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PUBLIC SUMMARY REPORT

RSPO

THIRD ANNUAL SURVEILLANCE ASSESSMENT (ASA3)

IOI CORPORATION Bhd Pamol Kluang

Located in Kluang – Johor, Malaysia

Report Author:

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SUMMARY

BSi has conducted the Third Annual Surveillance Assessment (ASA3) of IOI Corporation Bhd Pamol Kluang operations located in Kluang – Johor, Malaysia comprising one mill, six company oil palm estates, support services and infrastructure. BSi concludes that IOI Pamol Kluang operations comply with the RSPO requirements [RSPO P&C MY-NI 2010; RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance; and Supply Chain Certification Standard: November 2011, Module D – CPO Mills: Segregation]

BSi recommends the continuation of the approval of IOI Pamol Kluang operations as a producer of RSPO Certified Sustainable Palm Oil.

ABBREVIATIONS USED

ASA1	Annual Surveillance Assessment 1
ASA2	Annual Surveillance Assessment 2
ASA3	Annual Surveillance Assessment 3
BOD	Biological Oxygen Demand
CAR	Corrective Action Request (for nonconformity)
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
IPM	Integrated Pest Management
MSDS	Material Safety Data Sheet
MY-NI	Malaysian National Interpretation
NUPW	National Union of Plantation Workers
PK	Palm Kernel
PPE	Personal Protective Equipment
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure

1.0 SCOPE OF CERTIFICATION ASSESSMENT

1.1 Identity of Certification Unit

The Pamol Kluang mill and estates are located in Johor, Malaysia (Figure 1). The oil mill is central to the estates located near Kluang – Johor, Malaysia. The GPS location of the mill is shown in Table 1.

Table 1: Mills GPS Locations

MILL	EASTING	NORTHING
Pamol Kluang (Capacity: 60 mt/hr)	103° 23' 24"	2°6' 36"

1.2 Production Volume

The estimated tonnages reported for the ASA2 and the actual production since previous year are detailed in Table 2. It should be noted that the Actual tonnages are for only part of a year from the date of ASA02 assessment on 16 March 2012 to 28 Feb 2013. The projected tonnages for the 2013–2014 period of the Certificate are based on the annual budget of three yearly bases.

Table 2: Production tonnages

Pamol Kluang Mill	Estimate at ASA2 16/03/12 – 15/03/13	Actual 16/03/12 – 28/02/13	Projected 16/03/13 – 15/03/14
CPO	55,025	48,148.63	64,895.00
PK	12,878	10,820.33	15,441.00

1.3 Certification details

RSPO Membership No: 2-0002-04-000-00

BSI RSPO Certificate No: SPO 547027

Date of previous Assessment (ASA2): 29/02/2012 – 2/03/2012

Date of Certification: 16/03/2010

1.4 Description of Supply Base and Supply Chain

The supply base is the FFB from six (6) IOI owned Estates that supplied 100.0% of the FFB processed at the Mill between 16 March 2012 and 28 Feb 2013. All of the IOI estates are RSPO-Certified. Pamol Mill is no longer received FFB from "IOI Resort". IOI ceased purchasing FFB from outgrowers in 2008 where since early 2012 it did not longer continue. The actual FFB production from IOI owned Estates for the second year of the Certificate (16 March 2012 – 28 Feb 2013) and projected for the third year of the Certificate are listed in Table 3. The projected tonnages were based to the potential yield achieved due to planting material and age profile of palms where within this year of 2013 the immature palms areas are converted into mature palms.

Table 3: Estate FFB Tonnages Processed

Source	Estimate at ASA2 16/03/12 – 15/03/13	Actual 16/03/12 – 28/02/13	Projected 16/03/13 – 15/03/14
Pamol Kluang Estates:			
1. Pamol Barat	39,630	39,865.30	45,100.00
2. Pamol Timur	29,260	26,092.37	33,020.00
3. Mamor	46,000	50,874.52	64,490.00
4. Unijaya	25,830	21,471.69	29,760.00
5. Swee Lam	29,940	28,430.94	37,730.00
6. Kahang	59,490	56,503.86	70,660.00
Sub Total	230,150	223,238.68	280,760.00
Other IOI Estate			
1. Bkt Serampang	--	--	--
2. Sagil	--	--	--

3. Segamat	--	--	--
4. Regent	--	--	--
5. Paya Lalang	--	--	--
6. Tambang	--	--	--
7. Bertam	--	--	--
8. Gomali	--	--	--
Sub Total	--	--	--
Outgrowers*			
1. IOI Resorts	--	--	--
2. Jasin Lalang	--	--	--
Sub Total	--	--	--
OVERAL TOTAL	230,150	223,238.68	280,760.00

The projected figures show increment compared with estimation at ASA2 and also with the actual productions. This is due to in 2013 there are some immature areas are converted into mature area which increasing FFB production in each estate. Approximately 2,000 ha of the Pamol Barat and Pamol Timur Estates were initially planted to oil palm in the 1940s and the palms are in their fourth cycle. The remainder of the land at these two estates was planted to the second cycle of oil palm in 1986. The other four estates (Mamor, Kahang, Unijaya and Swee Lam) within the Pamol group are in the second cycle of oil palm. The age profile of the palms is shown in Table 4a. The areas of mature and immature palms are detailed in Table 4b for each of the Estates.

