√	-	-
	PM	Audit team travel to Kluang. Check in at Anika Hotel, Kluang	-	√	√

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<p>Wednesday 24/11/2021</p> <p>Pamol POM</p>	0730	Audit team travel to Pamol POM	√	√	√
	0830 - 0900	<p>Opening Meeting:</p> <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). • Verification on previous audit findings 			
	0830 - 1200	<p>Pamol POM</p> <p>Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.</p> <p>RSPO Supply chain requirements for mill</p> <ul style="list-style-type: none"> - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims 	√	√	√
	1230 - 1330	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	-	√	-
	1230 - 1330	Lunch	√	√	√
	1330 - 1630	<p>Pamol POM</p> <p>Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc</p>	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
<p>Thursday 25/11/2021</p> <p>Kahang Estate</p>	0730	Audit team travel to Kahang estate	√	√	√
0830 - 1200	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,				

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		Landfill, etc.			
	1000 – 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	-	√	-
	1230 – 1330	Lunch break	√	√	√
	1330 - 1630	Kahang Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Friday 26/11/2021	0730	Travel to Mamor Estate	√	√	√
Mamor Estate	0830 - 1200	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.			
	1000 – 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	-	√	-
	1230 – 1330	Lunch break	√	√	√
	1330 - 1630	Mamor Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1700	Presentation of finding and closing meeting	√	√	√
	1700	End of audit	√	√	√

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Major NC close out verification

Date	Time	Subjects	Mohd Hidhir
Thursday 17/2/2022		Audit team travel to Kluang. Check in at Anika Hotel	√
Friday 18/2/2022 Pamol POM	0730 08.30 – 09.15	Travel to Pamol POM Opening Meeting <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Briefing on verification plan 	√
	09.15 – 10.30	Pamol POM – Verification on previous Major NC. <ul style="list-style-type: none"> • Physical and site inspection/workers interview (if required) • Document review – implemented evidence 	√
	11.30 – 12.00	Closing meeting (conclusion and recommendation).	√

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. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31 st December 2021	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31 st December 2021 and IOI ACOP 2020 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. The ACOP Report states that IOI Corporation Berhad plans to achieve 100% RSPO Certification for all estates and mill by 2023. https://www.rspo.org/members/62/IOI-Group	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.	No new acquisition as to date.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No deviations	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?	There has been no any changes to the time bound plan since the last audit. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31 st December 2021. This is consistent with the ACOP Reporting last submitted for 2020.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31 st December 2021 and IOI ACOP 20202 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
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No. Refer to IOI Corporation Berhad Time Bound Plan updated as of 31 st December 2021 and IOI ACOP 2020 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.	Choose an item.
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.	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.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	The concession in Indonesia PT. KPAM had undergone the NPP process prior to any new planting. RSPO has approved PT.KPAM NPP	Complied

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	<p>Summary Report and was published in RSPO website for public notification on 13 April 2018.</p> <p>The NPP public notification could be assessed through the link below: https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?</p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below: http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility as per the link below: https://askrspo.force.com/Complaint/s/case/50090000028ErzqAAC/detail</p> <p>This is further check in the website: https://www.rspo.org/certification/remediation-and-compensation/racp-tracker.</p> <p>Only 1 (one) management unit identified with potential liability and require concept note and remediation plan as reported in case tracker.</p> <p>Further information on the current progress is currently available in IOI Corporation Berhad's Website: https://www.ioigroup.com/Content/S/S_Progress</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>The were no labour dispute reported</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>There was no legal non-compliance reported.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes. Internal audit was carried out for IOI Pelita Plantation Sdn Bhd (Sejap and Tegai Estate) and SNA Group on November 2020. Positive assurance statement was made based on the audit results.</p>	<p>Complied</p>
<p>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?</p>	<p>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</p>	<p>Complied</p>

Have there been any stakeholder (including NGO) consultation conducted?	No stakeholder comments recorded	Complied
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3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

Details of IOI Corporation Berhad Time Bound Plan updated as of 30th September 2021

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakan, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	Recertification audit: 30% remote audit done in Aug'21. Pending for follow-up onsite audit.	No outstanding issues
	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2020	ASA-02 audit completed in November 2021	No outstanding issues
	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Apr 2020	ASA-02 audit completed in November 2021	No outstanding issues
	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, and Jasir Lalang	Aug 2009	Re-Certified in Oct 2020	ASA-01 audit completed in July 2021	No outstanding issues
	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2020	ASA-01: 30% remote audit done in July'21. 70% onsite audit completed in November 2021.	No outstanding issues
	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	ASA-01 audit completed in September 2021	No outstanding issues

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	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	ASA-01: 30% remote audit done in Oct'21. Pending for follow-up onsite audit.	No outstanding issues
	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	Recertification audit completed in March 2021	No outstanding issues
	Leepang (Sabah) POM	Morisem 5, Leepang 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Re-certified in December 2018	ASA-03: 30% remote audit done in Aug'21. 70% onsite audit completed in November 2021.	No outstanding issues.
	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Re-certified in Mar 2018	ASA-03: 30 % remote audit conducted in January 2021. 70% onsite audit completed in April 2021.	No outstanding issues
	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and Bimbingan 2	Oct 2012	Re-certified in July 2018	ASA-03: 30 % remote audit conducted in February 2021. 70% onsite audit completed in March 2021.	No outstanding issues
	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang 2, Leepang 3, and Leepang 4	Sept 2013	Re-certified in December 2018	ASA-03 audit completed in November 2021	No outstanding issues

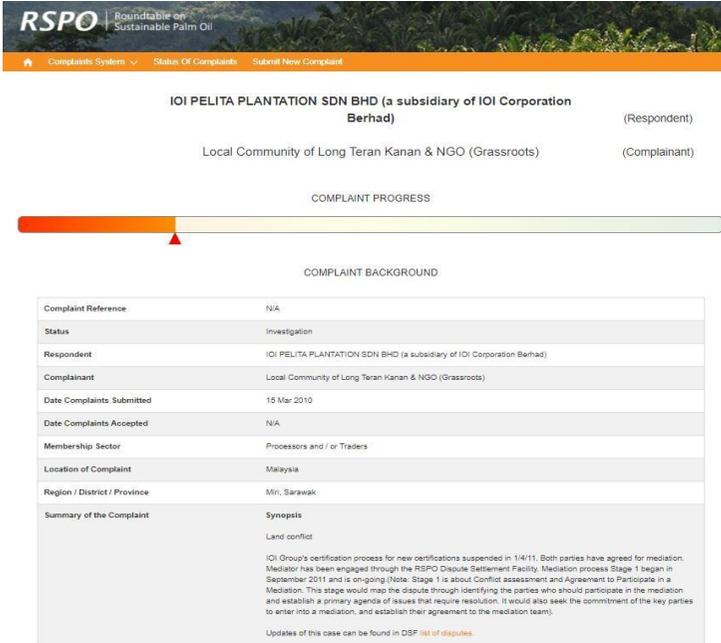
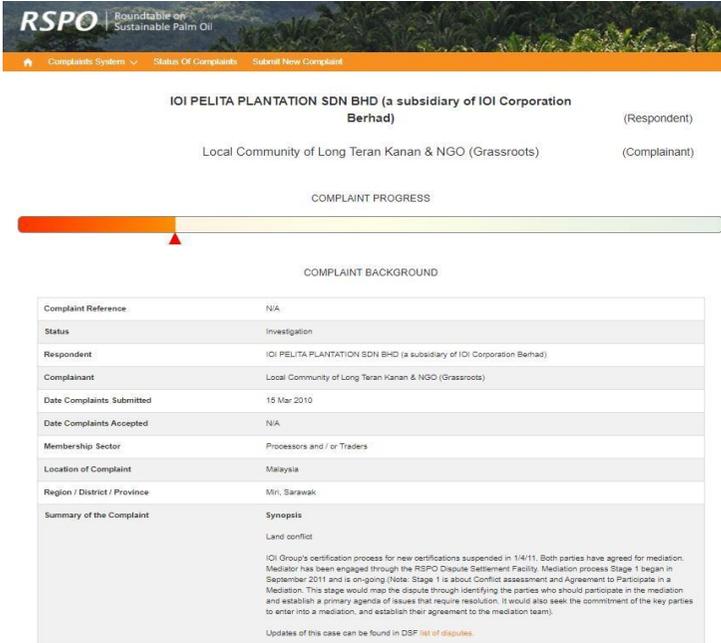
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	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 (Outgrowers & Smallholders)	Planned - 2018	Certified in July 2018	ASA-03 audit completed in April 2021.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 17 (Outgrowers & Smallholders)	Dec 2017	Certified in May 2018	ASA-03 audit completed in March 2021.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
	IOI – Pelita, Sarawak	Sejap and Tegai	Planned – TBC as it is under the resolution process	Uncertified Unit	IOI – Pelita (Sarawak) is in the resolution process (under RSPO CP)	<p><u>Stage 3: Negotiations for Final Settlement</u></p> <p>As soon as the Movement Control Order (MCO) was lifted, IOI Pelita held the second round of negotiations with all eight communities, one at a time, on 23-25 September 2021. Similar to the first round of negotiations, the meetings were observed by RSPO and other relevant stakeholders such as the Sarawak State government representatives. Due to Covid-19 travel restrictions some participants had opted to join the process via Zoom. The meetings were videotaped and recorded.</p> <p>All eight communities provided their response to IOI Pelita’s settlement offers.</p> <p>Long Jegan community made two requests for the Sarawak State Government:</p> <ol style="list-style-type: none"> 1) to provide reassurance that the excised land will not be given to anyone else but the 8 community groups participating in the resolution process, and 2) to appointment of facilitator for the process of dividing the excised land among the community groups. <p>The eight community, LTKB, asked IOI Pelita to excise 300 ha of IOI Pelita planted land (the land IOI Pelita keeps) and return it back to LTKB. This, however, is legally impossible. IOI Pelita is a leaseholder and it can only surrender the land to the Sarawak State Government. This fact was explained to the LTKB community but the community stood firmly by its demand.</p> <p>As soon as the 2nd round of negotiations ended on Saturday, September 25th, IOI</p>

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						<p>Pelita, Dr Ramy Bulan, and all government agencies participating in the negotiations recognized the need to address Long Jegan’s concerns and came up with a detailed action plan aimed at providing all communities with more clarity and reassurance as to how the Sarawak State Government will handle the question of land titling and which agency will play a facilitation role and help communities divide the excised land among themselves.</p> <p>In October 2021, IOI Pelita held several meetings with the Sarawak State Government representatives to address communities’ remaining concerns regarding the status of the 4,615 hectares of land that IOI Pelita agreed to surrender.</p> <p>An inter-governmental meeting held on 2 December 2021 decided that Resident of Miri Office, acting on behalf of the Sarawak State Government, will meet each affected community to:</p> <ol style="list-style-type: none"> 1) inform them that the land surrendered by IOI Pelita will be gazetted as communal land under Section 6 of the Land Code, with all 8 communities as trustees, 2) ask for communities’ consent to allow a licensed surveyor to conduct a survey of the excised land as it is the necessary step for publishing the gazette, 3) reassure them that the survey will take into account the results of the Community Participatory Mapping conducted by CICOM, <p>explain that it will be entirely up to the communities how they divide the gazetted land among themselves.</p> <p><u>Progress on Stage 2: Community Participatory Mapping</u></p> <p>Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping, started in August 2019. Technical assistance to the affected communities is being provided by</p>

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						<p style="text-align: center;">COMPLAINT UPDATE</p> <table border="1"> <thead> <tr> <th>DATE</th> <th>UPDATE</th> <th>DOCUMENTS</th> </tr> </thead> <tbody> <tr> <td>15 Dec 2021</td> <td>Pending update on negotiations.</td> <td></td> </tr> <tr> <td>29 Sep 2021</td> <td>Pending report from Complaints Desk and deliberation by the CP.</td> <td></td> </tr> <tr> <td>25 Aug 2021</td> <td>Pending report from the Complaints Desk.</td> <td></td> </tr> <tr> <td>28 Jul 2021</td> <td>The Respondent has invited the RSPO Secretariat to participate in the second phase of negotiation and witness the process of the signing of the settlement agreement by the communities.</td> <td></td> </tr> <tr> <td>23 Jun 2021</td> <td>The Complaints Desk had a meeting with representatives of the Respondent. The Respondent have also forwarded to the Complaints Desk some supporting documents. They are currently being reviewed by the Complaints Desk.</td> <td></td> </tr> <tr> <td>25 May 2021</td> <td>The Secretariat's review is underway. The Secretariat to reach out to the Respondent on updates.</td> <td></td> </tr> </tbody> </table> <p>Further and updated progress of this issue could be access through the link below;</p> <p><u>IOI Pelita Land Dispute Resolution Plan</u> <u>Current progress on IOI Pelita Land Dispute Resolution Process</u> https://www.ioigroup.com/Content/MEDIA/M_Media?Category=7 <u>RSPO Case Tracker – IOI Pelita Status of Complaints</u> <u>IOI Pelita & Stakeholders Reaching a Breakthrough</u> Internal audit for Sejap Estate have been completed in November2020</p>	DATE	UPDATE	DOCUMENTS	15 Dec 2021	Pending update on negotiations.		29 Sep 2021	Pending report from Complaints Desk and deliberation by the CP.		25 Aug 2021	Pending report from the Complaints Desk.		28 Jul 2021	The Respondent has invited the RSPO Secretariat to participate in the second phase of negotiation and witness the process of the signing of the settlement agreement by the communities.		23 Jun 2021	The Complaints Desk had a meeting with representatives of the Respondent. The Respondent have also forwarded to the Complaints Desk some supporting documents. They are currently being reviewed by the Complaints Desk.		25 May 2021	The Secretariat's review is underway. The Secretariat to reach out to the Respondent on updates.	
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	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned 2022	- Uncertified Unit	RSPO Stage 1 was conducted in September 2019.	RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT.																					

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						<p>BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p>

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						<p>PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS), PT Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad) (Respondent)</p> <p>Aidenvironment (Complainant)</p> <p>COMPLAINT PROGRESS</p> <p>COMPLAINT BACKGROUND</p> <table border="1"> <tr> <td>Complaint Reference</td> <td>N/A</td> </tr> <tr> <td>Status</td> <td>Case closed</td> </tr> <tr> <td>Respondent</td> <td>PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS), PT Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad)</td> </tr> <tr> <td>Complainant</td> <td>Aidenvironment</td> </tr> </table> <p>(c) RSPO Post-Complaints Monitoring</p> <p>RSPO Roundtable on Sustainable Palm Oil</p> <p>ABOUT MEMBERSHIP CERTIFICATION SMALLHOLDERS P&C 2018 IMPACT MyRSPO</p> <p>RSPO / Investigation & Monitoring Unit (IMU) / Monitoring / Post-Complaints Monitoring</p> <p>Post Complaints Monitoring</p> <table border="1"> <thead> <tr> <th>TITLE</th> <th>CURRENT STATUS</th> </tr> </thead> <tbody> <tr> <td>PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No. CR-0008B2</td> <td>Closed</td> </tr> </tbody> </table>	Complaint Reference	N/A	Status	Case closed	Respondent	PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS), PT Sawit Nabati Agro (PT SNA) (a subsidiary of IOI Corporation Berhad)	Complainant	Aidenvironment	TITLE	CURRENT STATUS	PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No. CR-0008B2	Closed
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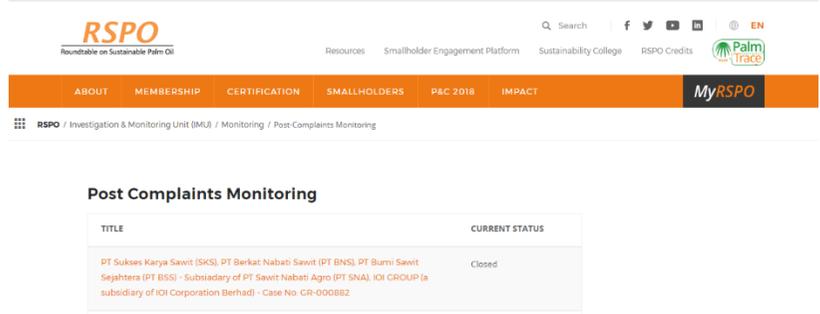
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						<p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI. Due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. The postponement of the main assessment has been communicated and approved by RSPO. In November 2020, PT. SKS internal audit has been conducted.</p> <p>Date of RSPO main assessment audit has been proposed to CB to be conducted in Mid 2022.</p>
	PT BNS, Indonesia	BNS 1, BNS 2, BNS 3 and BNS 4	Planned 2022	- Uncertified Unit	RSPO Stage 1 audit was conducted in September 2019	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be accessed through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p>

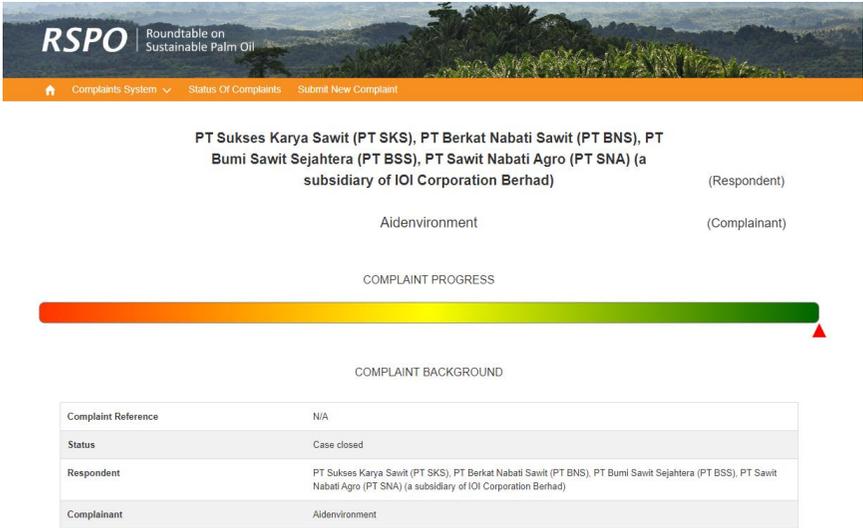
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						<p>(c) RSPO Post-Complaints Monitoring</p>

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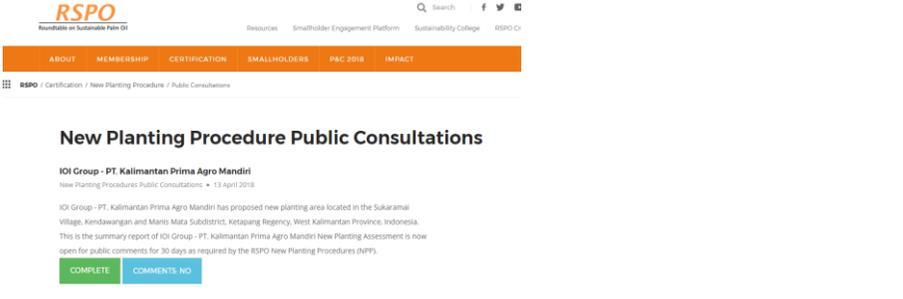
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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						<p>PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p>  <p>(c) RSPO Post-Complaints Monitoring</p>

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						<p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI. Due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. The postponement of the main assessment has been communicated and approved by RSPO. In November 2020, PT. BSS internal audit has been conducted.</p> <p>Date of RSPO main assessment audit has been proposed to CB to be conducted in Mid 2022.</p>
	PT KPAM, Indonesia	Under Development	Planned - 2023	Uncertified Unit	NPP and HCSA was approved in April 2018. Currently under development.	RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
						 <p>https://rspo.org/certification/new-planting-procedure/public-consultations/page/2? HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below: http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf</p>