Table 4a: Age Profile of Palms

AGE (years)	% of PLANTED AREA
31 – 35	—
21 – 30	30.1
11 – 20	21.7
4 – 10	32.6
0 – 3	15.6

**Table 4b: Estates and Areas Planted
(As of January 2013)**

Estate	Mature (ha)	Immature (ha)	Unplanted/others	Total
Pamol Barat	1,913	281	83.67	2,277.67
Pamol Timur	1,297	875	129.35	2,301.35
Mamor	2,115	0	115	2,230.00
Unijaya	1,122	72	66.64	1,260.64
Swee Lam	1,345	107	102.6	1,554.60
Kahang	2,288	0	132	2,420.00
TOTAL	10,080	1,335	629.26	12,044.26

1.5 Other Certifications Held

Pamol Kluang Mill has achieved ISCC certificate on 2011.

1.6 Organisational Information / Contact Person

IOI Corporation Bhd
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IOI Resort 62502 Putrajaya MALAYSIA
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1.7 Progress against Time Bound Plan

IOI Corporation Berhad owns and operates 12 Oil Mills with a supply base of 76 Estates in Peninsular Malaysia and Sabah. The crop from three additional IOI Estates (Sugut, Seiap and Tegai Estates) located in Sarawak, is processed at Mills owned by other companies who have not yet set a target date for RSPO Certification of their mills. IOI Corporation Berhad is implementing a programme to achieve RSPO Certified Sustainable Palm Oil for all of its 12 Oil Mills and 76 Estates in Malaysia by the end of 2016.

Latest progress of a claim breached by IOI against RSPO Code of Conduct 2.3 and Certification Systems 4.2.4 (c) where IOI has until February 2013 responded formally to the claims. One of the claims relates a land dispute at Sarawak and the other to land development in Indonesia. Up to 4th February 2013, RSPO Dispute Settlement Facility (DSF) has been requested to step-up pre-mediation works with the parties, with a view to bringing the parties to the table by July 2013, for further mediated negotiations to resolve the conflict. The RSPO Complaint Panel (formerly known as the Grievance Panel) has met up in November 2012 to review the status of the IOI-LTK case. The Panel recognizes the efforts and challenges faced by both parties in moving towards resolving the case. Meanwhile, the *Complaint Panel has agreed to lift the suspensions of new certifications by IOI with the exception of IOI-Pelita Plantation (Sarawak), which will not be certifiable until this dispute is being resolved.* For more information about the dispute and historical updates can be found on following website:

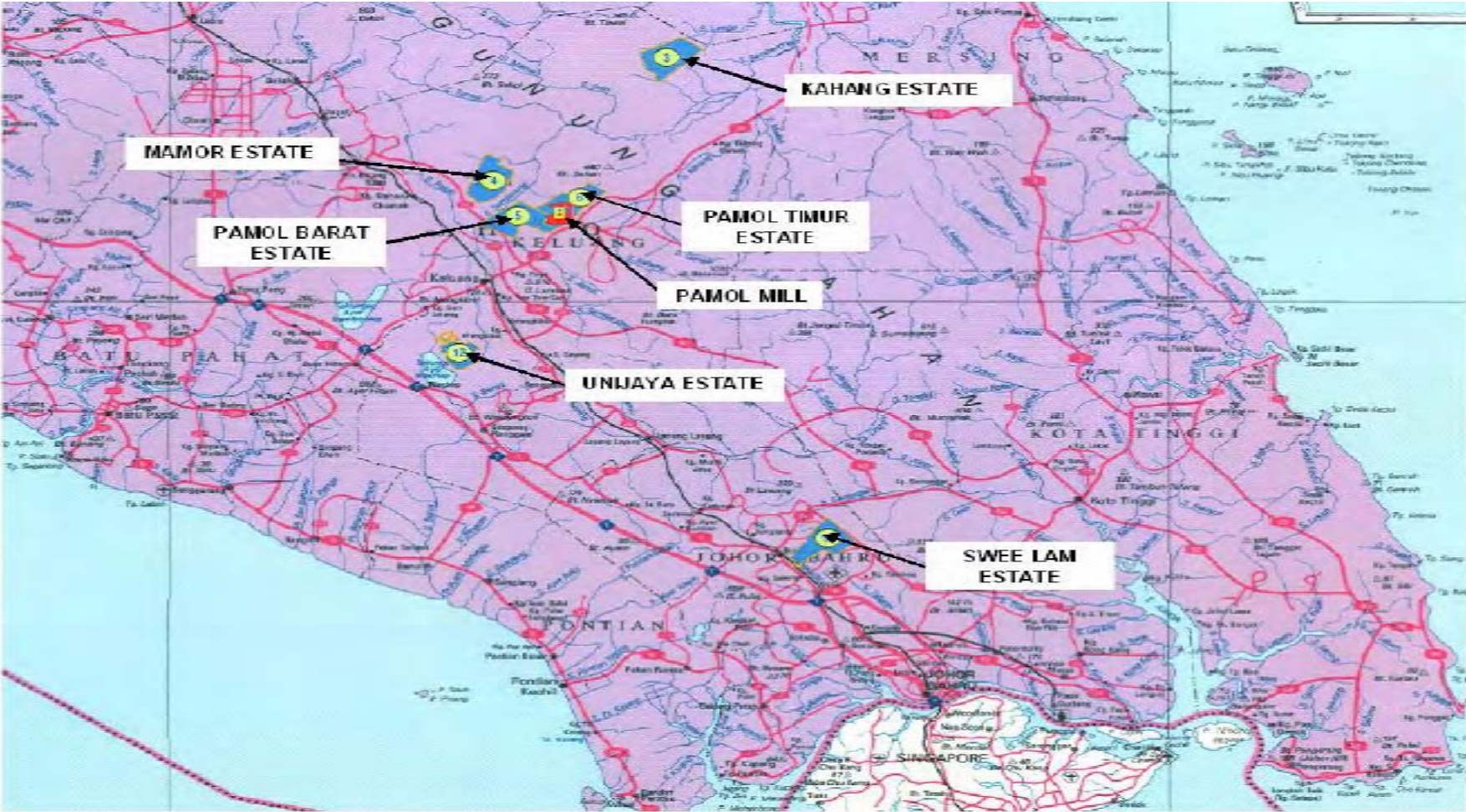
http://www.rspo.org/en/status_of_complaint&cpid=4