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 1 Critical; 1 Minor nonconformities and 2 Opportunity For Improvement raised. The *Pamol Kluang POM* Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2130106-202111-M1	Date Issued	26/11/2021
Due Date	24/2/2022	Date of nonconformity Closure	23/2/2022
Clause & Category (Critical / Minor)	7.10.3 (Critical)		
Statement of Nonconformity:	Plan to reduce or minimise significant pollutants was not effectively implemented and monitored		
Requirement Reference:	Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.		
Objective Evidence:	Based on observation during site visit at Pamol POM parameter discharge points; Oil trap no.1 - Hot water flowing to oil trap no.1 and discharge to the nearby estate drain/stream. Oil trap no.5 - Unpleasant odor of orangey/yellowish murky water with oil scum observed in all 3 compartments of oil trap No evidence to show that discharge limit has been met from both oil traps and comply with EQA 1974, section 25(1) restriction on pollution on inland water.		
Corrections:	Oil trap no 1: Environmental Aspect and Impact Assessment is revised to include buffer such as sump is made to reduce the temperature from blowdown of boiler from entering straight to the nearby drain/waterways. Oil trap no 5: Immediate action has been taken by cleaning off the oil trap no 5 by the workers and currently no cleaning has been done in kernel bunker area until the modification at kernel area is done.		
Root Cause Analysis:	Oil trap no 1: Existing Control Measure (ECM) in Environmental Aspect Impact Assessment (EAIA) do not include plan to control high temperature of boiler's blowdown water from entering drainage /waterways system without proper buffer in order to reduce the temperature. Thus, it was not properly implemented. Oil trap no 5: Besides, in the Environmental Aspect and Impact 2021 for column Existing Control Measure do not mention that the palm oil mill should be equipped with facility to		

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	<p>contain the residues from cleaning water in kernel bunker area from flowing straight into nearby oil trap. Thus, the wastewater from cleaning activity in kernel bunker area was flowing straight into oil trap no 5 with no sump to contain the residues from cleaning activity</p>
<p>Corrective Actions:</p>	<p>Oil trap no 1: Cooling pit will be constructed with dimension of 1m(length) x 1m (width) x 1m (height) with additional of ventilation fan to speed up the cooling process of hot water from the boiler blowdown until the temperature reach below 38 Degree Celsius before it flowing into oil trap no 1 and discharge into the nearby drain.</p> <p>Oil trap no 5: Mill will modify drainage system at the kernel bunker area by building another retention sump to filter contaminants from cleaning activity at the bunker from flowing straight to Oil trap no 5.</p>
<p>Assessment Conclusion:</p>	<p>Major NC close out verification:</p> <ul style="list-style-type: none"> i) Environmental Impact Assessment (EIA) for ramp, marshalling yard and CPO dispatch bay has been revised on 15/2/2022 to include Environmental Control Measure (ECM) related to cleaning of kernel bunker area and discharge of boiler's water blowdown. Implementation on the ground was found to be tally with the ECM. ii) The latest cleaning and desludging of oil traps was done on 8/2/22 for both oil trap no.1 and no.5. Based on site verification, the trapping system is functioning well and no traces of oil/contaminants found. iii) Onsite verification was done at boiler area; cooling sump/tank was built with additional buffer (to increase hydraulic retention time @ HRT). The cooling tank/sump can retain at least 1 ton/1 m3 of blowdown water before entering monsoon drain. Design calculation was verified with volume of blowdown water discharge and found to be sufficed. Design requirement: 0.244 m3, actual volume constructed: 1 m3. Temperature recorded is less than 30 degree Celsius. iv) Additional oil trap constructed near to kernel bunker sump before entering oil trap no.5. T-underflow system was built to trap oil/contaminants and found to be effective. No evidence oil/contaminations seen during site verification. Only clear water overflowed to nearby field drain. v) Monitoring of oil trap 1 and cooling sump/tank monitored on weekly and bi-weekly basis. Based on the latest records for January and February 2022, no upset condition recorded in the checklist. <p>The major NC is effectively closed on 23/2/22 with sufficient evidence of implementation. Continuous implementation will be further verified in the next assessment</p>

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Non-conformity			
NCR Ref #	2130109-202111-N1	Date Issued	26/11/2021
Due Date	Next annual surveillance assessment	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	7.11.3 (minor)		
Statement of Nonconformity:	Engagement process with adjacent stakeholders on fire prevention and control measures was not effectively demonstrated.		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures		
Objective Evidence:	Based on the last group stakeholder meeting minute dated 28/10/21 for Pamol Complex, fire prevention and control measures presented to the stakeholders. Adjacent stakeholders (Ladang Kekayaan, Ladang Tereh, Smallholder near to PM98E @ Bukit Batu - Mamor Estate) and (Zamrud Estate, Sembrong Estate, Ladang Hutan Getah - Kahang Estate) were invited but none of them attended the meeting. No further engagement process being done for the adjacent stakeholders to communicate on fire prevention and control measures.		
Corrections:	<p>Engagement process has been done to the absent stakeholders. For Mamor estate, the absent stakeholder are Ladang Kekayaan, Ladang Tereh and Smallholder near to PM98E @ Bukit Batu. Meanwhile, for Kahang estate are Zamrud Estate, Sembrong Estate and Ladang Hutan Getah.</p> <p>For the record of engagement process, please refer to the following appendixes</p> <ul style="list-style-type: none"> a. Appendix 1a - Signed Acknowledgement form from Kahang Estate Stakeholders b. Appendix 1b - Picture of Engagement Process Conducted by Kahang Estate c. Appendix 1c - Signed Acknowledgement form from Mamor Estate Stakeholders d. Appendix 1d - Picture of Engagement Process Conducted by Mamor Estate 		
Root Cause Analysis:	There was no mechanism to demonstrate engagement process with adjacent stakeholders on fire prevention and control measures		
Corrective Actions:	<p>Mechanism of engagement with stakeholders and slides for fire prevention and control measures have been established (Appendix 2 and 3). All the related documents was distributed to all operating centres (Appendix 1). The mechanism includes stakeholders who attend stakeholders meeting and others who are unable to attend.</p> <p>When the invited stakeholder is unable to attend, operating centre shall make arrangements to meet the stakeholder and provide the following documents</p> <ul style="list-style-type: none"> 1) Fire prevention and Emergency Response Procedures (Appendix 5), 2) To ensure stakeholder signs the briefing acknowledgement form (Appendix 4) <p>Please refer to the following appendixes:</p> <ul style="list-style-type: none"> a. Appendix 2 – Slides on Fire prevention and control measures by IOI Plantations b. Appendix 3 – Mechanism of engagement with stakeholders for fire prevention and control measures c. Appendix 4 – Fire Prevention and Emergency Response Plan (ERP) Briefing Acknowledgment Form 		

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	d. Appendix 5 – Emergency Response Procedure
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	7.12.2 i) Identification of HCVA to be clearly reported in the HCV assessment carried out by HCVRN trained assessor. Currently the HCVA hectarage combined with self-declared/set-aside conservation area. ii) Signage clearly indicating the HCVA to be clearly marked and erected. Currently the available signage marked as conservation area.
OFI 2	2.1.1 Based on mill's compliance schedule, monitoring of upstream and downstream of Sg Sembrong shall be carried out on monthly basis. Standard reference used is Class III of NWQS as referred to the monthly report by the appointed consultant. Off-limit results reported especially for one (1) of the sampling point in the upstream of Sg Sembrong. Further clarification has yet to be made with DOE on the specific parameter to be referred either based on standard A (EQ Regulation, Sewage and Industrial Effluent 2009) or Class III of NWQS. No clear reference on which discharge standard to be applied as per mill's compliance schedule.

Positive Findings	
PF #	Description
PF 1	<ul style="list-style-type: none"> • Good cooperation with the sustainability and management team. • Good retrieval of records and documents • Maturity of the system can be seen during assessment

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1992177-202011-M1	Date Issued	26/11/2020
Due Date	24/2/2021	Date of nonconformity Closure	11/1/2021
Clause & Category (Critical / Minor)	5.1.6 (Critical)		
Statement of Nonconformity:	There is no time frame for payment is stated in the contract document.		
Requirement Reference:	Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.		

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Objective Evidence:	Invoice No IV-2008-0004 dated 21 August 2020 for the sum of RM116, 822.52 contains a 30-day term of payment. However, this amount remains unpaid as of the date of audit.
Corrections:	The estate has highlighted this issue to Top Management and they are expediting the payment process. The pending payment is expected to be made by 08/01/2021.
Root Cause Analysis:	Contracts issued by certification unit to contractors (which is different from the contracts issued by HQ) include a time frame for payment However, IOI HQ uses a separate contract which does not include a time frame for payment as mentioned in the NCR.
Corrective Actions:	To avoid payment delay in future: HQ shall negotiate for a longer time frame for payment and include these terms in contracts especially for large projects; O.Cs shall try to estimate the correct amount when budgeting for all future contracts O.Cs shall immediately arrange for the difference if the tender award amount is above the estate's budgeted amount; O.Cs shall request Additional Vote for the non-budgeted amount and ensure that the payment is made within the agreed time frame
Assessment Conclusion:	ASA2_2 verification: During the surveillance audit, contracts, invoices and payment vouchers were sighted as follows: Contracts between Pamol Kluang Mill and POME/EFB transporters, namely Ramachandran a/l Nadesan and Lee Yee Cheng. Both contracts were dated 16 October 2021, valid for one year. All the above contracts state clearly that payments are to be made within 30 days of receipt of invoice. Evidence was available that payments were made to the respective contractors within the agreed 30-day period based on invoices sent by the contractors dated 30 Sept 2021, and payments made via payment vouchers issued on 16 October 2021 for the full amount invoiced. No recurrence of issue recorded, hence the previous major NC is remain closed

Non-conformity			
NCR Ref #	1992177-202011-M2	Date Issued	26/11/2020
Due Date	24/2/2021	Date of nonconformity Closure	11/1/2021
Clause & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	The management did not comply with the Employment Act 1955 where the limit of overtime for the worker has exceeded 104 hours.		
Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		

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Objective Evidence:	<p>Unijaya Estate:</p> <p>Sampled one of the workers' payslips and overtime records (Employee No: 1PPP/IOI/1115/764 - harvesting mandore) for June 2020 and October 2020 found that his overtime hours have exceeded the maximum limit of 104 hours without the approval from authority.</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Month</th> <th>Hours of overtime</th> </tr> </thead> <tbody> <tr> <td>June 2020</td> <td>112.5</td> </tr> <tr> <td>October 2020</td> <td>109</td> </tr> </tbody> </table>	Month	Hours of overtime	June 2020	112.5	October 2020	109
Month	Hours of overtime						
June 2020	112.5						
October 2020	109						
Corrections:	As the supervisor failed to monitor the overtime hours of the harvesting mandore, the management issued a letter to the supervisor to remind him to monitor the working and overtime hours of all his workers.						
Root Cause Analysis:	The management of Unijaya estate failed to monitor the limit of overtime as per the Employment Act as they did not have a monitoring system to help them to check and ensure that the overtime hours do not exceed 104 hours. The payroll clerk who was previously checking and monitoring OT hours was transferred to the SAP regional office.						
Corrective Actions:	The management has instructed the payroll clerk to key in details of overtime hours in the SAP system every next day. The payroll clerk is to alert management if any worker has reached 90 overtime hours in a month. Supervisors are reminded to monitor and ensure that any extra work be offered to other workers so that no worker exceeds 104 overtime hours in a month						
Assessment Conclusion:	<p>ASA2_2 verification:</p> <p>Sighted the overtime records (Jan, May, August 2021) as follows: Kluang Palm Oil Mill: boilermen, weighbridge operator, auxiliary policeman and ramp attendant Mamor Estate: harvesting mandore & checker Kahang Estate: loose fruit mandore</p> <p>Evidence was available that none of the above workers' overtime exceeded 5 hours per day, or 104 hours per month. Their monthly overtime hours are being monitored by the respective payroll clerks. Sighted also the work verification form which details out the workers' activity code, block he worked, time work started, time work finished, overtime hours worked for the day and workers' signatures as acknowledgement. This document is used as part of the certification unit's system to monitor the overtime hours for the day and month</p> <p>No recurrence of issue recorded, hence the previous major NC is remain closed</p>						

Non-conformity			
NCR Ref #	1992177-202011-M3	Date Issued	26/11/2020
Due Date	25/2/2021	Date of nonconformity Closure	11/1/2021
Clause & Category (Critical / Minor)	6.2.4 (Critical)		
Statement of Nonconformity:	The line site inspection was not carried out effectively.		

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Requirement Reference:	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure
Objective Evidence:	<p>Hospital Assistant of Pamol Kluang POM has conducted linesite inspection on weekly basis and the last round of inspection was conducted on 21/11/2020 using the Monitoring Checklist – Linesite. As seen in the checklist found that all the condition of the housing area was satisfied and in good condition such as good flow of water and clean compound. However, during site visit to the linesite found the following issues:</p> <ol style="list-style-type: none"> a. The houses are not kept in a good state of repair. Houses had missing window panes and rotting doors. b. The area surrounding the workers’ housing are not maintained in a clean and sanitary condition. c. The drains behind houses No. 18 and No. 10 contain food debris and undergrowth which does not permit the free flow of water. <p>House No. 18 had an extension that was leaning unsafely to one side. This has shown that the inspection was not carried out effectively.</p>
Corrections:	As it was found that the outgoing hospital assistant (HA) was not really doing proper linesite inspection, the mill decided to fast track the transition of HAs. The new HA has been requested to carry out a proper linesite inspection together with Pamol Kluang Mill social liaison officer on 05th December 2020. They are to present the findings to management to make a plan for to repair/ replacement/ cleaning.
Root Cause Analysis:	As the present linesite inspection form did not include columns for action taken, status and acknowledgement by management, problems at linesite was not adequately addressed.
Corrective Actions:	The linesite inspection form is revised to include columns for action taken, status and acknowledgement by management. This new form is distributed to all operating centers.
Assessment Conclusion:	<p>ASA2_2 verification:</p> <p>During the surveillance audit, it was found that the houses are generally kept in good condition with relatively clean and flowing drains, and grass maintained and kept short. Although the line site houses are aged, management has initiated and obtained the necessary budgets to upgrade and refurbish the houses. Sighted the approved Capex for 2020/2021 and 2021/2022 at Kluang Palm Oil Mill, Kahang Estate and Mamor Estate.</p> <p>The housing inspection records, in particular the one maintained by the Pamol Kluang Mill contain good details of conditions of the line site, actions taken by management to adequately address any concerns, and acknowledged by the management. No recurrence of issue recorded, hence the previous major NC is remain closed</p>

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Non-conformity			
NCR Ref #	1992177-202011-N1	Date Issued	26/11/2020
Due Date	26/11/2022	Date of nonconformity Closure	26/11/2021
Clause & Category (Critical / Minor)	2.1.2 (non-critical)		
Statement of Nonconformity:	The monitoring of changes to the permit requirement was not effectively implemented.		
Requirement Reference:	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
Objective Evidence:	<p>Unijaya Estate</p> <p>The estate has acquired 'Permit "Kebenaran menggunakan Bekalan Air Persendirian" from labour Department as per permit no. TK(NJ).KG/43 dated 22/9/2019. In the permit stated that the estate shall obtain water quality analysis report at minimum of once per 3 months.</p> <p>However, the estate on conducted the domestic water quality analysis once a year for 2019 as per report reference no. ENV/WTR/UJE/175 in July 2019. For 2020, the domestic water quality analysis was conducted on 3/11/2020, however the report has yet to receive by the estate.</p> <p>The water quality analysis conducted was not follow the requirement as stated in the permit. These shows that the monitoring of changes to the permit requirement was not effectively implemented.</p> <p>Pamol Kluang POM</p> <p>The Atlas Copco Unfired Pressure Vessel (air compressor) has not been registered with DOSH while it has been used / operated in the biogas plant. This was against Factories Machinery Act 1967 regulation.</p>		
Corrections:	<p>Unijaya Estate</p> <p>Estate shall hire a new sustainability staff to assist the new Environment Liaison Officer in sustainability matters. This staff shall also assist in the monitoring and implementation of changes to the permit requirements especially the domestic water quality analysis.</p> <p>Pamol Kluang POM</p> <p>Pamol Kluang Mill has submitted documents to register The Atlas Copco Unfired Pressure Vessel (air compressor) with DOSH through myKPP system on 02/12/2020</p>		
Root Cause Analysis:	<p>Unijaya Estate</p> <p>Due to lack of experienced personnel and sustainability staff, the estate could not conduct more thorough checking and monitoring of legal requirements. This was amplified by the fact that the person in charge of monitoring the permit requirements left the estate in September 2020 without proper handover of duties to his successor. Unijaya estate also did not have a sustainability staff since October 2019. They have failed to hire a replacement due to lack of accommodation in the estate.</p>		

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	<p>Pamol Kluang POM</p> <p>The legal liaison officer who is responsible to monitor the legal compliance in mill did not register the Atlas Copco Unfired Pressure Vessel (air compressor) which was used/operated in the biogas plant with DOSH as the system was still in the commissioning stage and not handed over officially to the mill by the Contractor.</p> <p>The management also failed to request a copy of the Hydrostatic test (JKJ 127) form of the Unfired Pressure Vessel (JKJ 127) from the contractor though it was available.</p>
Corrective Actions:	<p>Unijaya Estate</p> <p>The sustainability internal audit checklist and annual sustainability program shall be revised according to the conditions stated in the permits to ensure proper implementation.</p> <p>Pamol Kluang POM</p> <p>Legal liaison officer shall ensure that all personnel, equipment and machinery for carrying out work in the premises comply with legal requirements before commencing work inside the premises.</p> <p>They are to use the attached checklist to check and ensure that all machinery are valid.</p> <p>The additional requirements for contractors and service providers shall be revised to include conditions that all personnel, equipment and machinery that require competency certificates are available and valid.</p>
Assessment Conclusion:	<p>ASA2_2 verification:</p> <p>Internal audit checklist and programme has been revised to include approval conditions in the permit obtained. Refer to internal audit report dated 7/10/21 and 10/11/21. The following approvals from DOSH for POM have been obtained and kept on record.</p> <ol style="list-style-type: none"> 1) PTI from DOSH dated 8/11/2021 (Approval Ref. No. JH/20/PTI/54511) 2) Initial permit for Atlas Copco Air Compressor JH PMT 90498 dated 5/10/2021 <p>Implementation of corrective action taken was found to be adequate. The previous minor NC is closed effectively on 26/11/21. Continuous implementation will be further verified in the next assessment.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: Nil</p> <p>Verification / Follow-up actions:</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1852239-201911-M1	Major	2.1.1	29/11/2019	Closed on 28/02/2020
1992177-202011-M1	Major	5.1.6	26/11/2020	Closed on 11/01/2021
1992177-202011-M2	Major	6.2.3	26/11/2020	Closed on 11/01/2021
1992177-202011-M3	Major	6.2.4	26/11/2020	Closed on 11/01/2021
1992177-202011-N1	Minor	2.1.2	26/11/2020	Closed on 26/11/2021
2130109-202111-M1	Major	7.10.3	26/11/2021	Closed on 23/02/2022
2130109-202111-N1	Minor	7.11.3	26/11/2021	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss *Pamol Kluang POM* Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
External/Communities	JAKOA	Phone interview
Government Department	Dept of Wildlife and National Parks (Perhilitan) Kluang	Phone interview
Contractor	Yew Tan Enterprise	Phone interview

Stakeholders comment	
1	<p>Feedbacks: JAKOA Kluang informed that there have been no issues between IOI Pamol certification unit with the Orang Asli communities. There has also been no issue of overlapping customary land claim involving the parties.</p> <p>Audit Team verification and response: Noted the comments from JAKOA Kluang. No further issue of concern.</p>

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2	<p>Feedbacks: Dept of Wildlife and National Parks (Perhilitan) Kluang confirmed that there are no issues of concern with the oil palm estate and milling operations of IOI Pamol Kluang. Any wildlife incidences usually involve the migration of elephants and so far these have been managed well by the certification unit.</p>
	<p>Audit Team verification and response: Noted the comments from Perhilitan Kluang. No further issue of concern.</p>
3	<p>Feedbacks: EFB/POME, CPO and PKO, transporters state that contracts entered into with Pamol Mill, Kahang Estate and Mamor Estate are fair and transparent. Payments are received promptly, i.e., within one month of invoice. Good relationship with Pamol Mill and both Kahang and Mamor estates. Contractors are aware of IOI Policies including legal compliance, no child labour, anti-corruption and bribery. They are also aware of the grievance channels.</p>
	<p>Audit Team verification and response: All the sampled contractors have valid contracts with Pamol Mill and payments are made within the agreed timeframe mentioned in the contract. No further issue of concern.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Pamol Plantations Sdn. Bhd. (Unilever Group)	2003	11,673.27	Yes	No	Yes, ownership changed due to estate bought over by IOI Corporation Berhad on 17/01/2003

Previous land owner / user comment – not applicable	
	<p>Feedbacks:</p>
	<p>Audit Team verification and response:</p>

3.5 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that IOI Pamol Kluang POM certification unit 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 IOI Pamol Kluang POM certification unit is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: RAVI TONY
Company Name: BSI Services (M) Sdn Bhd	Company Name:
Title: Lead Auditor	Title: SENIOR MANAGER
<p>Signature:</p> 	<p>Signature:</p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  <p>RAVI TONY Senior Manager Sustainability, Safety, Health & Environment (Peninsular) IOI Plantation Services Sdn Bhd</p>
Date: 7th March 2022	Date: 4/4/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Behave ethically and transparently		
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>The Pamol Kluang certification unit is able to demonstrate that documents specified in the RSPO P&C are made available to the public. The publicly available documents are available at the office notice board at Mill and every estate, and inside the office which can be assessed by stakeholders if they wish to. These include documents related to environmental, social and legal issues such as:</p> <ul style="list-style-type: none"> • Company policies, including Sustainable Policy which contains policy on protection of human rights defenders, • Land titles • High Conservation Value and High Biodiversity Value document summaries • Details of complaints and grievances • Negotiation procedures • Business unit organizational structure • Public summary of certification assessment report • Negotiation procedures • Meeting of minutes with stakeholders, safety and welfare committee meetings • Continuous improvement plans 	Complied

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		<p>The company policies are also shared with the stakeholders during stakeholder meetings held as follows:</p> <ul style="list-style-type: none"> - Pamol Mill internal stakeholder meeting (22 July 2021), external stakeholder meeting (28 October 2021), - Mamor estate external stakeholder meeting (28 October 2021) and internal stakeholder meeting (3 November 2021). 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the company policies are available in dual language, i.e., Bahasa Malaysia and English. Information requested by government department stakeholders are prepared in Bahasa Malaysia. Refer to Indicator 1.1.3 below.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Records of requests for information and responses are duly maintained and verified during the surveillance audit. Reviewed were requests for information and the responses:</p> <ul style="list-style-type: none"> - Request for information by Kluang Branch of Department of Environment Johor on black smoke discharge, EFB disposal record, and effluent flowmeter. The responses were provided by the Pamol Kluang Mill to the Department of Environment on 11 Nov 2021. <p>Request for report on cessation of foreign workers employment was provided to the Kluang Labour Office on 16 Nov 2021.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The consultation and communication procedures are documented under the IOI Group Plantation Division Group Social Impact Assessment & Management Action Plans (Guidance Document) for period 2019 – 2024, and approved by the Plantation Director dated March 2019.</p> <p>This procedure was disclosed and made available to relevant stakeholders as follows:</p>	Complied

		- Pamol Mill internal stakeholder meeting (22 July 2021), external stakeholder meeting (28 October 2021), Mamor estate external stakeholder meeting (28 October 2021) and internal stakeholder meeting (3 November 2021).	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Each unit within Pamol Kluang Mill and its supply bases have their own list of stakeholders. The stakeholders comprise relevant government agencies such as the Labour Department, Immigration Department, Department of Environment, Department of Safety and Health, India High Commissioner, Bangladesh High Commissioner, Nepal and Indonesian Embassies, etc. Also included are neighbouring estates, neighbouring villages, schools, canteen/shop operators, suppliers, contractors, etc. Contact details for each stakeholder and their nominated representatives are also available.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	A Policy known as 'Code of Business Conduct & Ethics' June 2020 is available which was sighted and verified during the audit. Among others, this Policy calls for: <ul style="list-style-type: none"> • Dealing fairly with customers, suppliers, contractors, competitors and other employees; • Avoid situations of conflict of interests between personal interest and interests of the Company; • Not to be influenced by receiving favours, and not to influence by giving favours; • Not to accept any kinds of bribes or kickbacks or other unlawful or unethical benefits. This Policy is available on the IOI Plantation website (www.ioigroup.com) and shared with internal and external stakeholders. Socialisation of the Policy was done via posters	Complied

		<p>publicly displayed within the Pamol Mill and its supply bases, as well as during Policy briefings given to workers as follows:</p> <ul style="list-style-type: none"> - Pamol Mill internal stakeholder meeting (22 July 2021), external stakeholder meeting (28 October 2021), - Mamor estate external stakeholder meeting (28 October 2021) and internal stakeholder meeting (3 November 2021). <p>Also sighted were agreements entered into with various parties. Sampled during the audit were:</p> <ul style="list-style-type: none"> - Agreement dated 1 July 2021 between Mamor Estate and Tea & T Estate Contractor for loading and transport FFB to estate ramp. - Agreement dated 1 July 2021 between Perusahaan Mekassar (M) Sdn Bhd (Kahang Estate) and Jayakumar Maju Jaya Enterprise. - Agreement dated 1 July 2021 between Pamol Plantations Sdn Bhd (Pamol Mill) and Lee Yee Cheng for EFB & POME transport; - Agreement with with Rama Plantation and Transportation dated 1 July 2021. <p>These contracts contain pledges to comply with anti-bribery and anti-corruption and avoid conflict of interest situations.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Among the system in place include annual internal audits conducted on 10 Nov 2021 (Pamol Kluang Mill) and on 7 October 2021 (Kahang Estate).</p>	Complied
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			

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<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>The CU continued to monitor compliance to the established Legal Register. Latest update sighted complied is Emergency (Prevention and Control of Infectious Disease (Amendment) Ordinance 2021. Revision dated 6/3/2021</p> <p>Sampled the following documents:</p> <p><u>Pamol Kluang POM</u></p> <ol style="list-style-type: none"> 1) Energy commission license serial #005983/2017, installation No. ST (SJB) P/S/JHR/00128 for 3400 kW valid until 10/08/2021. 2) MPOB license 500040104000 dated 01/04/2021 until 31/03/2022 for total of 288,000 mt FFB. 3) Fire Certificate No. 17/2019 valid through 21.01.2022 4) Diesel storage license ref #BPGK/JH (KLU)0273 SK for 18,000 liter valid expiring till 25/03/2022. 5) Energy Commission License for Private Installation of 3400kw electricity supply expiry date 9.8.2022. 6) CePSWaM, Asst. Mill Manager bearing Certificate No. CePSWaM/03617 7) Steam Engineer, Mill Manager, Grade 1 to cover largest boiler heating surface area 1586 m2 8) 4 Boilerman Grade 2 available 9) Sent JKPP 8 to DOSH on 12.1.2021 Ref. JKPP/46246/2020 10) Environment Quality Act 1974, under section 18(1), Pamol Palm Oil Mill's Compliance schedule, no. license 004723 (no. file AS(B)J31/152/000/048 valid from 1/7/21 – 30/6/2022 <ul style="list-style-type: none"> - Discharge method: land application - Processing limit: 60 mt/hr 	<p>Complied</p>
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		<ul style="list-style-type: none"> - Limit for final discharge: BOD3 < 100 mg/l - River water sampling, upstream and downstream of Sg Sembrong (monthly) - 3rd party audit (twice per year May and December) by DOE’s registered environmental auditor. <p>11) Contravene of license (CL), under section 22(1) of EQA 1974, Clean Air Regulation 2014, ref: AS (B) J31/152/000/048 Jld. 9 (1) dated 31/5/21, license no. 005349. The license is valid from 6/6/21 – 31/12/21. License conditions as per the following:</p> <ul style="list-style-type: none"> - Limit of emission for stack no.1: 390 mg/m3 - Limit of emission for stack no.2: 170 mg/m3 - Ringelmann Chart < 2 (opacity) - Weekly performance monitoring via I-remote (Integrated Monitoring Enforcement) upload and submitted every month - Particulate matter and opacity measurement via CEMS. <p>12) Clause 25 of compliance schedule, no. license 004723 for 3rd party audit (minimum of twice per year) by DOE’s registered environmental auditor; EA:0087 CESSWI:3529 and EA:0112 CESSWI:3766. Report dated 27/7/21 was made available for verification. 3 OBS reported and no non-compliance issue raised.</p> <p><u>Kahang Estate</u> Kahang Estate identified 47 legal requirements as applicable to it. Among them were:</p> <ol style="list-style-type: none"> 1. MPOB-licence no 50216532000 to sell and move FFB validity period 1.2.2021 – 31.1.2022 2. Diesel permit ref. no.: BPGK JH (KLU)2154 SK, serial no.: 	
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		<p>J025288 capacity 18,090 litres valid until 19/7/2022</p> <ol style="list-style-type: none"> 3. Industrial Code of Practice for Confined Space 2010 4. Children and Young Persons (Employment) Act 1966. <p><u>Mamor Estate</u></p> <p>Mamor Estate too identified 47 legal requirements as applicable to it. Among them were:</p> <ol style="list-style-type: none"> 1. MPOB license no.: 511691002000 (validity period 1/4/2021 - 31/3/2022) 2. Permit to store diesel 15,000 liters ref. no.: BPKG JH(KLU) 1967SK; serial no.: J027596 (validity period 18/11/2020 – 17/11/2021) being renewed through BLESS. There is delay in approval by KPDNKK due to pandemic Covid-19 3. River water extraction license letter ref. no.: SUKJ.BAKAJ:334/300/05/07/07/3 (validity period until 31/12/2021) by Director of Water Resources Johor 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The Certification Unit continued to use their established Legal Requirement Register to ensure all legal compliance are in place. It involves the following process:</p> <ul style="list-style-type: none"> • It is periodically reviewed by the nominated Mill/Estate Assistant Manager with guidance from the Peninsular Malaysia Sustainability, Safety and Health Department to ensure changes in law are updated, compliance met and non-compliance are mitigated. • The respective mill and estate Manager has assigned one executive as PIC responsible for compliance assurance and tracking changes in regulatory requirement. • Annually, an RSPO Internal Audit is conducted Lead by Manager Sustainability, Safety and Health and assisted by Mill / Estate Manager independent of the Certification unit being 	Complied

		<p>audited) to determine compliance of operations with legal requirements. Audit records were sighted maintained.</p> <ul style="list-style-type: none"> • A system established to track changes in laws/regulations and be kept informed are through the following means; <ol style="list-style-type: none"> a) Subscribed to Lexis-Nexis Malaysia b) News release through daily newspaper. c) Internet (e-federal gazette, www.e-warta.com.my) d) Law change tracked by book publisher (MDC Book Publications). e) Circulars from relevant association (e.g. MPOA, MPOB, MAPA/NUPW) 	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Kahang Estate boundary pegs were sighted clearly demarcated and visibly maintained at neighbours with Sembrong Estate at PM05C and Seong Thye Estate at PM01B and PM04B.</p> <p>Likewise boundary pegs were sighted at border of Mamor Estate block PM08C, PM06A with Tereh Estate belonging to Kulim (M) Bhd. Verified during field visit, there was no planting beyond legal boundary sighted.</p>	Complied
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of contracted parties are available and duly maintained. Reviewed during the audit were the list contains names and contact details of the contractors and this information are available in the stakeholders' list.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p>	<p>All contracts sampled during the audit contain a clause that commits to compliance with legal requirements. Clauses 5 and 6 of each contract commits to compliance with legal requirements such as having valid road taxes, insurance policies, drivers possessing valid driving licences, compliance with the Malaysian Occupational,</p>	Complied

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	<p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Safety and Health Act 1994, Factory & Machinery Act 1967, Environmental Laws, etc.</p> <p>Clause 1 of the Additional Requirements for Contractors and Service Providers confirms that the contractors are aware and comply with applicable local, national, international laws and regulations, legal requirements such as valid passports, work permits, identity cards for locals. This also includes signing of employment contracts with their worker, paying minimum wages, employing workers 18 years and above, no sexual harassment, no contract substitution, payment of insurance coverage, etc. Sighted during the audit were the following contracts:</p> <ul style="list-style-type: none"> a. Mill Agreement between Pamol Plantations Sdn Bhd (Pamol Mill) and Lee Yee Cheng for EFB & POME transport from Pamol Mill to estate fields dated 1 July 2021. b. Agreement for transport of CPO dated 1 Sept 2021 with YewTan Enterprise from 1 Sept 2021 to 30 June 2024. c. Kahang Estate: Transportation and loading FFB contract dated 1 July 2021 between Perusahaan Mekassar (M) Sdn Bhd (Kahang Estate) and Jayakumar Maju Jaya Enterprise. d. Contract Mamor Estate and Tea & T Estate Contractor dated 1 July 2021 for loading and transport FFB to estate ramp. 	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>All sampled contracts with contractors contain a provision that contractors and service providers are aware and will not engage in child, forced and trafficked labour. This provision is available under Clause 1(d) of Additional Requirements for Contractors which was signed and acknowledged by the respective contractors. The sampled contracts were as follows:</p>	Complied

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		<ul style="list-style-type: none"> a. Mill Agreement between Pamol Plantations Sdn Bhd (Pamol Mill) and Lee Yee Cheng for EFB & POME transport from Pamol Mill to estate fields dated 1 July 2021. b. Agreement for transport of CPO dated 1 Sept 2021 with YewTan Enterprise from 1 Sept 2021 to 30 June 2024. c. Kahang Estate: Transportation and loading FFB contract dated 1 July 2021 between Perusahaan Mekassar (M) Sdn Bhd (Kahang Estate) and Jayakumar Maju Jaya Enterprise. d. Contract Mamor Estate and Tea & T Estate Contractor dated 1 July 2021 for loading and transport FFB to estate ramp. 	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	The Pamol Kluang Mill processes only FFB from its own group of estates and does not source FFB from other third parties either directly or indirectly. Therefore, this indicator is not applicable.	Not Applicable
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	The Pamol Kluang Mill processes only FFB from its own group of estates and does not source FFB from other third parties either directly or indirectly. Therefore, this indicator is not applicable	Not Applicable
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>There is no Scheme Smallholders at this CU.</p> <p>The CU continued the practice to document its business in the form of annual budget and 5 Years Business Management Plan FY 2021 – 2025. The plan was established as basis for the company and operating units to conduct its business.</p> <p>At Pamol Kluang POM its business plan covers FFB production, CPO, OER, and KER, general charges, mill maintenance, process shift labour, general services, total processing cost, environment, social (workers and staffs welfare), and health and safety component.</p> <p>At the estate Operating units such as Kahang and Mamor, its 5 Year Business Plan included Area Statement, Crop (FFB) by Year of Planting, FFB Monthly Breakdown, 10 Years Replanting Program, Summary Replanting Program by Field, Detail Replanting Program by Field, Executive/Staff and Workers Requirement, Mature Oil Palm Costing Statement. .</p> <p>The estate also included welfare activity for their workers in the budget such as family day, sports and recreational activity.</p>	Complied						
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>At Kahang Estate there is no replanting programme noted in the 5 Years Business Plan and this was confirmed during interview with Estate Manager. However, at Mamor Estate replanting is program to begin in 2022 through FY 2025/26 covering an area of 927 ha.</p>	Complied						
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Management Review Meeting (MRM) are held annually at the audited sites as follows:</p> <table border="1" data-bbox="1137 1262 1930 1393"> <thead> <tr> <th>Operating Unit</th> <th>MRM Held</th> <th>Date Internal audit conducted</th> </tr> </thead> <tbody> <tr> <td>Pamol Kluang POM</td> <td>17.11.2021</td> <td>20.9.2021</td> </tr> </tbody> </table>	Operating Unit	MRM Held	Date Internal audit conducted	Pamol Kluang POM	17.11.2021	20.9.2021	Complied
Operating Unit	MRM Held	Date Internal audit conducted							
Pamol Kluang POM	17.11.2021	20.9.2021							

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		<table border="1"> <tr> <td>Kahang Estate</td> <td>12.11.2021</td> <td>28.9.2021</td> </tr> <tr> <td>Mamor Estate</td> <td>1 & 2 Nov 2021</td> <td>3.10.2021</td> </tr> </table> <p>Sighted an average of almost 95 % of the internal findings raised at all Operating Units have been closed.</p>	Kahang Estate	12.11.2021	28.9.2021	Mamor Estate	1 & 2 Nov 2021	3.10.2021	
Kahang Estate	12.11.2021	28.9.2021							
Mamor Estate	1 & 2 Nov 2021	3.10.2021							
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.									
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	Continuous improvement plans for all operating units for financial year 2021/2021 were documented under Environmental impact assessment management action plans and continuous improvement plans available at all visited operating units. Social and environmental were among pertinent elements covered in the action plan. On top of the established plan, allocation of capital expenditure (CAPEX) for process improvement, social and environmental components were also sighted.	Complied						
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>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.</p> <p>- Minor Compliance -</p>	RSPO metric template version 2.1 is used for the reporting of IOI Pamol POM certification unit's metrics (economic, social and environment). Data reporting period is January to December 2020 for (social and environment metrics) and economic metrics from October 2020 – September 2021 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.	Complied						
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.									

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3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p>	<p>The CU continued to use the established written Standard Operating Procedures for estates and mill. It covers procedures as required by the RSPO P&C MYNI:2019.</p> <p>The company's management process and operations are guided by the following documents:</p> <ol style="list-style-type: none"> 1. Group Standard Operating Procedures (StOP) for Palm Oil Mill Operations dated 01 July 2017; 2. Group Safe Operating Procedures (SaOP) Rev.2 dated 6.1.2020; 3. Group Occupational Safety and Health Guidance for Estate Workers (in Bahasa Malaysia) dated 6.1.2020; 4. Group Standard Operating Procedure (StOPs) for estate date circulate by IOI Plantation Director 30 Sept 2020; 5. Group Social Impact Assessment and Management Action Plans (Guidance Document) updated during September 2021 for 6 estates plus 1 POM; 6. Group Environmental Impact Assessment and Management Action Plans updated November 2021; 7. Internal Audit procedure dated 3 May 2018. 	Complied
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>Continuing current practice, records had been kept by the staff assigned for each operation to monitor the implementation of the procedure and report progress of work. The records were than checked by Assistant, Estate/Mill Manager, Agronomist and Plantation/Mill Advisor regularly.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>At the mill and estates visited, the continuous records monitoring, checked, maintained and documented were apparent. They carry out daily recording and monitoring through field and mill</p>	Complied

		<p>inspection. The monitoring was overseen by all levels of the supervisory personnel. In addition to them, there were regular visits by GM, Plantation Controller, Mill Controller, Safety and Sustainability team, whose purpose varies including monitoring CU performance. The respective CU Management then prepare monthly reports for submission to Head office for screening, comment and feedback for improvement.</p> <p>Examples sighted at estates were:</p> <ul style="list-style-type: none"> • Social and Environmental Aspects Improvement Plan; • Plan to reduce pollution and emissions; • Integrated Pest Management Plan; • Water Management Plan; • Monitor pay & wages to ensure pay in accordance to Labour law. <p>Examples sighted at Pamol Kluang POM were:</p> <ul style="list-style-type: none"> • Water quality; • Safety and environmental performance monitoring; • Mill Processing throughput – FFB processed, OER, KER, CSPO, CSPK, Operating costs; • CAPEX Expenditures. • The records of monitoring and mitigation measures taken over the past 12 months were sighted maintained at each Certification unit 	
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Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.