IOI has advised BSi that there presently are no labor disputes or any known legal non compliances at its oil palm operations. BSi has reviewed IOI's Time Bound Plan and considers the programme to be challenging to implement as it will require a uniform, across the geographic spread of its operations in Peninsular Malaysia, Sabah and Indonesia. BSi considers IOI's Time Bound Plan to conform to the RSPO requirements for Partial Certification, subject to the clarification and resolution of the claims. IOI Time Bound Plan is included as Appendix F.

Progress of Associated Smallholders/Outgrowers towards RSPO Compliance

IOI does not purchase crop from smallholders.

Figure 1. Pamol Kluang Location Maps



2.0 ASSESSMENT PROCESS

2.1 Certification Body

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BSi is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSi Standards is the UK's National Standards Body. BSi provides independent, third-party certification of management systems. BSi has a Regional Office in Singapore, and an Office in Kuala Lumpur and Jakarta.

2.2 Qualifications of the Lead Assessor and Assessment Team

Aryo Gustomo - Lead Assessor

He holds a degree in Agricultural Science majoring in Agronomy - on the subject of oil palm plantation management; He graduated from Bogor Agriculture University. He had more than 5 (five) years working experience related to oil palm industries i.e. as a Plant - Breeder/Agronomist -with one of the Malaysian oil palm seed producers and as a Field Assistant –with a oil palm plantation company in Indonesia. He has been involved in RSPO implementation and assessment since 2009 as a team member and subsequently as a lead auditor with a RSPO approved certification body covering assessment with RSPO P&C and RSPO NPP in Malaysia and Indonesia. - He has completed several training programmes on - ISO 9001, 14001 and attended the RSPO Lead Auditor courses as well as trainings on HCV identification and management. Currently, he works for BSi Group as a RSPO Scheme Manager for ASEAN and is a RSPO lead auditor/auditor. He has an excellent oral and written command of Bahasa Indonesia and English. During this assessment, he assessed on the aspect of legal, environment, HCV, mill and estate best practices, working safety and emergency preparedness, and supply chain requirement for CPO mill.

Muhammad Haris B. Abdullah – Auditor

He is a Malaysian citizen and has graduated from the Open University Malaysia with a Bachelor of Business Administration (Hons) Majored in Human Resource Development and currently pursuing his Master's Degree in Business Administration from the University Utara Malaysia. He has more than 3 years working experience in oil palm plantation and conducting social impact assessments of agriculture sector, agriculture best practices, and environmental impact assessment as

well as workers welfare. He had assisted with conducting audits of oil palm plantation for more than 8 companies against the RSPO P&C in Malaysia for the past 4 years. During this assessment, he assessed on the aspect of Legal, Social and community engagements, Stakeholders consultation, and workers welfare.

2.3 Assessment Methodology, Programme, Site Visits

The Initial Certification Audit was conducted between 17 and 20 March 2009. The first Annual Surveillance Assessment (ASA1) was conducted between 08 and 10 March 2011. The Second Annual Surveillance Assessment (ASA2) was conducted on 29 Feb 2012 until 2 March 2012.

The Third Annual Surveillance Assessment (ASA3) was conducted on 15-17 January 2013. The audit programme is included as Appendix C.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (two samples were chosen i.e. Pamol Timur Estate and Pamol Barat Estate). A range of environmental and social factors were covered. These included consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families, review of documentation and monitoring data. Checklists of standard requirements were used to guide the collection of information. The comments made by external stakeholders were also taken into account in the assessment.

The Nonconformities that were assigned and the Observations that were identified during the ASA2 were followed up to check the effectiveness of corrective actions. The ASA3 findings are detailed in Section 3.2 Page 12.

This report is structured to provide a summary for each Principle, together with details for selected Criterion and indicators. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

Mr. Senniah Appalasamy, who has been involved in BSi RSPO activities and one of the BSi internal reviewer, reviewed this report for conformance with BSi Procedure, RSPO Certification System and RSPO Procedure for Annual Surveillance Assessment.

2.4 Stakeholder 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's environmental and social performance.

Meetings and phone call 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 and phone call, 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 Appendix E.

2.5 Date of Next Surveillance Visit

The date of next surveillance visit will be approximately scheduled on January 2014

3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

As outlined in Section 2.3, objective evidence was obtained separately for each Principle, together with details for selected Criterion and indicators for the Mill and the Estates. The results for each selected Criterion and indicator from each of these operational areas have been aggregated to provide an assessment of overall conformance of the Company's operations with conclusion of each Criterion. A statement is provided for each of the Indicators to support the finding of the assessment team.