3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There are no new plantings or new operations within Pamol Kluang Mill and its supply base. Nevertheless, each unit has its own Social Impact Assessments done which have been prepared internally by the Sustainability Department. Details of the Social and Environmental Impact Assessment are contained in Indicator 3.4.2 below.</p>	Complied
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Evidence was available that the Social Impact Assessment (SIA), Social Management Plan and Annual Social Mitigation Plan for Pamol Kluang Mill, Kahang Estate and Mamor Estate have been developed with participation of affected stakeholders such as external (local communities, contractors, suppliers, neighbouring entities, etc) and internal stakeholders (workers). These documents were prepared by each unit in collaboration with Sustainability Team, Peninsular Malaysia. Participation of affected stakeholders were in the form of:</p> <ul style="list-style-type: none"> a. Discussions in various committee meetings such as the Joint Consultative Committees, Women Empowerment Committees, Employee Consultative Committees; b. Internal and external stakeholder meetings; c. Complaints and inputs recorded in the Grievance Books; and d. Action Plan developed following report by Finnwatch. <p>The latest Social Management Plan and Annual Social Mitigation Plan for Pamol Kluang Mill, Kahang Estate and Mamor Estate were developed in November 2021. The documents have identified types of impacts, findings from the assessment, action plan and monitoring, and persons in charge.</p> <p>Among the impacts identified were insufficient labour force due to effect of Covid-19 lockdowns, prices of items sold at the sundry</p>	Complied

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		shops, difficulty in getting particular food item preferred by migrant workers, not getting medical leave when unwell.	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Social Management Plan and Annual Social Mitigation Plan for Pamol Kluang Mill, Kahang Estate and Mamor Estate have been implemented, reviewed and updated annually in a participatory way. The latest reviews for the Pamol Kluang Mill, Kahang Estate and Mamor Estate were carried out in November 2021. Implementation of the Plans were verified when actions are being taken to ensure social impacts raised by stakeholders are being addressed as follows:</p> <ul style="list-style-type: none"> a. Insufficient labour force due to effect of Covid-19 lockdowns. Action taken: more aggressive hiring. b. Prices of items sold at the estate grocery shops. Action taken: regular monitoring of items sold at all estate grocery shops. c. Not getting medical leave when unwell. Action taken: Health Assistants asked to carry out through medical examination, refer to VMO if illness cannot be treated, and to issue medical leave when needed. 	Complied
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>SOPs on the following procedures are documented, made available and sighted during the audit:</p> <ul style="list-style-type: none"> a. Employment procedure for workers (recruitment, selection, hiring) dated 11 August 2020; b. Retirement procedure dated 21 July 2020; c. Termination procedure dated 11 August 2020; d. Absconded foreign workers procedure dated 8 Feb 2021 e. Resignation and repatriation procedure dated 11 August 2020. 	Complied

		Promotion procedure are available in the Employee Handbook. Each employee has a copy of the Employee Handbook for Estate/Mill & Research Centre Executive Staff. It states that promotion of executives is at the sole discretion of the company. These documents are made available to the workers.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	<p>The employment procedures are implemented and records of employment procedures are maintained. Sighted in the sampled Malaysian workers' files the following documents:</p> <ul style="list-style-type: none"> - Job application form - Interview assessment form - Relevant certificates - Copies of identity documents - Job offer letter - Performance appraisal form <p>Sighted were samples for the following Malaysian workers:</p> <ol style="list-style-type: none"> a. Pamol Kluang Mill: Ramp attendant, weighbridge clerk. b. Kahang Estate: Gardener, general worker. c. Mamor Estate: Security staff, general maintenance. <p>There was no evidence of any termination, repatriation or abscondment during the audit year and so this element could not be effectively verified.</p>	Complied
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 -	The CU assessed continued to use the established HIRARC (Hazard Identification, Risk Assessment and Risk Control) procedure. In doing so, the resultant assessed document is a HIRARC Register that has been established. It is developed by the OU assessed as means to identify hazards, analyse and assess	Complied

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		<p>its associated risk and subsequently apply the suitable control measures. DOSH HIRARC Guideline 2008 was used by the IOI Safety & Health Department, Peninsular Malaysia with consultation input from respective OU Assistant Manager (Estate and Mill) to guide them in developing the Register.</p> <p>The HIRARC Register is periodically reviewed and updated. At Pamol POM it was updated on 1/11/2021, Kahang Estate on 11/11/2021 and Mamor Estate on 11/11/2021.</p> <p>In addition to HIRARC. Chemical Health Risk Assessment (CHRA) is also undertaken by engaging DOSH Competent Person, Assessor Registration No. HQ/04/ASS/00/193 to conduct assessment against worker's exposure to hazardous substances during March – April 2019 at these Operating Units. The report sighted at the visited sites remained current and valid.</p> <p>Mitigation plans resulting from the assessment of HIRARC and CHRA were seen documented and implemented.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>OSH Plan for 2021 dated January had been established and implemented at estates and mill assessed. It is being monitored monthly for its effectiveness by the Safety & Health (SH) Senior Manager, head office to ensure commitment that has been laid out in the Safety & Health Policy is translated into action.</p> <p>Briefings to employees on safety policy are made through training and briefing forums. In addition, the CU carried out tool box briefings at muster ground reminding workers regularly to abide to safe work practices. Safety procedures adherence are emphasized to the employees as part of the work culture. Content includes among others to prioritize safety, execute work safely, and adhere all safety rules and regulations and to target zero accident. Safety</p>	<p>Complied</p>

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policy and targets were available on display board printed in both English & Bahasa Malaysia. Among other programs conducted are as below:

No.	Safety and health program at POM	Monitoring Frequency	PIC
1	Safety & Health Committee Meeting	Quarterly	S&H Committee
2	Workplace Inspection	Quarterly	S&H Committee
3	Workers Health Surveillance (Sprayers, Manurers, Drivers, Workshop personnel, Water treatment operators)	Annually	Estate Health Assistant (EHA)
4	Workers Medical Surveillance	before commence work (new workers) and 12-monthly thereafter	Asst. Manager / EHA / Sustainability Supervisor (SS)
5	OSH Policy	Annually	Asst. Manager
6	Firefighting equipment inspection (extinguisher)	Annually	SS / EHA
7	First aid box inspection and replenishment	Monthly	EHA
8	Certificated equipment Renewal from DOSH	Annually	Asst. Manager / SS
9	Induction for new workers (before commencing work)	Immediately upon joining	Asst. Manager / SS

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		10	Personal Protective Equipment Training, Hearing Conservation Program	Annually	Asst. Manager / Supplier	
		11	Audiometric Test, Noise Risk Assessment	Annually	DOSH Registered Assessor	
		12	Competent Person Certificates	Annually	DOSH	
		13	Road maintenance	Annually	Asst. Manager	
		14	Water quality index	Annually	Asst. Manager	
		15	Induction program for new Field Workers	Immediately upon joining	Asst. Manager	
		16	Motorcycle riding	Annually	Asst. Manager	
		17	Please refer to Safety & Health Training conducted at estates and mill in indicator 3.7.2 below for trade related training.		Asst. Manager	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.						
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Noticed documented training program was made available at all assessed Operating Units. Sustainability program that includes aspects of the RSPO P&C was planned before the start of each new year.</p> <p>Records sighting showed all employees and contractors were given training related to their job skills and RSPO P&C MYNI:2019 requirements. The mill management for instance had conducted 24 sessions for OSH training, 1 session for Social, 4 sessions for</p>				Complied

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environment, 2 sessions for traceability and 25 sessions for Standard Operating Procedures. Among the records sampled were:

No.	Training program	Date conducted
1	SaOP Sterilizer station	16/02/2021
2	SaOP Effluent Treatment Plant	06/03/2021
3	SaOP Workshop	07/03/2021
4	Working at height	11/04/202
5	SaOP Laboratory	22/04/2021
6	Contractor RSPO General Awareness	05/05/2021
7	Schedule waste handling	29/07/2021
8	Hearing conversation	22/07/2021
9	First aid	21/08/2021
10	Water quality	25/10/2021

A similar training program sampled at Mamor estate is listed below:

No.	Training program	Date conducted
11	Functions of Safety and Health Committee	26/03/2021
12	Section 24, OSH Act – General Duties of Employees	20/03/2021, 21/09/2021

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	13	SaOP Harvesting	05/06/2021 21/09/2021	
	14	SaOP FFB Buffalo Assisted Evacuation	20/02/2021 21/09/2021	
	15	SaOP Management of Chemical Store and Spill kit	20/02/2021 09/11/2021	
	16	SaOP Rat Baiting	25/03/2021 05/06/2021	
	17	SaOP Driving Tractor	29/07/2021	
	18	SaOP Workshop Safety	21/09/2021	
	19	SaOP Triple Rinsing	05/04/2021 09/11/2021	
	20	SaOP Water Treatment Plant	17/11/2021	
	21	SaOP Chemicals Spraying	20/2/2021 15/06/2021	
	<p>Training on SaOP for individual workstation are not just classroom training but include field/workplace demonstration to ensure workers:</p> <ul style="list-style-type: none"> • wear PPE correctly; • understand the hazards and risk their work activities posed; and hence the need to • follow the recommended mitigation measures; and • recognize any deviations from the stipulated operating criteria may lead to accident to self and fellow workers. 			

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		The effectiveness of training was evaluated during training itself and post training at workplace. Standard Evaluation form were used.										
3.7.2	Records of training are maintained. - Minor Compliance -	Training records are maintained in employee’s individual file as well as well as training subject file. Shown in Tables in Indicator 3.7.1 above are samples of training programs delivered that covered requirements of the RSPO P&C MYNI:2019.	Complied									
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. - Minor Compliance -	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard. A few training sessions were carried out as per the below summary: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Critical task personnel</th> <th style="width: 20%;">Training date</th> <th style="width: 50%;">Remarks</th> </tr> </thead> <tbody> <tr> <td>Security</td> <td>14/10/2021</td> <td>7 attendees Trainer: Assistant Manager</td> </tr> <tr> <td>Weighbridge/ Sustainability clerk/office clerk</td> <td>30/09/2021</td> <td>3 attendees Trainer: Assistant Manager</td> </tr> </tbody> </table>	Critical task personnel	Training date	Remarks	Security	14/10/2021	7 attendees Trainer: Assistant Manager	Weighbridge/ Sustainability clerk/office clerk	30/09/2021	3 attendees Trainer: Assistant Manager	Complied
Critical task personnel	Training date	Remarks										
Security	14/10/2021	7 attendees Trainer: Assistant Manager										
Weighbridge/ Sustainability clerk/office clerk	30/09/2021	3 attendees Trainer: Assistant Manager										
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)												
3.8.1	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	As per SOP established and documented in CSFFB, CSPO & CSPK Traceability System for Estates, Mill, Warehouses and Trading Company, refer document no. RSPO/SOP/COC/4 issue no 1 dated 1/1/2020 stated as follow:	Complied									

	<p>RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>4. Reception of Raw Material</p> <p>4.1. FFB crop (Goods in)</p> <p>4.1.1. IOI's RSPO certified Palm Oil Mills shall only receive crop exclusively from its own RSPO certified estates. The mill shall verify the FFB originates from a certified estate. Non – certified FFB crop must be rejected.</p> <p>The only mill received FFB from sister estate from Pamol Kluang Region. The FFB supplier were listed in FFB Supplier list.</p>	
<p>3.8.2</p>	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Pamol POM is under Identity Preserved. No 3rd party crop received by the mill. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>
<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.</p>	<p>Complied</p>
<p>3.8.4</p>	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Registration of RSPO IT Platform for Pamol POM as per the following: Commodity: Palm Oil PalmTrace member ID: RSPO_PO1000000109 RSPO membership ID: 2-0002-04-000-00</p>	<p>Complied</p>

		<p>Type of business: Oil Mill Supply chain model: Identity Preserved Palm trace license valid until 15/3/2022. Reporting requirements for supply chain verified through RSPO IT platform. Summary of transactions.</p>	
<p>3.8.5</p>	<p>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:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Procedure for supply chain has been established and documented in CSFFB, CSPO & CSPK Traceability System for Estates, Mill, Warehouses and Trading Company, refer document no. RSPO/SOP/COC/4 issue no 1 dated 1/1/2020 and in RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP), refer document no. RSPOSC/SOP/IP/3 revision no. 7 dated 21/9/2020. Among the subjects covered in the procedure are:</p> <ul style="list-style-type: none"> 1. Purpose 2. Scope 3. Supply chains models and requirements 4. Responsibilities 5. Procedure details <ul style="list-style-type: none"> 5.1. Internal audit 5.2. Handling complaints 5.3. Handling non-conformities 5.4. Handling RSPO products 5.5. Downgrading and mass balance traceability 6. Reception of raw material 7. Processing and storage 8. Dispatch of mill produce 9. Records and retention 	<p>Complied</p>

		<p>10. Training 11. Claims 12. Overproduction</p> <p>The estate continuously provide training to all personnel involve in the supply chain system. Latest training was conducted on 20/10/2020.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>As per SOP established and documented in CSFFB, CSPO & CSPK Traceability System for Estates, Mill, Warehouses and Trading Company, refer document no. RSPO/SOP/COC/4 issue no 1 dated 1/1/2020, under section 5.1 internal Audit</p> <p>The last internal audit was carried out on 27-28/9/2021 by SPO team. The coverage of internal audit has included the General Chain of Custody Requirements for the Supply Chain and Module D: Identity Preserved. There were 2 non-conformities raised as a result of the internal audit.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the FFB despatch report is as follows:</p> <ul style="list-style-type: none"> • Estate WB chit no. (342) • Estate’s names (Mamor Estate) • Date of delivery (30/10/21) 	Complied

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		<ul style="list-style-type: none"> • Field No. (field 99A, 05C, 97A, 02B) • Lorry no. BGW7448 • Weight (36.70 mt) • Mill WB ticket: FB190032168 • Estate WB chit no. (68799) • Estate's names (Swee Lam Estate) • Date of delivery (30/10/21) • Field No. (field 00D, 13C and 07D) • Lorry no. JMQ6271 • Weight (34.34 mt) • Mill WB ticket: FB19032181 • Estate WB chit no. (62708) • Estate's names (Unijaya Estate) • Date of delivery (30/10/21) • Field No. (field 10B) • Lorry no. JHS6619 • Weight (16.13 mt) • Mill WB ticket: FB19032160 <p>Traceability Identification: RSPO certified FFB (RSPO 547027)</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil</p>	<p>Pamol POM ensured the required information is available in document form. Sampled of CPO contract: C19854/2105 dated 28/05/21, quantity 800 mt (delivery month – May 2021)</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX 	<p>Complied</p>

	<p>palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> • The name and address of the seller: Pamol POM • The loading or shipment/ delivery date; e.g. 17/6/21 • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) RSPO IP • The quantity of the products delivered; e.g 32.51 mt • Any related transport documentation; e.g. Despatch note e.g. #CP19002107 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 547027 • A unique identification number: palm trace no. TR-031fd098-7e4f • Available in a few forms e.g. DN no., seal no., etc. <p>Pamol POM ensured the required information is available in document form. Sampled of PK contract: C19554/2103 dated 10/3/21, quantity 150 mt (delivery month – March 2021)</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: Pamol POM • The loading or shipment/ delivery date; e.g. 10/3/2021 • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Palm Kernel (PK) RSPO IP • The quantity of the products delivered; e.g. 33.06 mt 	
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		<ul style="list-style-type: none"> • Any related transport documentation; e.g. Despatch note e.g. #PK19000306 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 547027 • A unique identification number: palm trace no. TR-6992534e-c9cc • Available in a few forms e.g. DN no., seal no., etc. 	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Pamol POM have updated procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPOSC/SOP/IP/3 Rev: 07 dated 21/09/2020.</p> <p>Outsourcing only applicable for CPO and PK despatch based on the delivered contract with buyers. Sighted the contract agreement as following;-</p> <p><u>CPO Transporter</u></p> <ul style="list-style-type: none"> - CPO Transport Agreement between Pamol POM and Syarikat Wijaya (Masai) Sdn Bhd dated 01/09/2021 and valid until 30/06/2024 - CPO Transport Agreement between Pamol POM and Teo uan Kwee Sdn Bhd dated 01/09/2021 and valid until 30/06/2024 <p>Under addendum contract (additional requirements for contractors and service providers) and transport policy/guideline in handling of certified sustainable CPO and PK, it has stipulated the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p>	Complied

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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.	Pamol POM has a record of all contact detail for transporter and updated. The record was stated under stakeholder list dated Jan 2021.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No new contractor appointed for the physical handling of RSPO certified oil palm products.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. 	<p>Pamol POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>As per the RSPO Supply Chain – Module: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 2 years’ period. Sampled records of FFB weighbridge tickets and daily production records for last 2 years were still in place for verification.</p> <p>The material and products movement on real-time basis is recorded in “Month End Production Report” for both CPO and PK. The data is summarised in “CPO/PK Mass Balance Calculation (Internal Process & Output for Financial Year XX/YY”. Among the information available in the format is date, FFB processed, OER, CPO amount [opening, produced and closing] and transferred CPO [mill weight, refinery weight].</p>	Complied

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3.8.13	<p>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.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.15	<p>Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Pamol POM has implemented the procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPO SC/SOP/IP/3 Rev: 07 dated 21/09/2020. From the record verification no 3rd party FFB received at in Pamol POM. The FFB source only from supply base own supply base under Pamol POM certification unit.</p>	Complied
3.8.16	<p>Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly.</p>	Complied
3.8.17	<p>Claims</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. IOI Corporation Berhad has obtained</p>	Complied

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	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.	Trademark License from RSPO. The trademark license# is 2-0002-04-100-03 which is valid from 19/12/2019 to 18/12/2021	
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Pamol POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Thus, this indicator is not applicable	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	No off-product claim made by Pamol POM as to date.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No off-product claim made by Pamol POM as to date.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	No off-product claim made by Pamol POM as to date.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Pamol POM as verified through documentations and websites.	Complied

Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO/PK RSPO IP) and RSPO certificate number; RSPO 547027.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Pamol POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made by Pamol POM and only producing crude and unfinished product. This is not applicable for Pamol POM	Not Applicable

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

	<p>ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Pamol POM is producing crude palm product and containing 100% oil palm content</p>	<p>Complied</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Pamol POM is producing crude palm product and containing 100% oil palm content</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Pamol POM is producing crude palm product and containing 100% oil palm content</p>	<p>Complied</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack 	<p>Pamol POM is producing crude palm product and does not involved in any labelling of end product</p>	<p>Complied</p>

	communications, the RSPO trademark can be printed anywhere on the pack.		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	Pamol POM is producing crude palm product and does not involved in any labelling of end product	Complied
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	The Policy to respect human rights is contained in IOI Group’s Sustainable Palm Oil Policy revised in October 2020. This Policy states that the Company respects and uphold the rights of all workers, including contract, temporary and migrant workers as well as protecting human rights defenders against threats and retaliation in accordance with the following:	Complied

	- Critical (Major) compliance -	<p>a. Universal Declaration of Human Rights b. International Labour Organization’s core conventions c. United Nations Guiding Principles on Business and Human Rights d. Principles of Free and Fair Labour in Palm Oil Production.</p> <p>The Policy was communicated to stakeholders during stakeholder meetings as follows:</p> <ul style="list-style-type: none"> - Pamol Mill internal stakeholder meeting (22 July 2021), external stakeholder meeting (28 October 2021), - Mamor estate external stakeholder meeting (28 October 2021) and internal stakeholder meeting (3 November 2021). 	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>There is no evidence of any use of violence or the instigation of violence within the Pamol Kluang Mill and its supply base. This was further verified during interviews held with external stakeholders and security personnel.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Mill and its supply base are bound by IOI’s Standard “Grievance Procedure (Section 7.0)”.</p> <p>The grievance procedure includes the mechanism of receiving, recording and addressing any complaints/grievances from affected parties. The procedure states that response would be given within 24 hours, which would be followed by preliminary investigation within 30 working days from grievance submission date. If the complaint remains unresolved, parties go to Stage 3 where further investigation/meeting with complainant would be held within 10 working days after preliminary investigation outcome. If matter remains unresolved, it would be escalated to the Group Head Sustainability.</p>	Complied

		<p>IOI Group also adopts the United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labour in Palm Oil Production. Part of this document affirms that the legitimate and peaceful activities of Human Rights Defenders are not obstructed.</p> <p>Whistle blowers are protected under the IOI Group’s Whistle Blowing Policy (Revised October 2019). The Policy ensures anonymity of complainants or whistle blowers.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>One of the procedures in place to ensure the grievance system is understood by affected parties is by providing verbal awareness briefings, and where necessary, a translator is engaged to assist with translations and understanding.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Every unit within the Pamol Kluang Mill and its supply base keep a Grievance/Complaints Book (also known as Green Book) which is readily accessible at the office and can be filled in by workers, staff and external stakeholders. Based on the entries in the Green Book, evidence was available that grievances were acted upon in a timely an appropriate manner.</p> <p>At Pamol Kluang Mill:</p> <ul style="list-style-type: none"> - A worker who had diabetes had hypertension suffered from leg sores due to heavy work boots. This was recorded on 12 July 2021, and a new and lighter safety boots were bought on 16 July 2021 to alleviate his condition. - Requests to repair broken drain at the linesite on 2 Feb 2021 was acted upon on 25 Feb 2021, and acknowledged by the complainant. The slight delay was reasonable as the Mill had to obtain several price quotations. 	Complied

		<p>At Kahang Estate: Complaint of broken toilet was received via the Green Book on 23 Sept 2021, and action was taken to repair the same on 26 Sept 2021.</p> <p>At Mamor Estate: Complaint related to water supply issues was received via the Green book on 9 June 2021. The matter was acted upon and rectified on 12 June 2021.</p> <p>Records showed that the complainants were informed of the status of repair works carried out, and this was acknowledged by the complainants.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The conflict resolution mechanism is contained in IOI Corporation Berhad Grievance Procedure (Doc Ref.: IOI/P/GP/001 Rev No. 1 Rev Date 20 Jan 2020). This procedure allows aggrieved parties to have access to information, advice and expertise.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Among the contributions to community development include providing job opportunities to suitable local communities, and extending medical services to the local communities such as teachers and pupils nearby.</p> <p>Pamol Kluang also allowed outside Hindu worshippers (non-workers) to use the temple located within the premises.</p>	Complied
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Below are the details of legal land ownership:</p> <p>1. Pamol Palm Oil Mill</p> <p>The Pamol Kluang Mill is located within the land title of Pamol Timur Estate under land title No. 88881.</p>	Complied

		<p>2. Kahang Estate Total hectarage: 2,419.9 ha Land title No. HS(D) 8577 No P.T. PTD 3302: Owner: Industrial Oxygen Incorporated Berhad.</p> <p>3. Mamor Estate Total hectarage: 2,225.47 ha Land title No. HS(D) 23794 No P.T. PTD 3226: Owner: Pamol Plantation Sdn Bhd</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no evidence of any use local community land that requires negotiations or agreements detailing FPIC processes. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	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 -	There is no evidence of any local community land that requires discussions or involve consents of affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal	There is no evidence of any local community land that requires local communities' acceptance. Details of the land historical ownership	Not Applicable

	status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	are as per Indicator 4.4.1 above. Therefore, this indicator 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 -	There is no evidence of any local community land that requires maps of appropriate scale showing extent of recognised legal, customary or user rights affected local communities. Therefore, this indicator is not applicable.	Not Applicable
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 -	All available relevant documents are as per details in Indicator 4.4.1 above. There is no land conflict involved and no proposed benefit sharing nor legal arrangements.	Not Applicable
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There is no evidence of any local community land involved and so this indicator is not applicable.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no evidence of any local community land involved and so this indicator is not applicable.	Not Applicable
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. No other legal, customary or user rights is available.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable

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

	- Minor compliance -		
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. - Minor compliance -	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new planting within Pamol Kluang certification unit and therefore, this Indicator is not applicable.	Not Applicable
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	The procedure for identifying legal, customary or user rights, and procedure for identifying people entitled to compensation are available the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The procedure for calculating and distributing fair compensation (monetary or otherwise) is available the Grievance Procedure For Land Owners. Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable

	- Minor compliance -		
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 -	The procedure for identifying people entitled to compensation is available in the Grievance Procedure For Land Owners.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	The procedure for calculating and distributing fair compensation (monetary or otherwise) is available in the Grievance Procedure For Land Owners.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
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	Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable

	certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Based on documentation review and interviews conducted with local communities, there is no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. Therefore, this Indicator is not applicable.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable

5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Pamol Kluang Mill and its supply base were able to demonstrate that contracts entered into with contractors are fair, legal and transparent and have an agreed timeframe. The contracts also contain description of the services provided by the contractor, the amount payable, timeframe for payment, termination clause, rights and obligations of both parties, etc. Sampled during the audit were the following:</p> <ol style="list-style-type: none"> 1. Mill Agreement between Pamol Plantations Sdn Bhd (Pamol Mill) and Lee Yee Cheng for EFB & POME transport from Pamol Mill to estate fields dated 1 July 2021. 2. Agreement for transport of CPO dated 1 Sept 2021 with YewTan Enterprise from 1 Sept 2021 to 30 June 2024. 3. Kahang Estate: Transportation and loading FFB contract dated 1 July 2021 between Perusahaan Mekassar (M) Sdn Bhd (Kahang Estate) and Jayakumar Maju Jaya Enterprise. 4. Contract Mamor Estate and Tea & T Estate Contractor dated 1 July 2021 for loading and transport FFB to estate ramp. <p>Interviews with sampled contractors also confirmed that the contracts are fair, legal and transparent.</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p>	<p>Based on the following invoices and payment vouchers, evidence was available that agreed payments have been made to contractors</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>in a timely manner with details of amount paid given. Sampled were the following: Contracts between Pamol Kluang Mill and POME/EFB transporters, namely Ramachandran a/l Nadesan and Lee Yee Cheng. Both contracts were dated 16 October 2021, valid for one year. All the above contracts state clearly that payments are to be made within 30 days of receipt of invoice. Evidence was available that payments were made to the respective contractors within the agreed 30-day period based on invoices sent by the contractors dated 30 Sept 2021, and payments made via payment vouchers issued on 16 October 2021 for the full amount invoiced.</p>	
<p>5.1.7</p>	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -</p>	<p>Evidence was available that the weighbridges at the Pamol Kluang Mill is being calibrated annually by an independent third party, Metrology Corporation Malaysia Sdn Bhd. Details are as follows:</p> <p>Weighbridge 1 Date of calibration: 10 July 2021 Certificate No: 204102 Make: XK-3190 Series No: 6039 Calibration certificate valid until: 9 July 2022</p> <p>Weighbridge 2 Date of calibration: 10 July 2021 Certificate No: 204100 Make: IND 780 Series No: B444206682</p>	<p>Complied</p>

		Calibration certificate valid until: 9 July 2022	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Pamol Kluang Mill is an Identity Preserved Mill and has exclusively and strictly sourced FFB from its own group of estates. The Mill does not receive FFB from third parties including smallholders. Therefore, this Indicator is not applicable.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Pamol Kluang Mill is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable
5.2.2	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 -	Pamol Kluang Mill is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Pamol Kluang Mill is an Identity Preserved Supply Chain Module. The Mill processes only FFB from its group of estates. The certification unit does not have any smallholders within its supply base. Therefore, this indicator is not applicable.	Not Applicable

5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>The mill receive only certified crop from the Group Estate with occasionally diversion from other IOI estates in event of any sister mill annual maintenance. There is at current no association to any scheme smallholders with the Pamol Palm Oil Mill.</p>	Not Applicable
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The mill receive only certified crop from the Group Estate with occasionally diversion from other IOI estates in event of any sister mill annual maintenance. There is at current no association to any scheme smallholders with the Pamol Palm Oil Mill.</p>	Not Applicable
<p>Principle 6: Respect workers’ rights and conditions</p>			
<p>Criterion 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy entitled Equal Opportunity Employment and Freedom of Association Policies is available and displayed at the main notice boards and at the workers’ housing. The Policy states that there will be no discrimination based on race, national origin, religion, gender, union membership and age. Interviews held with local and foreign workers (both male and female) at all units in Pamol Kluang Mill, Kahang and Mamor Estates confirmed that there is no form of discrimination. The workers confirmed that they were given equal employment opportunities and are able to enjoy all the benefits and use of amenities accorded by the Company.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews with workers at Pamol Kluang Mill, Kahang and Mamor Estates, documents sighted and observations made, there is no evidence that there has been any form of discrimination against any local or foreign employees.</p> <p>Review of pay checks and employment contracts also confirm that all workers irrespective of nationalities, gender, religion, etc are accorded the same employment terms and receive the same wages for the same scope of work.</p>	Complied

		<p>All foreign workers sampled confirmed that they enjoy the same benefits and amenities e.g., housing.</p> <p>There is also no evidence of recruitment fee imposed on any of the workers sampled.</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Pamol Kluang Mill, Kahang and Mamor Estates were able to demonstrate that the recruitment selection, hiring and access to training were based on skills, capabilities and medical fitness. Each worker filled up a job application form attaching copies of NRIC, qualification and previous work experience. The Manager then assessed their respective suitability to the job vacancy and recorded this in the application form. The workers also attended an orientation and induction training to familiarize them with their work in IOI.</p> <p>Reviewed during the audit were the following recruitment records:</p> <p>a. Pamol Kluang Mill (2 boilermen, 1 cleaning station operator, 1 lab assistant)</p> <p>b. Kahang Estate (1 mandore, 3 loosefruit pickers)</p> <p>c. Mamor Estate (2 harvesters, 1 mandore).</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>There was no evidence that pregnancy tests are being conducted as a discriminatory measure. Pregnancy tests were done in accordance with the Guidelines on Reproductive Health Doc No IOI/G/SE/002 Rev No. 02 dated 5 Oct 2020. Interviews with female workers confirmed that pregnancy tests are conducted only when it is legally mandated, i.e., on chemical handlers such as the lab attendant at Pamol Kluang Mill.</p> <p>Interviews conducted with the Estate Health Assistants confirmed that any pregnant workers would be re-assigned a lighter job as alternative equivalent employment. This was also confirmed by the lab attendant at Pamol Kluang Mill who said that she was reassigned</p>	Complied

		to do documentation work only and no longer came into contact with chemicals.	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The gender committees at Pamol Kluang Mill, Kahang and Mamor Estates are known as the Women Empowerment Committees (WEC). The WEC consists of all female employees, and wives of workers are also invited to join their activities.</p> <p>Review of meeting minutes and interviews held with WEC members confirmed that the WEC also provide awareness to its members on issues of concern such as sexual harassment, domestic violence, how complaints are lodged, and who to complain to.</p> <p>The WEC also discussed issues such as health and improvements for its members.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>All units within Pamol Kluang Mill and its supply base were able to demonstrate evidence of equal pay for the same work scope. A memorandum dated 16 Jan 2020 sent by the Human Resources Manager to all operating centres contained revised wages for all IOI workers in accordance with minimum wages order 2020 of RM46.15 per day per person. The SOP for Minimum Wages for estate Field/General Worker and Harvesters has been fixed irrespective of gender and nationality. This was demonstrated by comparing sampled employment contracts and payslips of loosefruit pickers at Kahang estate, and carriers at Mamor Estate who earn the same rate of pay of RM46.15 per day.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			

<p>6.2.1</p>	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Applicable labour laws and documentation of pay and conditions are available to the workers. These are in the form of employment contracts (for foreign workers) and letters of employment offer (for local workers). These documents were prepared in English and in another language that the workers understand e.g, in Hindi, Bengali or Bahasa as the case may be.</p> <p>The employment contract stipulates terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave and public holidays, mutual termination of contract, facilities, etc. The sampled employment contracts were signed, and renewed accordingly.</p> <p>Interviews conducted with workers confirmed that they understood the contents of their agreements. Sighted records of briefing given to the workers on employment contracts and working hours as follows:</p> <ul style="list-style-type: none"> - Pamol Kluang Mill: 22 July and 21 October 2021 - Kahang Estate: 29 July 2021 - Mamor Estate: 4, 5, and 6 Aug 2021 <p>The documentation of pay is in the form of monthly pay slips which are also available to the workers showing breakdown of wages received, deductions, number of days offered, number of days worked, medical and annual leave taken, work on rest day, overtime, etc.</p> <p>Interviews conducted with the workers confirmed their understanding of the terms of the employment contract and their monthly pay slips. Number of samples taken are determined based on the formula of $\sqrt{n} \times 0.8$ (n= total number of workers).</p>	<p>Complied</p>
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Employment contracts and payslips for January, May and August 2021 of the following workers were sighted during the audit:

Estate/Mill	Worker No (based on workers' lists)	Type of work	Nationality
Pamol Kluang Mill	28	Cleaning station	Malaysian
	29	Boilerman	Malaysian
	30	Boilerman	Malaysian
	36	Cleaning station	Malaysian
	39	Office clerk	Malaysian
	40	Weighbridge clerk	Malaysian
	46	Ramp attendant	Malaysian
	53	Auxiliary police	Malaysian
	1	Fireman	Indonesian
	2	Ramp attendant	Indonesian
	4	Process	Indian
	6	Process	Indian
	10	Streliser	Myanmar
18	Effluent treatment	Indian	
Mamor Estate	91	Cutter	Indonesian
	92	Driver	Indonesian
	94	Driver	Indonesian
	98	Carrier	Indonesian

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			100	Cutter	Indonesian	
			108	Cutter	Indonesian	
			109	Cutter	Indonesian	
			133	Carrier	Nepalese	
			135	Carrier	Nepalese	
			23	Carrier	Bangladesh	
			1	Harvester	Bangladesh	
		Kahang Estate	1	Gardener	Malaysian	
			3	Ramp attendant	Malaysian	
			6	Loose fruit picker	Bangladesh	
			17	Loose fruit picker	Bangladesh	
			21	Loose fruit picker	Bangladesh	
			22	Manurer	Bangladesh	
			4	Loose fruit picker	India	
			6	Loose fruit picker	India	
			9	Loose fruit picker	India	
			11	Loose fruit picker	India	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on</p>	<p>Employment contracts signed between the estate/mill management detail out terms of employment and payment. These include regular working hours, statutory deductions, duration of employment, wages payable, working hours, medical benefits including medical leave entitlement, annual leave entitlement, mutual termination of service, etc. All the contracts sampled were still current.</p>	Complied			

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	<p>compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Monthly payslips give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, pay description, (basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work. Details of sampled workers whose payslips and employment contracts were reviewed are as per those indicated under Indicator 6.2.1 above.</p>	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Employment Act 1955. They are also entitled to at least 30 minutes' rest after 5 hours of work. Similarly, workers with medical certificates are given a paid medical leave, and female employees are entitled to 3 months' maternity leave. This was verified from the mill workers' employment contracts, punch cards and interviews with the workers themselves.</p> <p>Overtime: Sighted during the audit were the overtime of boilermen for the month of August 2021 which exceeded 104 hours. Nevertheless, Pamol Kluang Mill has obtained a written permission from the Putrajaya Labour Office for overtime up to 130 hours via permit Ref. No. BHG.PU/9/134 Jld 38(2) dated 20 April 2021. This permit is valid from 20 April 2021 to 30 April 2023.</p> <p>Prohibition of night work for women: Labour office permit allowing female workers to work between 10PM to 5AM is available via permit reference No. BHG PU/9/135 Jld 18 (5) dated 15 March 2019. One of the conditions imposed in</p>	<p>Complied</p>

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		<p>the permit include written consent from the female worker, minimum period of 11 hour rest the next day, and payment of shift allowance. Sighted records of 11-hour minimum rest, shift allowance and written consent dated 11 May 2020 from the said weighbridge operator.</p> <p>Salary deductions: Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS. Non-statutory deductions are made for water and electricity bills. Such non-statutory deductions were made following the following written approvals from the Labour Office:</p> <ul style="list-style-type: none"> i. Permit Ref No. TK(NJ) U-23 dated 7 Jan 2019 for RM10 temple contributions. ii. Permit Ref No. BHG.PU/9/129/12 (22) 27 Dec 2019 for water bills. iii. Permit Ref No. BHG.PU/9/129/12(24) 27 Dec 2019 for electricity bills. <p>No record of dismissal or termination was sighted during the audit, therefore compliance with reasons for dismissal and period of notice could not be verified during this audit.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p>	<p>Pamol Kluang Mill, Kahang Estate and Mamor Estate provide adequate housing for all its workers. Each line site has sanitation facilities, water supplies either from its own source (e.g. Kahang Estate and Mamor Estate) or from Syarikat Air Johor (Pamol Kluang Mill).</p> <p>Based on linesite inspection and VMO reports, interviews with workers and Health Assistants, as well as field observations made during surveillance audit, evidence is available that the facilities are</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>provided in accordance with the Employees’ Minimum Standard of Housing, Accommodation and Amenities Act 1990 in terms of adequate water and electricity supplies, surrounding maintenance and cleanliness, free flowing drains, provision of estate clinics attended by registered health assistants, fortnightly VMO visits, and weekly housing inspections. Linesite inspection reports for Kahang Estate dated 17 Nov, 24 Nov, 3 Nov, 12 Nov, 20 Oct, 27 Oct were reviewed.</p> <p>Kahang Estate currently has no Estate Health Assistant since July 2021 after the previous HA resigned. Until the position is filled, workers requiring medical treatment are taken to a panel clinic, i.e., Klinik Palani in Kahang. The VMO also provides treatment as seen from records of VMO weekly visit dated 10 Oct 2021, 21 Oct 2021, 24 October 2021, 7 November 2021 and 21 Nov 2021. Among the amenities provided include recreational/sports facilities, surau, temple and grocery shops.</p> <p>Mamor Estate, has Labour Office permit dated 22 Dec 2019 to extract its own water subject to water quality tests, and that the person in charge is given Typhoid vaccination. Verified during the audit that the person in charge received the vaccination on 4 Feb 2019 valid until 4 Feb 2022. Water quality tests were also sighted as follows:</p> <ul style="list-style-type: none"> a. Lotus Laboratory Services (M) Sdn Bhd report Ref LS/W/K1303/21 dated 5 Oct 2021. Results: Total Coliform <2, E.coli 0. b. Lotus Laboratory Services (M) Sdn Bhd report Ref LS /W/J8872/21 dated 1 July 2021. Results: Total Coliform <2, E.coli 0. c. Lotus Laboratory Services (M) Sdn Bhd report Ref LS/W/J3226/20 31 Dec 2020 Ref total coliform <2, E.coli 0. 	
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6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Pamol Kluang Mill and its supply base were able to demonstrate that efforts have been made to improve workers' access to adequate, sufficient and affordable food by allowing food canteen sundry shops to operate near the workers' housing. Workers are also allowed an area to plant vegetables to supplement their diet.</p>	Complied

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		<p>Price lists of essential items sold such as rice, onions, vegetables, sugar, cooking oil eggs are monitored regularly and verified as follows:</p> <ul style="list-style-type: none"> - Kahang Estate: records were sighted of price lists of Kedai Makan Yanti dated 4 Nov 2021 & Kedai Runcit Tan Soon Teck dated 1 Nov 2021. - Mamor Estate: records of price list of Kedai Runcit Lora dated 1 October 2021. Additionally, during the Covid-19 lockdown where workers could not leave the estate premises, a movement control order checklist was also prepared to ensure prices of items sold in July, Aug and Sept 2021 were affordable. 	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include</p>	<p>For Pamol Kluang Mill and its supply base, the calculation of DLW took into account food, housing, non-food non-housing (medical, amenities).</p> <p>The net living wages is calculated at RM1,637.26 and the gross DLW (after adding SOCSO, income tax, Employee Insurance Scheme payments), is calculated at RM1,850.00.</p> <p>The minimum amount that the workers receive is RM1,100 per month, which is higher than the DLW calculated.</p>	Complied

	<p>other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
<p>6.2.7</p>	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>All the estates and mill employ full-time employees, and based on records reviewed and interviews conducted, there are no casual, temporary and day labour employed within Pamol Kluang Mill and its supply base.</p>	<p>Complied</p>
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

<p>6.3.1</p>	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The statement recognising freedom of association and the right to collective bargaining is available in the IOI's Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). In this document, IOI commits to uphold the rights to freedom of association and recognize the right to collective bargaining and allow trade unions to have access to all workers.</p> <p>This was explained to all workers during Policy trainings conducted as follows:</p> <ul style="list-style-type: none"> - Pamol Kluang Mill: 22 July and 21 October 2021 - Kahang Estate: 7 October 2021 - Mamor Estate: 4, 5, and 6 Aug 2021 <p>This Policy has been demonstrably implemented based on records and observations as detailed out under Indicator 6.3.2 below.</p>	<p>Complied</p>
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>The JCCs comprise workers' representatives and management representatives. They discuss issues raised by the workers in a meeting called Employees' Consultative Committees (ECC). Evidence was available to show that the workers' representatives have been freely chosen by the workers themselves via an election process. Workers' representatives have been chosen to represent their nationalities, as confirmed during audit interviews.</p> <p>Sampled during the audit were Joint Consultative Committees (JCCs) meeting minutes attended by worker representatives, and management team held as follows:</p> <ul style="list-style-type: none"> - Pamol Kluang Mill: 19 Nov 2021, 30 Sept 2021, 6 May 2021, 11 March 2021, 31 July 2021, 7 Aug 2021. Among the issues discussed included safety, requests for extra plug points to avoid overloading, water dispenser at Mill housing, repairs of faulty fixtures and fittings at the Mill workers' housing. 	<p>Complied</p>

		<ul style="list-style-type: none"> - Kahang Estate: 9 Aug 2021, 28 May 2021, 26 March 2021, 21 Oct 2021. Among issues discussed included hotline telephone number, grievance mechanism, responsibilities as workers' representatives, etc. - Mamor Estate: 21 Jan 2021, 25 March 2021, 28 May 2021. 	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Workers are free to elect their own representatives to sit in the JCC. Evidence was available to show that the workers' representatives have been freely chosen by the workers themselves via an election process and they represent their respective nationalities. This was evidenced by balloting paper for an election held in October 2020. The elected workers' representatives (Indonesians, Myanmarese, Indians, and Malaysians) were appointed for a 2-year term from October 2020 to October 2022.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Policy for the protection of children, including the prohibition against child labour is available in IOI's Sustainable Palm Oil Policy. This Policy also pledges to eliminate all forms of child labour.</p> <p>Contracts signed between Pamol Kluang Mill and the Estates contain an undertaking by the respective contractors that they shall not recruit any person below the age of 18. Clause d of the Additional Requirements For Contractors and Service Providers states that the contractors' workers must at least be 18 years old when employed. Sighted were contracts signed as follows:</p> <ul style="list-style-type: none"> - Agreement dated 1 July 2021 between Mamor Estate and Tea & T Estate Contractor for loading and transport FFB to estate ramp. - Agreement dated 1 July 2021 between Perusahaan Mekassar (M) Sdn Bhd (Kahang Estate) and Jayakumar Maju Jaya Enterprise. 	Complied