During the ASA3, there were four (4) Nonconformities and seven Observations/Opportunities for improvement were identified. IOI Pamol Kluang operations have prepared a Corrective Action Plan (Appendix D) for addressing the identified nonconformities that was reviewed and accepted by BSi.

Two Nonconformities were assigned during the ASA2 against Minor Compliance Indicators 2.2.3.1 and 5.5.3, and also the seven Observations that were identified were also followed up to check the effectiveness of corrective actions – Refer Section 3.3 Page 13 for details.

BSi recommends continuation of Certification for IOI Pamol Kluang operations as a producer of RSPO Certified Sustainable Palm Oil.

PRINCIPLE 1: Commitment to Transparency

Mill and estate maintained record of request and replies to the request from external and internal stakeholders. Public documents are also in place and kept properly.

Criterion 1.1: Oil palm growers and millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages & forms to allow for effective participation in decision making.

All the request and responses are recorded in grievances file. For example in Pamol Barat: There was a request from the Indian temple head for water tank for temple festival on the 1/9/2012 and the management approved and responded on the same day.

Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

IOI maintained public documents at the mill and estates; for example visit to Pamol Timur and Pamol Barat Estates held each copy of management documents (land titles/user right, health and safety plan, plan and impact assessment relating to environmental and social impacts, and other related documents). Sample records taken: copy of Land title of Pamol Timur Estate e.g. CT 1817 for 980 acre, CT 1818 for 1,096 acre, and G16591 for 2,000 acre; Copy of Land Title of Pamol Barat Estate e.g. G56272, QTR791, QTR790, T17850 and G16591 for the total of 2192ha; Environmental Impact Assessment updated on December 2012; Safety and Health Programme for the Year 2013.

PRINCIPLE 2: Compliance with Applicable Laws and Regulations

Inspection of records showed the Pamol Kluang Mill and its Estates complied with all of their respective permit conditions and legal requirements. This confirmed that the internal audits and checks were effective for monitoring compliance. IOI Pamol Kluang operation holds a site permits land use and no major land issues were sighted. However some the boundary stones were maintained at sampled Estates visited while other were not sighted.

Criterion 2.1 – There is compliance with all applicable local, national and ratified international laws and regulations.

The Mill and Estates have kept an up to date list of legal requirements, latest update on January 2013. The latest update regulation was also listed, i.e. Minimum Wage Order 2012. Company has kept mechanism to ensure all relevant legal requirements are comply, record name: document of Mechanism on Tracking of Law Changes which includes list of laws, regulation reference, permit and license to manage. The Sustainability team ensures the mechanism is implemented properly by checking regularly once a year. In addition, each operation has a

List of Licenses showing the expiry dates and these are updated. Example: Certificate of Boiler number 1 Inspection in accordance to Act 1970 – *Factories and Machinery Part II 10*; last inspection was 3 October 2012.

Review of internal audit reports showed that the Mill and the Estates visited had maintained legal compliance with applicable laws and regulations, in particular for Safety, Social, and Environmental regulations. The latest internal audit was January 2013.

*Follow up on the previous Observation 01 and 02 (2.1.1): Progress on the renewal letter from SPAN, even though company has fulfilled requirement for renewal by submitting routine report on 5 October 2012, however company need to follow up the progress of getting renewal letter from SPAN. Auditor concluded this observation remain open (**Observation 01**) and will be checked during subsequent surveillance visits.*

Follow up from previous Observation 03 (2.1.1): Pamol Mill has now ensure all the waste chemical were kept not longer than 180 days in accordance to (Schedule waste) regulation, 2005. Company is now implementing E-Consignment registration through on line for schedule waste report to the relevant government. It has been updated once a month throughout <http://eswis.doe.gov.my>. All records show no schedule waste was kept over the limited permit. The licensed facilitators engaged were Kualiti Alam Sdn Bhd for transporting laboratories wastes, while OLST for transporting hydraulic oil, lubricant oil, and contaminated containers.

During the ASA03, **Observation 02 (2.1.1)** was raised related to Approval application of generator and boiler to DOE where it has been submitted on 21 December 2012, however the mill should follow up to obtain the approval application. Progress will be checked during subsequent surveillance visit.

Criterion 2.2 – The right to use the land can be demonstrated and is not legitimately contested by local communities with demonstrable rights.

Company hold complete sets of land titles certificate registration. The land is not encumbered by Customary Rights and the right to use the land is not disputed. Review on two estates sampled confirmed land title certificate was in place. For example: Pamol Timur Estate holds five land titles number CT1817, CT 1818, G 16590, G 16591, and G17850 for total area of 6,121 acre (or equal with 2,479 ha); while in Pamol Barat Estate holds land title number: G56272, QTR791, QTR790, T17850 and G16591 for the total of 2192ha.