		<ul style="list-style-type: none"> - Agreement dated 1 July 2021 between Pamol Plantations Sdn Bhd (Pamol Mill) and Lee Yee Cheng for EFB & POME transport; - Agreement with with Rama Plantation and Transportation dated 1 July 2021. 	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Pamol Kluang Mill and supply base. Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job. Visit to the linesite and field also did not reveal any persons under 18 years old working.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no evidence that any young persons were employed in at Pamol Kluang Mill and its supply base as evidenced from documentation review, field observations, linesite observations and audit interviews.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The IOI Sustainability Policy which pledges to eliminate all forms of child labour is displayed at prominent places near the office and workers' housing. Based on the documents sighted, communication about its no child labour policy were communicated to all levels of employees as evidenced from training records held as follows:</p> <ul style="list-style-type: none"> - Pamol Kluang Mill: 22 July and 21 October 2021 - Kahang Estate: 7 October 2021 - Mamor Estate: 4, 5, and 6 Aug 2021 	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p>	<p>A Policy to prevent sexual and other forms of harassment is contained in IOI's Sustainable Palm Oil Policy signed by the Group</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). This document states that the Company will promote a safe and healthy working environment that is free from sexual harassment and other hazards. In addition, IOI also has a policy known as Policy on Harassment at Workplace. Based on interviews with members of the Women’s Empowerment Group and other workers, these Policies are being implemented and communicated to all levels of workforce during Policy trainings conducted as follows:</p> <ul style="list-style-type: none"> - Pamol Kluang Mill: 22 July and 21 October 2021 - Kahang Estate: 7 October 2021 - Mamor Estate: 4, 5, and 6 Aug 2021 <p>The IOI Sustainability Policy is also displayed at prominent places near the office and workers’ housing.</p>	
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment is contained in IOI’s Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability (revised in October 2020). This document states that the Company will protect reproductive health of women employees. This Policy is being implemented based on interviews held with women employees who are not prohibited from planning their families, are entitled to 3 months paid maternity leave, and women employees who are exposed to chemicals would be re-assigned to another job once she is confirmed pregnant.</p> <p>This Policy were communicated during Policy trainings conducted as follows:</p> <ul style="list-style-type: none"> - Pamol Kluang Mill: 22 July and 21 October 2021 - Kahang Estate: 7 October 2021 - Mamor Estate: 4, 5, and 6 Aug 2021 	<p>Complied</p>

6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Evidence was available that needs of new mothers were assessed. Sighted during the audit were assessment form for a new mother (lab assistant) at Pamol Kluang Mill on 8 October 2021.</p> <p>The assessments covered new mothers' needs such as needs for nursing facilities, and private place to express milk, etc.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>IOI Corporation Berhad has a Grievance Procedure dated 20/1/2020. Para 4 states that the Company commits to safeguard all stakeholders involved in the grievance process against potential threats, intimidation, violence or reprisals. Furthermore, the grievance mechanism support with Whistleblowing Policy revised on October 2019. Para 4.0 stated that the complainants may choose to remain anonymous when reporting on the particular grievance). The IOI Sustainability Policy is also displayed at prominent places near the office and workers' housing. This Policy were communicated during Policy trainings conducted as follows:</p> <ul style="list-style-type: none"> - Pamol Kluang Mill: 22 July and 21 October 2021 - Kahang Estate: 7 October 2021 - Mamor Estate: 4, 5, and 6 Aug 2021 <p>Additionally, IOI has also printed posters in various languages Interviews conducted with workers also confirmed their understanding of the grievance mechanism.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution 	<p>Based on interviews with the workers, and observations made, the following were found:</p> <ul style="list-style-type: none"> i. Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Bangladeshi and Indonesian workers at Mamor 	Complied

<ul style="list-style-type: none"> • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>estate chose to keep their passports at the estate office and had signed letters of consent. Sighted during the audit were consent letters to allow Mamor Estate to keep their passports dated 19 Dec 2017 (Worker No. 1217/66), 14 June 2017 (Worker No.0617/60) 17 July 2019 (Worker No. 0719/199).</p> <ul style="list-style-type: none"> ii. Charging of recruitment fee: Workers are not charged any recruitment fees. This is clearly stated in the contracts IOI has with its recruitment agents from India (Vazir Enterprise) dated 2 January 2020, Nepal (Relations Employment Service Pte Ltd dated 15 January 2020 and Sky of the World Manpower Pte Ltd, Kathmandu, Nepal dated 6 January 2020). Interviews conducted with workers also confirmed that they have not been charged any recruitment fees. iii. Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free decline any offers for overtime work. Sighted were written consent from workers to work overtime for Pamol Kluang Mill: Workers No. 29 (boilerman), 30 (boilerman), 41 (weighbridge clerk), fireman, and ramp attendant. iv. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with Indonesian and Myanmar workers (Kahang Estate) who informed that they wished to return home and that the estate management has consented to this and proceeded to make travel arrangements although this has been recently delayed because of Covid-19. v. Debt bondage: There is no evidence of any incidence of debt bondage. vi. Withholding of wages: There is no evidence of withholding of wages. 	
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		vii. Contract substitution: There is no evidence of contract substitution as confirmed during interviews with migrant workers from India who was recruited in Feb 2019.	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A specific labour policy and/or procedures for migrant workers are available in IOI Plantation Foreign Workers Recruitment Guideline and Procedure signed by the Plantation Director dated October 2017 (Revised July 2018). This Guidelines and Procedure covers the following:</p> <ul style="list-style-type: none"> - No payment of recruitment fee - Pre-employment stages - Arrival of workers - Orientation and induction training - Health screening - Passport handling - Provision of basic items - Grievance mechanism - Contract renewal, etc. <p>Based on audit interviews and records sighted, Pamol Kluang Mill and its supply base have demonstrated that the procedures are being implemented.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The person responsible for Safety & Health at each Certification unit assessed had been identified and the 3-monthly Safety & Health meeting held are as shown in the table below. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	Complied

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		Certification Unit	PIC	Meeting dates year 2021				
				1st	2nd	3rd	4th	
		Palmol Kluang POM	Jason Chua Seng Wei	15 Jan	16 Apr	19 Jul	15 Oct	
		Kahang Estate	Abdullah Anas B Ahmad Zawawi	26 Mar	23 June	27 Oct	Plan for Dec	
		*Mamor Estate	Muhammad Mukhlis B Mukhtar	26 Mar	24 Sep	Plan for Dec		
		<p>The Minutes of Meeting are kept maintained.</p> <p>*One session of meeting could not be held due to lack of quorum during Covid-19 Pandemic Movement Control Order.</p>						
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures available in English and Bahasa Malaysia were updated on 1.10.2020 in flow chart form as per OSH (NADOOPOD) Regulations 2004. The credible accident scenarios highly likely to occur have been identified as shown below. Each of them has specific Emergency Action Plan to facilitate and organize employer and employee actions during workplace emergencies and have been explained in Bahasa Malaysia to the workforce.</p> <ol style="list-style-type: none"> 1. Physical Injury 2. Chemical Spillage (Store/Premix Area) 3. Chemical Spillage (Filed) 4. Vehicle Accident 						Complied

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		<ol style="list-style-type: none"> 5. Fire outbreak 6. Major Spillage (CPO, Diesel or Lubricant) 7. Fire in own field or neighbouring estate 8. Chemical Poisoning - Highly Toxic Pesticides (Store/Field) 9. Monitoring and Screening for Covid-19 Prevention <p>Emergency / Fire drill is conducted annually to test the preparedness and ability of the Emergency Response Team to respond on one hand and to ensure non-ERT members follow established instructions on the other hand. The Operating Unit also tested the KKM Covid-19 procedure. Debriefing following the drill is held to identify strengths and weaknesses and improve on any shortcomings. Sighted the retained Post Mortem report at the assessed Operating Units.</p> <p>Trained Operatives in First Aid, Fire Fighting and Chemical Spills are present in both field and other operations. First aid kit and equipment is available at worksites/field and contents of the kit is checked monthly by Estate Hospital Assistant. Records of all accidents are kept and periodically reviewed at S&H Committee Meeting.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The CU remained committed to issue PPE free of charge. Acknowledgement of PPE receipt records are maintained individually for all workers to cover against all potentially hazardous operations identified/recommended in the HIRARC Register, CHRA Report and Noise Risk Assessment Report. They are given to operatives involve in pesticide application, harvesting, equipment maintenance and machine operations. Observed PPE issued include safety helmets, safety shoes, rubber boots, apron, gloves and</p>	Complied

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		<p>goggles among others. Also special PPE are also provided for workers assigned to work at height and in confined space.</p> <p>During the current Covid-19 pandemic IOI also provide free of charge facial mask and sanitizer to all employees and visitors.</p> <p>Room for Pesticides Sprayers to change out street clothings to PPE and vice versa after work including bathing and washing the soiled and contaminated PPE are available.</p>															
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care, employment injury and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4). Sighted the last three months (August, September and October 2021) payment made by each of the Certification unit assessed to SOCSO on Form A for foreign and local workers was available for review. All registered employees were checked contributed and covered by SOCSO.</p>	Complied														
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>All occupation injuries were recorded in accordance to OSH (NADOPOD) Regulations 2004.</p> <table border="1" data-bbox="1137 1061 1926 1308"> <thead> <tr> <th rowspan="2">Certification Unit</th> <th colspan="2">JKKP 8 submitted to DOSH</th> </tr> <tr> <th>Date submitted</th> <th>Reference No.</th> </tr> </thead> <tbody> <tr> <td>Pamol Kluang Mill</td> <td>21.1.2021</td> <td>JKKP8/69491/2020</td> </tr> <tr> <td>Kahang Estate</td> <td>14.1.2021</td> <td>JKKP8/71809/2020</td> </tr> <tr> <td>Mamor Estate</td> <td>12.1.2021</td> <td>JKKP8/46246/2020</td> </tr> </tbody> </table>	Certification Unit	JKKP 8 submitted to DOSH		Date submitted	Reference No.	Pamol Kluang Mill	21.1.2021	JKKP8/69491/2020	Kahang Estate	14.1.2021	JKKP8/71809/2020	Mamor Estate	12.1.2021	JKKP8/46246/2020	Complied
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		Accident records including accident notification, accident investigation, JKPP Form 6, 7 & 8 were well kept and reviewed during the OSH meeting.	
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates assessed have established IPM plans and documented them in Pest Reduction Plan, Barn Owl Implementation Program and Beneficial Plant Implementation Program.</p> <p>The plans follow IOI Group Standard Operating Procedure (StOP)</p> <ol style="list-style-type: none"> 1) For Planting of Beneficial Plants Index No. 17.1 dated December 2016 and Group Standard Operating Procedure (StOP). 2) For Integrated Management of Rat Control Index No. 10.1 dated September 2007. <p>Latest update on the IPM is a memorandum issued by the General Manager, IOI Research Center regarding the Rat Baiting Campaign dated 29/4/2020.</p> <p>Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> • Beneficial plants are continuously being planted at ratio 60:20:20 Cassia cobanensis, Antigonon leptopus, Tunera Subulata respectively. During field visit the auditor saw the beneficial plants planted along the main road and field roads as recorded in the beneficial plant planting map. At Kahang Estate 9km was planned planted but achieved 8.1km while at Mamor Estate planned met actual planted at 22.9km. • Control of rat infestation is via a 2-prong approach, that is, using Chemical (rat baiting) and Biological (Barn owl) means. Rat Baiting conducted at 2 campaign per year with interval of 6 	Complied

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months per campaign. Sighted the campaign record for a total of 41 field blocks covering an area of 1639 ha at Kahang Estate. Below is an extract of the 1st campaign:

No. of Rounds: 5/campaign
Date: 02/02/2021 – 01/07/2021
Acceptance level: 20%
Conclusion: 15% being the highest and 9% the lowest post census recorded, thus below acceptable level of 20%. Most centred around 12% and 13%.

Field Block	% Post Census	Field Block	% Post Census	Field Block	% Post Census
PM 06F	12	PM 05J	9	PM 01E	15
PM 06G	13	PM 05D	10	PM 02D	15
PM 06H	13	PM 07K	12	PM 03A	11

- Biological control of rat attack using barn owl was conducted 2 rounds per year during June and December. Shown below is census recorded for June 2021.

Estates	Kahang		Mamor
	North Div	South Div	
No of Barn Owl Box	244	313	204
Ratio box/ha	1:4.1	1:3.8	1:10
% occupancy rate,	50	58	66

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		end June 2021			
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 estates. 3 plant species were used for IPM, that is, <i>Tunera subulata</i> , <i>Cassia cobanensis</i> , and <i>Antigonan leptopus</i> .			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 is no use of fire for pest control in the estates.			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 justification for chemical usage was available as per SOP: 4.6 under appendix: 3.0 Rev. 1b dated 12.11.2020. This justification include chemical such as Glyphosate, 2-4D methyl amine, Metsulfuron methyl, Triclopyr butoxy ethyl, Glufosinate and etc. In addition to the above, IOI Group Sustainable Palm Oil Policy, under item 4 Existing Plantation, Subheading Environmental Management states that: No use of paraquat and pesticides that are categorised as World Health Organisation Class 1A or1B.			Complied

<p>7.2.2</p>	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The table below shows records of weedicide /pesticide use in year 2021.</p> <p>Kahang Estate</p> <table border="1"> <thead> <tr> <th>Active ingredients</th> <th>Area sprayed, ha</th> <th>a.i/ha (lt/ha)</th> </tr> </thead> <tbody> <tr> <td>Glyphosate Isoprpylamine 41% (LD₅₀ rat 5000 mg/kg)</td> <td>3,350</td> <td>0.1198</td> </tr> <tr> <td>Triclopyr Butoxy Ethyl Esther 32.1% (LD₅₀ rat 2000 mg/kg)</td> <td>2,448</td> <td>0.0789</td> </tr> <tr> <td>2,4 D Amine, 60% (LD₅₀ rat 949 mg/kg)</td> <td>0</td> <td>0</td> </tr> <tr> <td>Brodifacoum (LD₅₀ rat 0.26 mg/kg)</td> <td>8,189</td> <td>0.0001</td> </tr> </tbody> </table> <p>Mamor Estate</p> <table border="1"> <thead> <tr> <th>Active ingredients</th> <th>Area sprayed, ha</th> <th>a.i/ha (lit/ha)</th> </tr> </thead> <tbody> <tr> <td>Glyphosate Isoprpylamine 41% (LD₅₀ rat 5000 mg/kg)</td> <td>3.768</td> <td>0.1858</td> </tr> <tr> <td>Triclopyr Butoxy Ethyl Esther 32.1% (LD₅₀ rat 2000 mg/kg)</td> <td>3,728</td> <td>0.0843</td> </tr> <tr> <td>2,4 D Amine, 60% (LD₅₀ rat 949 mg/kg)</td> <td>0</td> <td>0</td> </tr> <tr> <td>Brodifacoum (LD₅₀ rat 0.26 mg/kg)</td> <td>8</td> <td>0.00005</td> </tr> <tr> <td>Metsulfuron methyl 20% (LD₅₀ rat 2000 mg/kg)</td> <td>4,040</td> <td>0.0043</td> </tr> </tbody> </table>	Active ingredients	Area sprayed, ha	a.i/ha (lt/ha)	Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg)	3,350	0.1198	Triclopyr Butoxy Ethyl Esther 32.1% (LD ₅₀ rat 2000 mg/kg)	2,448	0.0789	2,4 D Amine, 60% (LD ₅₀ rat 949 mg/kg)	0	0	Brodifacoum (LD ₅₀ rat 0.26 mg/kg)	8,189	0.0001	Active ingredients	Area sprayed, ha	a.i/ha (lit/ha)	Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg)	3.768	0.1858	Triclopyr Butoxy Ethyl Esther 32.1% (LD ₅₀ rat 2000 mg/kg)	3,728	0.0843	2,4 D Amine, 60% (LD ₅₀ rat 949 mg/kg)	0	0	Brodifacoum (LD ₅₀ rat 0.26 mg/kg)	8	0.00005	Metsulfuron methyl 20% (LD ₅₀ rat 2000 mg/kg)	4,040	0.0043	<p>Complied</p>
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>It has been IOI policy to minimize the use of pesticides. The pesticides use needs is gradually reduced via Chemical Reduction Plan to a level that is effectively required to ensure crop production, and where possible eliminated, in accordance with IPM plans. In other words, pesticides use is based on the 'need-to-do basis' to enhance field operations.</p> <p>Monitoring the extent of IPM implementation for major pests had been established, for instance, rats infestation and bagworms. The type of pest, its disease symptoms, census population, life cycle, threshold level for chemical treatment, control methods, etc. are enumerated in IOI Group Standard Operating Procedures.</p> <p>Evidence of IPM implementation the auditor noted the incremental planting and maintenance of beneficial plant at major roads and field roads over the years. Growing beneficial plants, <i>Antigonon</i>, <i>Cassia cobanensis</i> and <i>Turnera subulata</i> were along the roadside for hosting of predator insects to improve its population against the pests of leaf eating nettle caterpillars and bagworms.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The IPM implementations described in Indicator 7.1.1 are meant to minimise the use of pesticides.</p> <p>There has been no prophylactic use of pesticides at the visited estates.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p>	<p>IOI only purchase chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Sighting of the Chemical Register at the assessed estates showed that only class II, III & IV chemicals were used. There were no</p>	Complied

	<p>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. - Minor compliance -</p>	<p>Class 1A and Class1B agrochemicals used. Paraquat was eliminated. In its place, alternatives such as Glyphosate were used instead.</p>	
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. - Critical (Major) compliance -</p>	<p>Pesticides operators including sprayers, rat bait assignees and storekeeper have been provided with proper PPE, PPE training, safe handling of chemicals training specifically with respect to SaOP for spraying, rat baiting, storekeeping and pre-mixing. All precautions attached to each Chemical Safety Data Sheet were explained to them. Observed during the field visit the use of PPE by the operators such as google, half face organic vapor respirator, nitrile hand glove, long sleeve shirt, long pants outside of Wellington rubber boot worn and apron were obediently followed. Job Knowledge in respect of activity for each pesticides handler are periodically refreshed and updated (cross reference indicator 3.7.1 above, 2nd table, items 15,16 and 21).</p>	<p>Complied</p>
<p>7.2.7</p>	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH (USECHH) Regulations (2000). At Kahang and Mamor Estates the storage of pesticides were in accordance with the Occupational Safety and Health Act 1994 (Act</p>	<p>Complied</p>

		<p>514) and its Regulations and Orders and Pesticides Act 1974 (Act 149) and its Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OSH CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official.</p> <p>At these estates, their chemical stores were inspected and it was noted that they all comply with the relevant act as well as best practice.</p> <ul style="list-style-type: none"> • All stores were secured under lock and key with restricted access. • Provision of ventilation fan. • Display of Safety Pictorial poster, namely the required PPE and chemical Safety hazards pictogram. • Pesticides were separated by class. • Daily balance of remaining solution after completing pre-mixing were kept in the store under lock and key. • Concrete cemented floor, bund wall and provision of sump pond. • Store keeper was trained in the handling of all pesticides. • SDS leaflets were available at all pesticide stores. 	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticides containers of various sizes (100 gm to 20 liter) had been triple rinsed, 3 holes punched at its bottom to render it useless and stored separately as Scheduled Waste, SW409 for disposal in accordance with legal requirements. They were collected by authorized vendor, that is, Kualiti Alam Sdn Bhd, a registered</p>	Complied

		contractor with DOE. Please refer to indicator 7.3.2 for details of disposal.																
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No aerial spraying was carried out at both Kahang and Mamor estates.	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 -	Annual medical surveillance conducted as follows: <table border="1" data-bbox="1137 742 1928 1077"> <thead> <tr> <th>Estate</th> <th>Date tested</th> <th>No. of Pesticides Operators</th> <th>Test results</th> <th>DOSH-OHD Registration no.</th> </tr> </thead> <tbody> <tr> <td>Kahang Estate</td> <td>9.9.2021</td> <td>10</td> <td>All Fit To Work</td> <td>JKKP HQ /19/DOC/00/597</td> </tr> <tr> <td>Mamor Estate</td> <td>15.7.2021</td> <td>24</td> <td>All Fit To Work</td> <td>JKKP HQ /19/DOC/00/382</td> </tr> </tbody> </table>	Estate	Date tested	No. of Pesticides Operators	Test results	DOSH-OHD Registration no.	Kahang Estate	9.9.2021	10	All Fit To Work	JKKP HQ /19/DOC/00/597	Mamor Estate	15.7.2021	24	All Fit To Work	JKKP HQ /19/DOC/00/382	Complied
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7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	No female Pesticides sprayers nor under age of 18 as sighted in Employees Register were employed at Kahang Estate and Mamor Estate.	Complied															
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.																		
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Wastes management plan and reduction plan dated November 2021 established for Pamol POM.	Complied															

	<p>- Minor compliance -</p>	<p>Among the wastes identified are:</p> <ul style="list-style-type: none"> • Scheduled wastes & empty chemical containers • Clinical wastes • Domestic & recyclable wastes, sewage and garden residue • POME • Scrap iron • Fibre & shell <p>Scheduled wastes were disposed through licensed vendors and records of disposal were maintained in accordance to EQA Regulations whereas the empty chemical containers, apart from being used for containing pre-mixed herbicides, were triple-rinsed and sent to recycler vendor.</p> <p><u>Pamol POM</u></p> <p>Waste identification and notification was done using 2nd schedule to DEO via eSWISS.</p> <p>Latest notification to DOE dated 12/10/2020 for SW 103 (used batteries), ref: 2020101212WLMQ7R</p> <p>Based on 5th schedule (inventory record), total of 17 type of scheduled waste generated at Pamol POM. Refer to 5th schedule dated 16/11/21.</p> <p><u>Mamor Estate</u></p> <p>Waste identification and notification was done using 2nd schedule to DEO via eSWISS.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Records of waste disposal were verified as per below:</p> <p><u>Pamol POM</u></p>	Complied

		<p>6th Schedule (consignment notes), latest disposal made on 17/6/21 by Kualiti Alam Sdn Bhd SW109 – 0.0482 mt (ref: 2021061710CLXEZ6) SW305 – 0.6683 mt (ref: 20210617101NRKTA) SW110 – 0.019 mt (ref: 20210617103HDFE4) SW429 – 0.023 mt (ref: 2021061710DS4TB3) SW306 – 0.4497 mt (ref: 2021061710FAP5EC) SW103 – 0.0003 mt (ref: 2021061710HDW73F) SW104 – 0.0236 mt (ref: 2021061710MCT1PZ) SW312 – 0.01 mt (ref: 20210617100QRCY8) SW410 – 0.0934 mt (ref: 2021061710PC9I6W) SW409 – 0.2288 mt (ref: 2021061710U10AJV)</p> <p><u>Mamor Estate</u> Disposal records 6th Schedule (consignment notes), latest disposal made on 23/9/21 by Kualiti Alam Sdn Bhd SW305 – 0.029 mt (ref: 2021092311049I2G) SW409 – 0.0167 mt (ref: 2021092311560349) SW104 – 0.0056 mt (ref: 2021092311L7TQCB) SW404 – 0.0173 mt (ref: 2021092312Y0LIE1) SW410 – 0.0934 mt (ref: 2021061710PC9I6W) SW409 – 0.2288 mt (ref: 2021061710U10AJV)</p> <p>Domestic waste disposal handled by contractor, MIDO recycle. Waste collection records in November 2021 with total of 2.46 mt</p>	
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		was sighted, WB chit no 47, 56 and 57. For recyclable material, recycler named 5 star recycle used for sale of recycle item.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	All palms in estates were planted between the years 1997 to 2020. During the field visit there was no land preparation/replanting made using fire for the land preparation and clearing. This is also specified in item 3 of IOI Plantation Zero Burning Policy by Plantation Director dated May 2018. The estates adhered to the SOP in the policy advocates zero burning. All previous crop is felled, chipped/shredded, shredded, windrowed and left to decompose. Interview with the workers and head workers also confirmed that fire is not being used for the above purpose.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>Good agriculture practices to manage soil fertility to ensure optimal and sustained yield and to minimize environmental impacts are followed in accordance to the Group Standard Operating Procedures (StOPs), particularly to the following documents:</p> <ul style="list-style-type: none"> • Section 4.0 Soil Conservation and Terracing • Section 5.0 Establishment and Maintenance of Legume Covers • Section 8.0: Manuring and • Section 15.0 Foliar sampling. <p>Inorganic fertilizer as well as organic fertilizer in the form of POME and EFB is applied as per recommendation from IOI Research Centre. Recycling of biomass waste into useful nutrients, such as EFB application at 40t/ha, frond stacking, water management in low lying areas, maintenance of soft weeds, and keep <i>Nephrolepis biserrata</i> in the interline and terrace areas were evident during field visits at the assessed estates.</p>	Complied

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<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -</p>	<p>Tissue/foiar sampling and soil sampling was carried out on annual basis by Agronomist from IOI Research Center. The result was documented in Oil Palm Fertiliser Recommendation meant for fertilizer application in the following year. The foliar and soil sampling were conducted as follows:</p> <table border="1" data-bbox="1137 580 1935 794"> <thead> <tr> <th>Estate</th> <th>Sampling Period</th> <th>Year of Planting sampled</th> <th>No. of Field Blocks sampled</th> </tr> </thead> <tbody> <tr> <td>Kahang</td> <td>June 2021</td> <td>2001 -2009</td> <td>59</td> </tr> <tr> <td>Mamor</td> <td>January 2021</td> <td>2000 - 2009</td> <td>37</td> </tr> </tbody> </table>	Estate	Sampling Period	Year of Planting sampled	No. of Field Blocks sampled	Kahang	June 2021	2001 -2009	59	Mamor	January 2021	2000 - 2009	37	<p>Complied</p>							
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Mamor	January 2021	2000 - 2009	37																			
<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -</p>	<p>Biomass waste recycling application was done as per program established with recommendation by agronomist. Sighted the application records as per EFB and POME Application program (Jan 2021 – September 2021) as follows.</p> <p>There was no POME program for Mamor Estate during year under review. At Mamor Estate, the EFB program was generally not achieved due to no EFB transported from Mill.</p> <table border="1" data-bbox="1137 1107 1917 1362"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">Kahang Estate</th> <th>Mamor Estate</th> </tr> <tr> <th>Solid (MT)</th> <th>POME EFB (MT)</th> <th>EFB (MT)</th> </tr> </thead> <tbody> <tr> <td>Jan 2021</td> <td>5.45</td> <td>1286.56</td> <td>Not achieved</td> </tr> <tr> <td>Feb 2021</td> <td>835.38</td> <td>1026.85</td> <td>Not achieved</td> </tr> <tr> <td>Mar 2021</td> <td>655.31</td> <td>1570.83</td> <td>Not achieved</td> </tr> </tbody> </table>	Month	Kahang Estate		Mamor Estate	Solid (MT)	POME EFB (MT)	EFB (MT)	Jan 2021	5.45	1286.56	Not achieved	Feb 2021	835.38	1026.85	Not achieved	Mar 2021	655.31	1570.83	Not achieved	<p>Complied</p>
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program is based on the recommendation by Agronomist from IOI Research Centre and documented in Fertilizer Recommendation Report. Observed the recommendation and implementation record completed for FY 2021:</p> <p><u>Kahang Estate</u></p> <p>Fertilizer application program for Kahang Estate were made available to the audit team. It was noted there was delay in application due to all manuring workers were diverted to assist in harvesting operation arising from shortage of manpower during the Covid-19 pandemic attack.</p> <p>The below table showed the program.</p> <table border="1"> <thead> <tr> <th>Program Month</th> <th>Jan 2021</th> <th>March 2021</th> <th>April 2021</th> <th>July 2021</th> </tr> </thead> <tbody> <tr> <td>Date applied</td> <td>15.3.2021</td> <td>13.7.2021</td> <td>20.7.2021</td> <td>5.12.2021</td> </tr> <tr> <td>Field</td> <td>All Fields</td> <td>All Fields</td> <td>All Fields</td> <td>All Fields</td> </tr> <tr> <td>Ha Program</td> <td>2278</td> <td>2278</td> <td>2278</td> <td>2278</td> </tr> <tr> <td>Fertilizer</td> <td>NK Mixture</td> <td>Borate</td> <td>GML</td> <td>NK Mixture</td> </tr> <tr> <td>Rate/palm</td> <td>2.25 kg</td> <td>0.1 gm</td> <td>2.0 kg</td> <td>2.25 kg</td> </tr> </tbody> </table>	Program Month	Jan 2021	March 2021	April 2021	July 2021	Date applied	15.3.2021	13.7.2021	20.7.2021	5.12.2021	Field	All Fields	All Fields	All Fields	All Fields	Ha Program	2278	2278	2278	2278	Fertilizer	NK Mixture	Borate	GML	NK Mixture	Rate/palm	2.25 kg	0.1 gm	2.0 kg	2.25 kg	Complied
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		<p>Mamor Estate</p> <p>Unlike Kahang Estate, there was no delay in fertilizer application at Mamor Estate. Sampled the following program for selected field.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>March</th> <th>May</th> <th>October</th> <th>November</th> </tr> </thead> <tbody> <tr> <td>Date applied</td> <td>30.3.2021</td> <td>31.5.2021</td> <td>13.10.2021</td> <td>24.11.2021</td> </tr> <tr> <td>Field</td> <td>08B</td> <td>09D</td> <td>02A</td> <td>03B</td> </tr> <tr> <td>Ha Program</td> <td>39</td> <td>25</td> <td>46</td> <td>37</td> </tr> <tr> <td>Fertiliser</td> <td>Borate</td> <td>GML</td> <td>RP</td> <td>NK</td> </tr> <tr> <td>Rate/palm</td> <td>100gm</td> <td>2.0 kg</td> <td>2.0 kg</td> <td>2.25 kg</td> </tr> </tbody> </table>	Month	March	May	October	November	Date applied	30.3.2021	31.5.2021	13.10.2021	24.11.2021	Field	08B	09D	02A	03B	Ha Program	39	25	46	37	Fertiliser	Borate	GML	RP	NK	Rate/palm	100gm	2.0 kg	2.0 kg	2.25 kg	
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<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>																																	
<p>7.5.1</p>	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Soil series map were available for all estates visited prepared by the IOI Research Centre. There is no marginal or fragile present at Kahang and Mamor estates. Soil series and percentage identified as follows:</p> <table border="1"> <tbody> <tr> <td>Kahang Estate</td> <td>Harimau 80.67%; Local Alluvium 6.74 %; Muck 0.32%; Organic clay 11.64%; Sungai Buluh 0.63%</td> </tr> <tr> <td>Mamor Estate</td> <td>Beserah 5.66%; Bukit Batu 1.84%; Bungor 6.57%; Camp 1.00%; Chat 0.76%; Gajah Mati 8.90%; Gong Chenak 10.24%; Local Alluvium 4.20%; Malacca 12.34%; Munchong 1.86%; Renggam 45.52%; Tavy 1.11%</td> </tr> </tbody> </table>	Kahang Estate	Harimau 80.67%; Local Alluvium 6.74 %; Muck 0.32%; Organic clay 11.64%; Sungai Buluh 0.63%	Mamor Estate	Beserah 5.66%; Bukit Batu 1.84%; Bungor 6.57%; Camp 1.00%; Chat 0.76%; Gajah Mati 8.90%; Gong Chenak 10.24%; Local Alluvium 4.20%; Malacca 12.34%; Munchong 1.86%; Renggam 45.52%; Tavy 1.11%	<p>Complied</p>																										
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Noted the requirement of this indicator 7.5.2 has been complied by Palmol Kluang region. This requirement is also addressed in StOP for land Preparation for New Planting and Re- Planting, refer document no. IOI/SOP/A/05 issue date 2007 revision March 2020 under section 6.5: Construction of new Roads: Hilly to steep terrain ($\leq 25^\circ$ slope) stated as follows:</p> <p>"No planting/terracing shall be carried out at very steep terrains ($\geq 25^\circ$ slope)".</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No planting on steep terrain are practised at both estates as confirmed during field visits.</p>	Complied
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series map were available for all estates visited prepared by the IOI Research centre. No marginal and fragile soils identified in all estates in Pamol Kluang Region. During field visit at Kahang and Mamor estate sighted there was no palm oil planting on steep terrain. On the other hand land terrain, drainage and road systems during planning were evident.</p>	Not Applicable
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Planting on marginal and fragile soils is avoided in conformance with IOI Procedure StOP for land Preparation for Management of Oil Palm on Peatland Replanting, document no. IOI/SOP/A/03 issue date 2007 revision March 2020.</p>	Not Applicable

7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>IOI Research Centre conducted assessment and provided the estates with soil survey information (soil series map sighted available) and topography maps. Sampled topography information at estates visited as follows:</p> <table border="1" data-bbox="1137 507 1904 874"> <thead> <tr> <th>Slope</th> <th>Kahang Estate</th> <th>Mamor Estate</th> </tr> </thead> <tbody> <tr> <td>0^o-2^o</td> <td>23.4%</td> <td>15.64%</td> </tr> <tr> <td>2^o-6^o</td> <td>68.37%</td> <td>61.54%</td> </tr> <tr> <td>6^o-12^o</td> <td>8.23%</td> <td>20.31%</td> </tr> <tr> <td>12^o-15^o</td> <td>Nil</td> <td>0.73%</td> </tr> <tr> <td>15^o-25^o</td> <td>Nil</td> <td>1.48%</td> </tr> <tr> <td>>25^o</td> <td>Nil</td> <td>0.3%</td> </tr> </tbody> </table>	Slope	Kahang Estate	Mamor Estate	0 ^o -2 ^o	23.4%	15.64%	2 ^o -6 ^o	68.37%	61.54%	6 ^o -12 ^o	8.23%	20.31%	12 ^o -15 ^o	Nil	0.73%	15 ^o -25 ^o	Nil	1.48%	>25 ^o	Nil	0.3%	Not Applicable
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<p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>																								
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.</p>	Complied																					
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>Not applicable as the areas are non-peat.</p> <p>No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established.</p>	Not Applicable																					

7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.</p>	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.</p>	Not Applicable
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.</p>	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.</p>	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the</p>	<p>No peat soil identified at all estates visited in Pamol Kluang Region as per Soil Map established. Verified there is no new planting activity in the estate visited.</p>	Not Applicable

	<p>'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>		
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plan for palm oil processing 2021 dated 16/11/2021 was made available for verification. Under section 3, impact and mitigation has been identified for 2 sources of waste water from oil mill.</p> <p>Surface run off water – captured in oil trap and disposed as scheduled waste.</p> <p>Effluent of FFB processed, coming from the leachate of EFB, and cleaning water – channel to pit and pump to ETP</p> <p>Monitoring of checklist (oil trap)</p> <p>No.1 latest 18/11/21 – cleanliness, cigarette butt, cleaning frequency, sump and pipes, oil in second and third trap etc.</p> <p>No.5 latest 18/11/21 – cleanliness, cigarette butt, cleaning frequency, sump and pipes, oil in second and third trap etc.</p> <p><u>Mamor Estate</u></p> <p>Water management plan for oil palm cultivation 2021 dated 18/11/21 was made available for verification. Buffer and riparian buffer maintenance and classification of HCV 4</p>	<p>Complied</p>
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. IOI group has established riparian buffer zone distance as per Department of Irrigation and Drainage department and documented in HCV Assessment Report as follows:</p>	<p>Complied</p>

<p>provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	River width		Buffer zone			
	> 40 meters		50 meters			
	20 – 40 meters		40 meters			
	10 – 20 meters		20 meters			
	5 – 10 meters		10 meters			
	< 5 meters		5 meters			
	<p><u>Kahang Estate</u></p> <p>Monitoring of water quality index (WQI)</p> <p>Ref: KHE/18/01/2021 dated 20/1/2021, standard reference is based on NWQS class III</p>					
	Parameter	Ref. point (20W/2 65 AKH-1)	Ref. point (20W/2 66 AKH-3)	Ref. point (20W/2 68 BKH-1a)	Ref. point (20W/2 70 BKH-3)	Ref. range (Class III)
	BOD	2	2	4	2	6
	COD	23	23	38	30	50
AN	0.8	0.8	1.1	0.8	0.9	
SS	2	4	4	2	150	
TS	108	168	136	122	4000	
pH	5.1	4.4	4.4	4.5	5	
Reference point stream A (upstream: AKH-1, downstream: AKH-3)						

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		<p>Stream B (upstream: BKH-1a, downstream: BKH-3) Upset parameter reported at upstream however on the downstream the parameter meeting the required range. <u>Mamor Estate</u> Monitoring of water quality index (WQI) dated 12/4/2021, standard reference is based on NWQS class III</p> <table border="1" data-bbox="1137 587 1917 1098"> <thead> <tr> <th>Parameter</th> <th>Ref. point (21W/1 52 AMM-2)</th> <th>Ref. point (20W/1 53 AMM-3a)</th> <th>Ref. point (21W/1 55 BMM-2)</th> <th>Ref. point (21W/1 56 BMM-3)</th> <th>Ref. range (Class III)</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>2</td> <td>2</td> <td>2</td> <td>3</td> <td>6</td> </tr> <tr> <td>COD</td> <td>19</td> <td>23</td> <td>19</td> <td>31</td> <td>50</td> </tr> <tr> <td>AN</td> <td>0.7</td> <td>1.1</td> <td>1.1</td> <td>1.1</td> <td>0.9</td> </tr> <tr> <td>SS</td> <td>6</td> <td>4</td> <td>2</td> <td>2</td> <td>150</td> </tr> <tr> <td>TS</td> <td>182</td> <td>200</td> <td>174</td> <td>186</td> <td>4000</td> </tr> <tr> <td>pH</td> <td>4.6</td> <td>4.8</td> <td>4.6</td> <td>4.2</td> <td>5</td> </tr> </tbody> </table> <p>Reference point stream A (upstream: AMM-2, downstream: AMM-3a). Stream B (upstream: BKH-1a, downstream: BKH-3)</p>	Parameter	Ref. point (21W/1 52 AMM-2)	Ref. point (20W/1 53 AMM-3a)	Ref. point (21W/1 55 BMM-2)	Ref. point (21W/1 56 BMM-3)	Ref. range (Class III)	BOD	2	2	2	3	6	COD	19	23	19	31	50	AN	0.7	1.1	1.1	1.1	0.9	SS	6	4	2	2	150	TS	182	200	174	186	4000	pH	4.6	4.8	4.6	4.2	5	
Parameter	Ref. point (21W/1 52 AMM-2)	Ref. point (20W/1 53 AMM-3a)	Ref. point (21W/1 55 BMM-2)	Ref. point (21W/1 56 BMM-3)	Ref. range (Class III)																																								
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>Pamol POM using open aerated pond (anaerobic and aerobic pond system) with biological treatment integrated with methane capture facility. The ponds were in series for its treatment of effluent. Method of discharge is land application using furrow system with the BOD3 limit of 100 mg/l. The quality of discharged effluent analysed every month summarized as per below:</p>	Complied																																										

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Quarter	Submission date	Remark
1st quarter (January to March 2021)	Submission date 19/4/21	BOD3 : 31, 52 and 82 Limit: 100 mg/l
2nd quarter (April to June 2021)	Submission date 3/7/21	BOD3 : 72, 27 and 67 Limit: 100 mg/l
3rd quarter (July to September 2021)	Submission date 24/11/21	BOD3 : 49,37 and 70 Limit: 100 mg/l
<p>Analysis for river water from upstream, downstream of Sg Sembrong and point of discharge monitored on monthly basis. Sample of analysis report verified as the following:</p>		
Month	Certificate of analysis (CoA) ref. /results	Remarks
August 2021	Ref: WWSA(J)/21-08/07 by accredited lab. Eurofins NM Laboratory Sdn Bhd. BOD5 (limit 6) Upstream: 5 Downstream: (not detected, ND) Midstream: 7 (NC) TSS (total suspended solid) max 150	Sampling date: 12-19/8/2021