Boundary stones are marked by packs. Review on documentation of two sampled Estates found the maps showing the locations of boundary stones that have been physically located and marked. The estates have also continuously implementing a Boundary marking Programme started on January to December 2013. Inspection of sample of boundary stones at Pamol Barat

Estate confirmed they were clearly marked with red and white paint, Example: Boundary with small holder (Joe Lambori) at field No. 12B visibly maintained. However, inspection to Pamol Timur Estate boundary area adjacent to government road reserve, found no boundary marks were available. **Minor NC was raised against indicator 2.2.3.1**

Follow up from previous Minor NC against indicator 2.2.3.1 (reference number A694301/1): Unijaya Estate has provided a plan to monitor and maintain the boundary stone started on 2012 until 2015. Evidence of record: Boundary Stone/Marking Upkeep Programme. The programme is including repainting, slashing of weeds and repairing the current identified boundary stones. Up to January 2013, the implementation of the program was done for 11 field blocks. Auditor has satisfied and considers the nonconformity is closed on 17 January 2013.

Criterion 2.3 – Use of the land for oil palm does not diminish the legal rights of other users without their free, prior and informed consent.

Auditor concludes similarity to previous ASA02 findings. The Mill and Estates are on Freehold Land that IOI acquired in 2003 from the Unilever Plantation Group. IOI does not restrict access through the estates, except in relation to trucks. Interview of local community representatives confirmed there is no land dispute or any claim of customary land within the Estates. Interview with some neighbor local villager during ASA03 confirmed no land dispute within the estate.

PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability

IOI has well developed internal management system for monitoring and improvement of their operating unit against operation target to achieved long term economic and financial viability. In addition IOI Research Centre conduct investigation toward production related issue and provide technical assistant for the estate.

Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.

Latest 5 year business plan has been provided for Mill and Estates operation. For example: Five Years Business Management Plan of Pamol Mill 2013/2014 up to 2015/2016, consists of projection of FFB processed, OER, KER, and Expenditure cost; while at Pamol Timur and Pamol Barat Estates were provided in term of Five Years Business Plan 2011/2012 to 2015/2016 consist of crop projection, expenditure cost, and other financial factors. However **Observation 03 against indicator 3.1.1** raised : *it is should be clearly indicated the social and environment activities are included in Five Year Business Plan of Pamol Timur Estate.*

Review on documentation at two sampled Estates found Replanting Programme is in place. Pamol Timur Estate has ongoing replanting activities started on 2008 where estimation of the completion dates by 2015. However, it was no documented evidence showing yearly review of replanting programme has been conducted. **Minor NC has raised against indicator 3.1.2**

PRINCIPLE 4: Use of Appropriate Best Practices by the Growers and Millers

IOI has been consistently implemented management systems for monitoring and control of best practice implementation at its Mill and Estates. This includes a programme of regular internal audits by the General Manager.

Criterion 4.1: Operating procedures are appropriately documented and consistently implemented and monitored.

IOI maintained Group Palm Oil Mill Standard Operating Procedures (SOPs) issued on April 2008 (mill) and December 2008 (estates). Revised SOP for Buffalo Assisted Harvesting System (BAHS) was checked.

No new issue has been found against this criterion.

Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility, to a level that ensures optimal and sustained yield.

Leaf and soil sampling and visual analysis were routinely conducted once a year with latest result on 2012. The result is used as fertilizer recommendation for year 2013. Record held on file "IOI Research Centre".

Estate manager alongside with Research Centre carried monitoring of fertiliser application once a month. Record held on similar file as previous year i.e. "Summary of Monthly Fertiliser Application Monitoring Report", records are held in each estate division, estate manager office, and research centre.

Monitoring of application of EFB, POME and zero burning during replanting for 2013 were sighted in Estate Monthly Report, held in Estate manager office.

Criterion 4.3: Practices minimise and control erosion and degradation of soils.

Visit to some plots of two sampled estates (i.e. Pamol Timur and Pamol Barat) found consistencies implementation of ground cover maintenance with soft grass and *Nephrolepis sp* vegetation serves as ground cover in certain slope areas as per SOPs. IOI is committed to avoid or to minimize bare soil within the estates, by practicing selective weeding throughout chemical application.

Road Maintenance Programme for 2013 is available in Pamol Timur and Pamol Barat Estates. Record held in estate manager office. During audit, road inspected are mostly in a good condition, for example road condition around Block number PR-11D.

There are no peat soils or soil categorised as problematic or fragile soil at all estates (all are categorised as both Rengam and Jerangau").

Criterion 4.4: Practices maintain the quality and availability of surface and groundwater.

Estate has consistently maintained a programme to reinstatement of riparian strips of 3.5 meter at both side of the stream during replanting and is implemented. Inspection to water stream located in Block PR-11D Pamol Timur Estate confirmed that buffer zone have been set aside for reinstatement in replanting area. No bunds/weirs/dams were constructed across the main waterways in the estate.

Water analysis in the river (upstream, midstream, and downstream) was done once a year with the last sampling was on 19 September 2012, conducted by Analytical Resources laboratory. The results shown all relevant parameters are complied with Class III of WQI (Water Quality Index), for example pH, COD, and BOD. Company kept the Water Quality Monitoring Report in the Mill and Estates office.

Mill and Estates maintained a monthly monitoring of rainfall data, record held on file "Rainfall Report" and up to date until January 2013.

Pamol Kluang mill has maintained monitoring of daily water usage for Mill processing and domestic consumption (M3/tonne FFB) and it recorded every month. Sample record reviewed by auditor was Water consumption of Pamol Mill – December 2012 to January 2013. Similar to previous year, Mill Manager admitted that the water consumption is normal condition even the domestic consumption was higher unit cost due to low FFB processed during that period.