		Upstream: (not detected, ND) Downstream: 242 Midstream: (not detected, ND) Ref. std. : Class III (NWQS)													
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill water use per tonne of FFB monitored and recorded as per below:		Complied											
		<table border="1"> <thead> <tr> <th></th> <th>FFB processed</th> <th>Water usage</th> <th>Ratio</th> </tr> </thead> <tbody> <tr> <td>FY2020</td> <td>163,404.7 mt</td> <td>193,670 m3 @ tonne</td> <td>1.18 tonne /FFB</td> </tr> <tr> <td>FY2021</td> <td>193,381.39 mt</td> <td>187,457 m3 @ tonne</td> <td>0.97 tonne /FFB</td> </tr> </tbody> </table>		FFB processed	Water usage	Ratio	FY2020	163,404.7 mt	193,670 m3 @ tonne	1.18 tonne /FFB	FY2021	193,381.39 mt	187,457 m3 @ tonne	0.97 tonne /FFB	
	FFB processed	Water usage	Ratio												
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FY2021	193,381.39 mt	187,457 m3 @ tonne	0.97 tonne /FFB												
		*Ideal water to FFB ratio is 1:1													
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised															
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	Plan for efficiency use of fossil fuels and to optimise renewable energy documented under environmental impact assessment management action plans and continuous improvement plans, Pamol Palm Oil Mill, date review November 2021 prepared by IOI Sustainability, Safety and Health Department.		Complied											
		<table border="1"> <thead> <tr> <th>Fuel category</th> <th>FY 2020</th> <th>FY 2021 (to date)</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Fossil</td> <td>1.47 liter/mt (diesel/CPO)</td> <td>1.41 liter/mt (diesel/CPO)</td> <td>Descending trend</td> </tr> <tr> <td>Renewable energy (RE)</td> <td>0.74 RE/CPO</td> <td>0.758 RE/CPO</td> <td>Acceding trend</td> </tr> </tbody> </table>	Fuel category	FY 2020	FY 2021 (to date)	Remarks	Fossil	1.47 liter/mt (diesel/CPO)	1.41 liter/mt (diesel/CPO)	Descending trend	Renewable energy (RE)	0.74 RE/CPO	0.758 RE/CPO	Acceding trend	
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Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p>	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>No development within Pamol Kluang Region Certification Unit since 2014.</p>	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Plan to reduce and minimize significant pollutants documented under environmental impact assessment Pamol Palm Oil Mill, date review 15 November 2021.</p> <p>Plan to reduce or minimise significant pollutants was not effectively implemented and monitored. Based on observation during site visit at Pamol POM parameter discharge points;</p>	Non-compliance

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		<p>Oil trap no.1 - Hot water flowing to oil trap no.1 and discharge to the nearby estate drain/stream.</p> <p>Oil trap no.5 - Unpleasant odor of orangey/yellowish murky water with oil scum observed in all 3 compartments of oil trap</p> <p>No evidence to show that discharge limit has been met from both oil traps and comply with EQA 1974, section 25(1) restriction on pollution on inland water. Thus, a major NC was raised.</p> <p>Monitoring of stack emission carried twice per month @ every 6 months in license period. Stack emission monitoring report for boiler no.1 by 3rd party consultant, Eurofins NM Laboratory Sdn Bhd. Refer to report AEMR(J)/21-01/03 dated 6/1/21.</p> <p><u>January – June 2021 (1st half 2021)</u></p> <p>Dust load: 190 mg/m³, corrected at 12% CO₂</p> <p>NOx: 80 mg/m³ vs 400 mg/m³</p> <p>SOx: 2.4 mg/m³ vs 400 mg/m³</p> <p>Opacity: Ringelmann 1</p> <p>Emission limit is based on Contravene of License (CL), dust emission: max 390 mg/m³, opacity: 20%</p> <p>*Refer to CL dated 31/5/21, license no. 005349. (validity period: 6/6/21 – 31/12/21)</p> <p>Monitoring of stack emission carried twice per month @ every 6 months in license period. Stack emission monitoring report for boiler no.2 by 3rd party consultant, Eurofins NM Laboratory Sdn Bhd. Refer to report AEMR(J)/21-05/03 dated 25/5/21.</p> <p><u>January – June 2021 (1st half 2021)</u></p> <p>Dust load: 145 mg/m³, corrected at 12% CO₂</p>	
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		<p>NOx: 240 mg/m³ vs 400 mg/m³ SOx: 10.4 mg/m³ vs 400 mg/m³ Opacity: Ringelmann 1 Emission limit is based on Contravene of License (CL), dust emission: max 170 mg/m³, opacity: 20% *Refer to CL dated 31/5/21, license no. 005349. (validity period: 6/6/21 – 31/12/21)</p> <p>Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH₄) emission through POME treatment. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions. Among the plans to minimize the pollutants were ensuring efficiency of the effluent treatment plant and maximizing the application of EFB therefore dependency to inorganic fertilizers can be reduced.</p>	
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			
<p>7.11.1</p>	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>IOI group has established Zero Burning Policy as per 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, EQA 1974 specifically on section 29A (prohibition on Open Burning) and 29AA (Exclusion from 'Open Burning') signed by the Plantation Director on May 2018. The policy was communicated to all the employee through training, briefing and signage at several notice board in the estate.</p> <p>IOI group has established Group Standard Operating Procedure (StOP) for Land Clearing, index 4.1 and Group Standard Operating Procedure (StOP) for Land Preparation for New Planting and Replanting, index 4.2 prepared on September 2007. All felled palm will be shredded or chip and piled between planting rows.</p>	<p>Complied</p>

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 -	Mamor Estate and Kahang Estate had established and identified in its Emergency Response Plan Procedure credible scenario that has potential to occur include Fire outbreak and Fire in own field or neighbouring estate as mentioned in indicator 6.7.2 above. Water bowser and portable firewater pump is available.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Based on the last group stakeholder meeting minute dated 28/10/21 for Pamol Complex, fire prevention and control measures presented to the stakeholders. Adjacent stakeholders (Ladang Kekayaan, Ladang Tereh, Smallholder near to PM98E @ Bukit Batu - Mamor Estate) and (Zamrud Estate, Sembrong Estate, Ladang Hutan Getah - Kahang Estate) were invited but none of them attended the meeting. No further engagement process being done for the adjacent stakeholders to communicate on fire prevention and control measures. Thus, a minor NC was raised.	Non-compliance
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 within Pamol POM certification unit. Thus, this indicator is not applicable.	Not Applicable
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: 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.	Pamol POM certification unit falls under para (a); The internal HCV assessment done by internal assessor (HCVRN trained assessor) on September 2014. Details of HCV identification and recommendation detailed out under indicator 7.12.4.	Complied

	<p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>											
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable	Not Applicable									
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>No land clearing after November 2005 and no new planting and land clearing since 15 November 2018. Internal HCV re-assessment was done in 2014 covering all the operating units under Pamol POM certification unit. The report includes the Management Action Plans is annually reviewed and last review was on 11/11/2021. Among the HCV Identified as follows:</p> <table border="1" data-bbox="1137 932 1879 1318"> <thead> <tr> <th>Estate</th> <th>Internal HCV</th> <th>External HCV</th> </tr> </thead> <tbody> <tr> <td>Kahang Estate</td> <td>HCV 4 (4.11 ha) including conservation area</td> <td>N/A</td> </tr> <tr> <td>Mamor Estate</td> <td>HCV 4 (46.04 ha) including conservation area</td> <td>HCV5 – stream flow to Ladang Tereh (HCV5) for domestic water source</td> </tr> </tbody> </table> <p>With regards to the HCV & Conservation Area Management Action Plans & Continuous Improvement Plan, each of the operating unit</p>	Estate	Internal HCV	External HCV	Kahang Estate	HCV 4 (4.11 ha) including conservation area	N/A	Mamor Estate	HCV 4 (46.04 ha) including conservation area	HCV5 – stream flow to Ladang Tereh (HCV5) for domestic water source	Complied
Estate	Internal HCV	External HCV										
Kahang Estate	HCV 4 (4.11 ha) including conservation area	N/A										
Mamor Estate	HCV 4 (46.04 ha) including conservation area	HCV5 – stream flow to Ladang Tereh (HCV5) for domestic water source										

		<p>conduct their own review. Generally, among the action plans established were:</p> <ul style="list-style-type: none"> • To enhance security to prevent illegal hunting • To establish/maintain riparian zone according to DID guideline • To rehabilitate the degraded riparian zone • To provide awareness and education among employees regarding HCV and conservation areas through trainings and signage's <p>The certification unit has conducted HCV assessment in 2015 and as per report High Conversation Value and Conservation Area dated 20/11/2018. The report includes management Action Plans and Continuous Improvement plan.</p>	
7.12.5	<p>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.</p> <p>- Minor compliance -</p>	<p>Based on internal HCV assessment dated September 2014, no local communities identified within HCV area under Pamol POM certification unit. Thus, this indicator is not applicable.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>No RTE species identified in the external HCV 4 for Kahang and Mamor Estate. Based on RTE assessment dated November 2021, only protected, totally protected and protected wildlife for aborigine consumption were sighted in the estate. Species such as monitor lizard, wild boar, king cobra and red jungle fowl to name a few.</p> <p>Regular programme to educate workforce about the status of RTE species is in place. Latest RTE training dated 18/8/21 (Kahang Estate), HCV training 16/8/21, buffer zone training (15/4/21) and Mamor Estate (30/10/21) were given to the workforce emphasising on disciplinary measures if any individual working for the company</p>	Complied

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		is found to capture, harm, collect, trade, possess or kill these RTE species.																			
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>No new planting and land clearing since 15 November 2018. Monitoring of conservation area (conservation, riparian, forest buffer) was done on weekly basis. <i>Senarai Semak dan Rekod Pemantauan di Kawasan Konservasi/forest buffer/buffer zone</i> for 2021 was made available for verification. Summary of monitoring activities:</p> <table border="1" data-bbox="1137 646 1926 890"> <thead> <tr> <th>Estate</th> <th>Monitoring date</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Kahang</td> <td>23/10/21, 23/9/21</td> <td>No non-compliance issues reported</td> </tr> <tr> <td>Mamor</td> <td>28/7/21, 30/8/21, 16/9/21, 30/10/21</td> <td>Steep hill (HCV4), no non-compliance issue recorded.</td> </tr> </tbody> </table> <p>Wildlife monitoring recorded via Summary of Wildlife/Animal/Bird sighted during patrolling for year 2021. List of common animals summary reported as per below:</p> <table border="1" data-bbox="1137 1007 1926 1318"> <thead> <tr> <th>Estate</th> <th>Monitoring date</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Kahang</td> <td>Long tailed macaque (4), red junglefowl (2), wild boar (3), monitor lizard (1) – October 2021,</td> <td>IUCN (least concerned)</td> </tr> <tr> <td>Mamor</td> <td>Long tailed macaque (3) – October 2021, reticulated python (1)</td> <td>IUCN (least concerned)</td> </tr> </tbody> </table> <p>Outcomes of the above monitoring are fed back into the management plan. High Conservation Value and Conservation Area</p>	Estate	Monitoring date	Remarks	Kahang	23/10/21, 23/9/21	No non-compliance issues reported	Mamor	28/7/21, 30/8/21, 16/9/21, 30/10/21	Steep hill (HCV4), no non-compliance issue recorded.	Estate	Monitoring date	Remarks	Kahang	Long tailed macaque (4), red junglefowl (2), wild boar (3), monitor lizard (1) – October 2021,	IUCN (least concerned)	Mamor	Long tailed macaque (3) – October 2021, reticulated python (1)	IUCN (least concerned)	Complied
Estate	Monitoring date	Remarks																			
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Mamor	28/7/21, 30/8/21, 16/9/21, 30/10/21	Steep hill (HCV4), no non-compliance issue recorded.																			
Estate	Monitoring date	Remarks																			
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Mamor	Long tailed macaque (3) – October 2021, reticulated python (1)	IUCN (least concerned)																			

		Management Action Plans & Continuous Improvement Plan dated 11/11/2021 is referred to. Adaptive management on the presence of RTE species was seen incorporated in the said management plan.	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Pamol POM certification unit.	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Pamol POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **Pamol POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.33
PK	0.33

Extraction	%
OER	23.41
KER	4.62

Production	t/yr
FFB Process	163,581.69
CPO Produced	38,299.47
PK Produced	7,554.82

Land Use	Ha
OP Planted Area	10,837.00
OP Planted on peat	0
Conservation (forested)	35.44
Conservation (non-forested)	34.59
Total	10,907.03

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	83,887.77	0.51	0	0	0	0	83,887.77	0.51
CO ₂ Emission from fertilizer	13,089.75	0.08	0	0	0	0	13,089.75	0.08
NO ₂ Emission	7,883.29	0.05	0	0	0	0	7,883.29	0.05
Fuel Consumption	1,104.67	0.01	0	0	0	0	1,104.67	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-74,416.91	-0.45	0	0	0	0	-74,416.91	-0.45
Conservation Sequestration	-159.45	0	0	0	0	0	-159.45	0
Total	31,389.12	0.19	0	0	0	0	31,389.12	0.19

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0	0.17
Fuel Consumption	298.22	0.02
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	-16,522.13	-0.10
Sales of EFB	0	0
Total	-16,223.91	-0.10

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

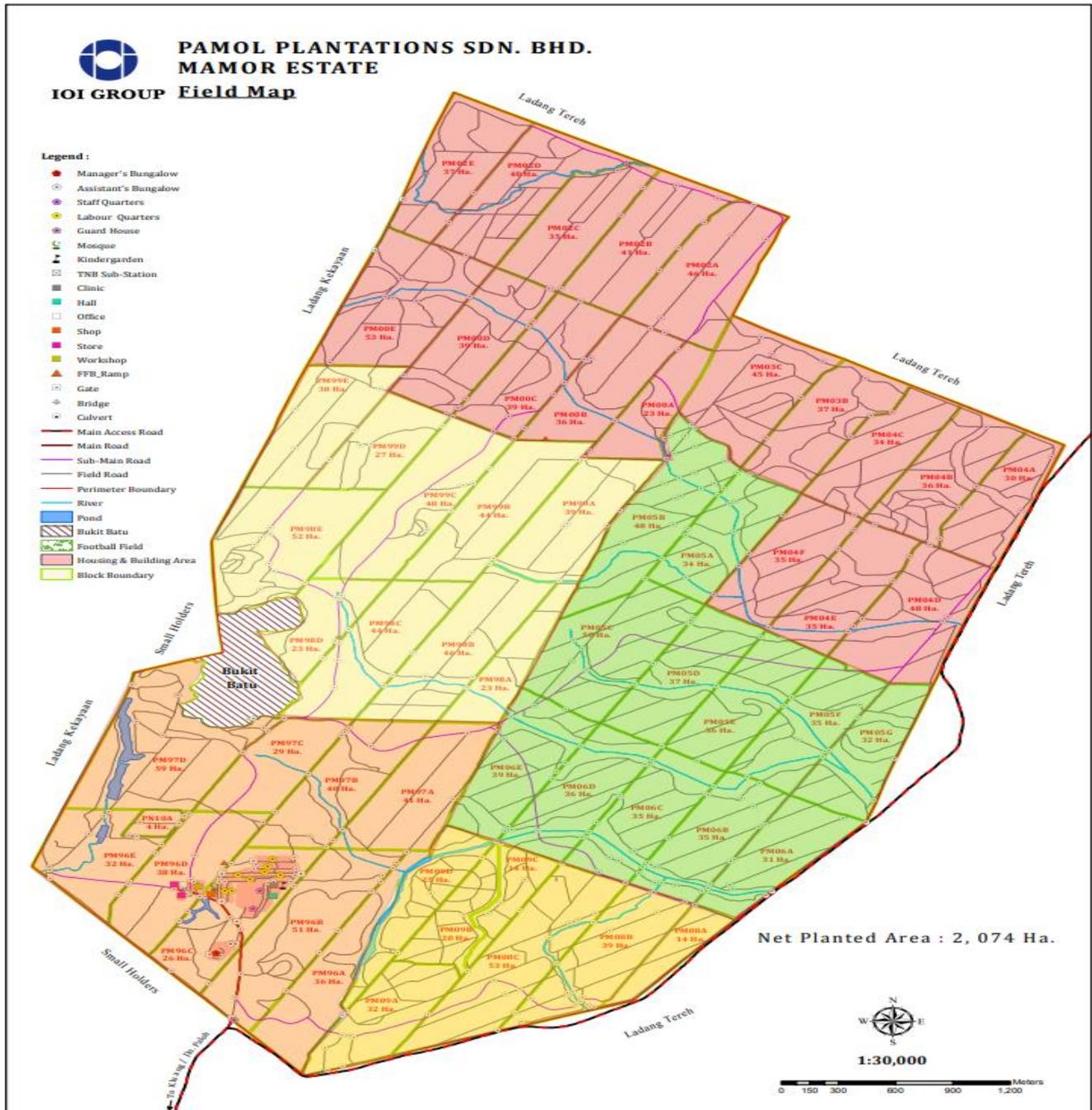
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

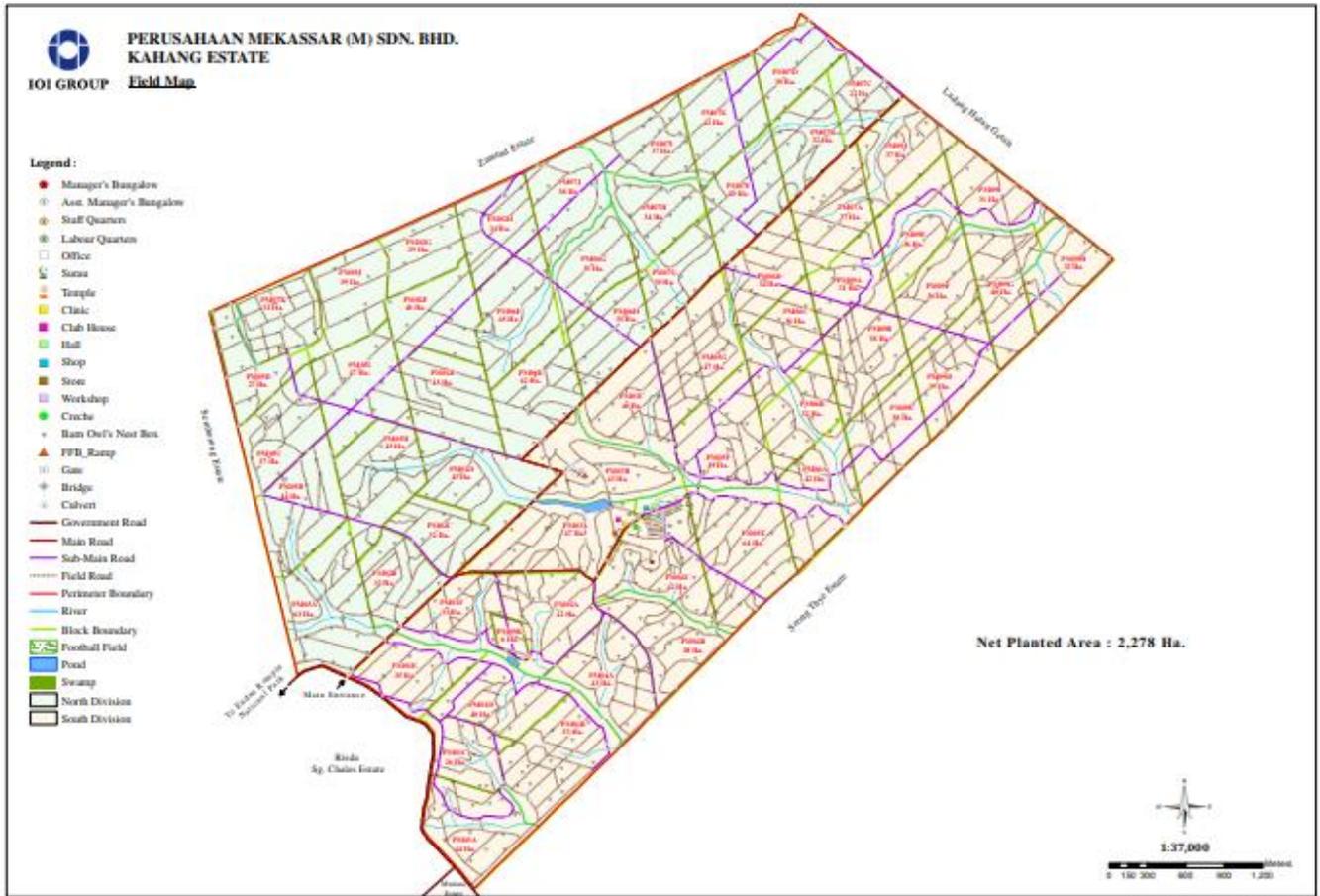


Appendix D: Estate Field Map

Mamor Estate



Kahang Estate



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