Pamol Mill and its estates had consistently implemented a Water Management Plans. Water supplies for estate housing were drawn from small stream inside the estate where the testing was done once a year with latest testing was 17 September 2012 for Pamol Timur and Mill housings. The result has been reported to Environment Department. Document review confirms that all relevant parameters were meet standard of WHO standard and Malaysian National Drinking Water Quality Standard.

However, **Minor NC was raised against indicator 4.4.4 and 4.4.7 (reference Number: A834990/3): It is found that rainfall data monitoring is not considered as a part of water management plan.**

Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

The estates have continued to implement biological control pest in the plantation, for example in Pamol Barat Estate, 163 Barn owl boxes were installed, where 150 were occupied as at November 2012. Rat damage censuses are done in each field to identify the actual damage level and controlling of rat bait usage. Beneficial plans such as *Tunera sp* and *Antigonon sp* also planted around the estate and it was sighted during field visits.

Estate committed to prioritize biological pest control rather than chemical means. Chemical will be applied when the pest census result exceed allowable limit. Monitoring of pesticide use is held by estate in term of per ton FFB and per ton CPO; Record shows small quantity of chemical was used. Record of pesticide usage was held on file "Estate Management Plan".

Criterion 4.6: Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives and this is documented.

Inspection of the Chemical Stores and records of Pamol Timur and Pamol Barat Estates confirmed the Estates hold and use only chemicals that are registered under the Pesticides Act 1974. There were also no Class 1&2 agrochemical stored in the chemical store. MSDS are available at stores. No *Monocrotophos* was stored.

Follow up from previous Observation 04 against indicator 4.6.2: Swee Lam Estate has removed the 8 liters of Monocrotophos from the chemical store of Swee Lam Estate 7 March 2012. Collection Transportation Instruction from Kualiti Alam (Authorized contractor by DOE) for collection and disposal of the expired Monocrotophos as chemical waste has been obtained

Estates are now implementing a Medical surveillance every 6 month for all workers related to chemical. The last medical surveillance was done December 2012. Interview with some sprayers and chemical store housekeeper have gained routine medical check up. Records of worker medical check were held in Mill and Estates offices. No serious medical problems were detected during that time.

Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented.

Safety Management Plan for 2013 is in place, prepared on January 2013. This was sighted in Pamol Mill, Pamol Timur and Pamol Barat Estates

Safety and Health Programme for 2013 was also prepared, consists of Safety and health committee

meeting, health surveillance, emergency response team meeting, emergency drills and training related to health and safety for workers.

Record of latest safety meeting committee was on 28 December 2012.

Risks assessment (HIRARC) for each activity on the Mill and Estates is available, latest update on 25 June 2012. Internal risks assessment was conducted by Safety officer.

Record of work accident for 2012 is in place in the Mill and Estates. Lost working time due to accident is also identified. Review of work accident monitoring record was carried out internally within Safety Committee meeting every three month. Latest record of safety committee meeting on September and December 2012 showed work accident has been reviewed and discussed. Most of work accident happened were minor injuries, while fatal injury resulting to death did not occurred during 2012.

Reviewed on workers profile records found all the workers are covered by the accident insurances. Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial) and MSIG Insurance; while for foreign workers is covered by Foreign Workers Compensation Scheme. All the insurance registration is still valid.

However, during field visit to the mill, auditor found Observation 04 (4.7.1) for some areas, such as:

- *Safety and health signages should be considered and available at high risk area as per internal risk assessment. For example: in Mill stations (sterilizer, pressing, chemical store).*
- *It is consider providing mask for operator who works in Pressing Station at the mill to prevent dust contamination.*
- *Routine checking on fire host reel at the mill need to be done to ensure is in working condition at any time, and to avoid use for washing floor.*

Criterion 4.8: All staff, workers, smallholders and contractors are appropriately trained.

Auditor team was not assessed in detail for this Criterion due to surveillance visit rules is allowed to assess selected criterion. However, during this assessment, auditor found in general most of the staff and workers are able to demonstrate their capability for each work; where it means that proper training have been gained. Evidence observed by auditor was based on interview with several workers and staff such as Chemical sprayer and store keeper, harvesters, mill boiler and engine room operators, estate field supervisor, estate field assistant, Estate and Mill managers, as well as EFB contractor.

PRINCIPLE 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored to demonstrate continuous improvement.

The latest annual review of environmental impacts in term of Environmental Impact Assessment management Action Plans and Continuous Improvement Plans was on December 2012 for its implementation of 2013. The record was held in the Mill and Estates offices.

A list of Actions for Improvement of environmental performance has been revised for each of the significant impacts. For example: At the Mill, construction of two additional effluent cooling ponds to improve the POME effluent treatment system, Planning on installing methane gas emission avoiding system (Green Tube) into the current effluent treatment system.

Criterion 5.2: The status of rare, threatened or endangered species and high conservation value habitats if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations.

Similar to previous year, at the time of the original development all of the land within the Estate leases was planted to oil palm except for a number of small Government Riparian Reserves and steep hillsides. IOI has carried out an assessment of the possible presence of HCVs within and adjacent to the Estates. The report was held in each Estate office.

Visit to Pamol Timur and Pamol Barat Estates, mostly the HCV area identified as HCV 6. IOI has prepared a Management Plan for protection and maintenance. HCV areas are properly maintained with visible signages. E.g: Indian temple and Mosque near the estate office clearly stated as HCV 6 and properly maintained. Meanwhile in other area identified as riparian reserves, the Estates have maintained the signboards at prominent areas to prohibit hunting, disturbance of protected areas, avoid chemical contamination to the water stream, etc.

For other identified HCV areas at non-sample estates during ASA03 will be checked within subsequent surveillance visits.

Criterion 5.3: Waste is reduced recycled, re-used and disposed of in an environmentally and socially responsible manner.

Latest update of Environmental Impact Assessment and Action Plan was on December 2012 indicating all the environmental impacts and action plan throughout

the year to mitigate the impacts are clearly stated and monitored.

The company has continued managing scheduled waste stores at the Mill and each of the Estates not to less than 180 days in accordance with the requirements of the *Environmental Quality Act 1974 (Scheduled Wastes) Regulations, 2005*. For example: Schedule waste records are available in the SH 16 file. Schedule wastes are disposed through license collector (OLST PETRO-Chemical Sdn. Bhd.). E.g: SW 409 has been sent on the 31/12/2012.

There are complete sets of monitoring report on the scheduled waste that reported every 6 months to the related institution.

However, **Minor nonconformity raised against indicator 5.3.2 (reference number A834990/4):** Based on field visit, it is found two effluent ponds were potentially overflowing and going nearby the water stream. Correction taken by the mill is to build the safety bund and maintain the effluent level is 1 foot below. However, the proper corrective action shall be taken to prevent repetition of potential overflowing of effluent is happening.

Criterion 5.4: Efficiency of energy use and use of renewable energy is maximised.

The company has optimized the use of renewable energy since 2008 as sighted in report books. There was increased use of diesel fuel in 2011 to 2012 as back up due to the extended dry season and lower quantity of crop processed. In the mean time, the mill has considered using power electricity from the government (Tenaga Nasional Berhad) as power supply during low production and mill processing hours are lower.

Criterion 5.5: Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situation, as identified in the ASEAN guidelines or other regional best practice.

IOI has implemented Zero burning policies in all workplace areas at the Mill and estates.

Follow up from previous Minor nonconformity against indicator 5.5.3 (reference number: A694301/2): The estate management produced a Memo for all workers stating prohibition of open burning in housing, mosque, and all estate areas. Further, the estate has installed two signboards in surrounding worker housing area. Estate management had progressively encouraged all the workers to prohibit open burning in surrounding estate area. The nonconformity is considered closed on 17 January 2013.

Inspection to worker housing of Pamol Timur and Pamol Barat Estates, and also to Mill worker housing, found no evidence of burning waste including domestic waste. Recycling programme for domestic waste is being

carried out and also segregation is done before land fill at each collection center.

Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases are developed, implemented and monitored.

The Mill and Estates Pollution Prevention Plan is documented in the Environmental Impacts Identification and Improvement Plan, prepared September 2008 with the latest reviewed on December 2012. Inspection confirmed the Mill and Estates have implemented appropriate controls for preventing pollution from point source emissions to air and discharges of wastewater, such as the mill monsoon drains.

Smoke emission quality test at the mill was done every 6 month in accordance to the Environmental Quality (Clean Air) Regulation 1928. The test was conducted by the Environment Consultancy & Monitoring Services Sdn Bhd. The latest test was on semester two of 2012 where all parameters were complied with the standard requirements. E.g. dust, NOx, Sox, and Dark Smoke.

PRINCIPLE 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers

Criterion 6.1: Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

SIA was prepared on September 2008 with the participation of local community and updated annually. The social action plan was reviewed and updated on December 2012 based on input received during public consultation stakeholders carried out on November 2012 respectively. The meeting was attended by internal stakeholders (staffs and workers) and external stakeholders (contractors, suppliers, NUPW, AMESU, neighbouring estates, and local village representative) Record of meeting with attendance list and minute of meeting are available as attachment.

Follow up from previous Observation 05 (6.1.1): Latest SIA's Action plan (December 2012) has improved by giving attention on the most important issues such as donation to the school and local village.

Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

Similar to ASA02, the Consultation and communication procedure for stakeholders is maintained through IOI website: www.ioigroup.com otherwise for those who do not have Internet connection follows Stakeholders Request Procedure. Verbal request by phone call IOI

Group General Line: +60389478888 or written request to Two IOI Square, IOI resort, 62502 Putrajaya, Malaysia. Written procedure held on file Management Plan point 10.0 Stakeholders Request Procedure.

Social Liaison Officer or Estate Manager (or Estate Manager) is the person responsible for communications with communities and other stakeholders.

A formal list of stakeholder has been prepared consisting of local communities, neighbouring estates, government offices, suppliers, contractors, workers, NGO, doctors, consultants, banks, external auditors complete with address, contact number and persons in charge updated on December 2012. Records are held on file List of Stakeholders.

Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.

Similar to previous ASA02, a grievance procedure has been developed and included in the "Management Plan". Complaint and grievances have been recorded in "Complaint/Grievance Book" since July 2007. The "Grievance/Complaints" book is used to record all enquiries not only complaints and grievances. Inspection of the records indicated that the system resolved all disputes in a timely manner.

Follow up from previous Observation 06 (6.3.1): Unijaya Estate has now notifying the progress of status for each complaint received from internal stakeholder in the Complaint and Grievance Book. The estate has consistently maintained the records and up to date.

There were no documented external disputes at the time of the audit. The ECC (Employment Consultative Committee) is open to external parties including foreign workers. It was confirmed during interview that foreign workers have their representatives in ECC.

Criterion 6.4: Any negotiations concerning compensation for loss of legal or customary 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.

Similar to ASA02, IOI maintained a procedure of "Grievance Procedure of Land Owner Issues" that is applicable for assessing legal and customary land issue. The procedures is available on "Group Social Impact Assessments and Management Action Plan" dated 25 January 2008.

IOI has purchase the Pamol Group in 2003 and there has been no land issue since then. Interview of local community (such as Kampong Pangkalan Terek and

Kampong Fajah) confirmed that currently no outstanding land dispute in this property.

Criterion 6.5: Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

Similar to ASA02, the migrant workers from Indonesia make up the majority of the workforce, with smaller numbers from Myanmar, Nepal, and Bangladesh who are engaged on 2 or 3 year contracts. Pay and conditions are documented in the employment agreement between the company and workers and calculated in line with the current MAPA/NUPW award rate. Inspection of contracts of both local and foreign workers confirmed that pay and conditions are available in Bahasa Malaysia, with some of them in Myanmar, Nepal, and Bangladesh languages.

Follow up from previous Observation 07 (6.5.2): Company has consistently maintained translation pay slip from English to appropriate languages (i.e. Bahasa Malaysia, Nepalese, and Bangladeshi). Interview with foreign workers from Indonesia, Bangladesh, Nepal, and Myanmar confirmed the understanding of payslip and wage structures.

Criterion 6.6: The employer respects the right 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.

Similar to previous ASa02, National level HQ of IOI held meeting with NUPW when required. At operating unit level NUPW representative meet regularly in Kluang office. NUPW Kluang representative has also been included in the public consultation as part of SIA Action Plan Review and Update. No significant issues gathered from worker union during the ASA03 assessment.

Criterion 6.7: Children are not employed or exploited. Work by children is acceptable on family farms, under adult supervision and when not interfering with education programmes. Children are not exposed to hazardous working conditions.

Inspection to one of employee contract agreement confirmed that copy of ID or passport for foreign worker is held, and found no workers are under age. During field visit children were not observed at any of the working place at both mill and estate. Interview with workers confirmed the understanding of company policy on children workers.

Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age is prohibited.

An equal opportunity policy is displayed at notice board at muster in mill and estates. Interview of male and female workers at the mill and estates confirmed understanding and awareness of the policy.

Criterion 6.9: A Policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.

Similar to ASA02, a Policy on Sexual harassment approved on 04 January 2008 is in place in workplaces at the mill and estates. A female staff's member has been appointed as gender committee member at every location. The company has developed specific grievance mechanism on sexual harassment and violence in Bahasa Malaysia. Female workers interview confirmed understanding of the mechanism and no issue was raised during the audit. **Observation 05 (6.9.2):** Gender committee of Pamol Barat is formed and latest meeting was done on the 27/11/2012 attended by 11 people. No issues were raised. However, minutes of the meeting should not be recorded in the Grievances record book.

Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.

Similar to ASA02, Mill only process FFB harvested from company estates. No FFB Reception from smallholders or outgrowers.

Interview with the EFB contractor (Ravi) reveals that the contract is clear and payments are made on time as per the contract.

However, **Observation 06 (6.10.3):** it was found the contracted truck driver is not using proper PPE (helmet) in loading ramp area at the mill. The awareness and socialization need to be done to ensure all contractors are fulfilling the safety requirements.

Criterion 6.11: Growers and millers contribute to local sustainable development wherever appropriate.

Similar to ASA02, the company has continuously cooperated with government to allow electricity transmission along estate concession totalling 10.74 ha. The estate has provided access to registered smallholders to pass through company road. Company make donation to local schools, assisted underprivileged student through purchase of teaching aids and supplies. Maintenance of road for Pengkalan Terek village by the estate is continuously being carried out. Free grass cutting service for Tereh School.

Principle 7: Responsible Development of New Plantings

Pamol Kluang Group has not carried out any new oil palm developments and there are no plans for expansion of plantings. Principle 7 is not applicable to this Assessment.

PRINCIPLE 8: Commitment to Continuous Improvement in Key Areas of Activity

Criterion 8.1: Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

IOI has carried out an annual review of the environmental and social aspects of Pamol Kluang operations, with a view to identifying improvements. With point sources of pollutants well controlled, the company's Improvement Plan is to reduce the use of fossil fuels as much as practical through the use of the steam turbine to generate electricity and optimisation of FFB transport. The Social Action Plan has continued to work towards improving stakeholder relationship through engagement and dialogue.

Government water supply for workers housing is completed and started to fully function on end of Jan 2013. Four units of new staff houses are also budgeted in 2013 annual budget.

3.2 Detailed Identified Nonconformities, Corrective Actions and Auditor Conclusions

Corrective actions with respect to two nonconformities raised at the last assessment have been reviewed and found to be effectively implemented. During ASA3, four Minor Nonconformities and seven Observations/Opportunities for improvement were identified. Pamol Kluang has prepared Corrective Action Plan for addressing the identified Nonconformity – See Appendix D. The Audit Team has reviewed and accepted the Pamol Kluang Corrective Action Plan. Implementation of corrective actions will be followed up during the next Surveillance Assessment (ASA4).

Major Nonconformity

No Major nonconformity was raised.

Minor Nonconformities

Four Nonconformities were assigned against Minor Compliance Indicators 2.2.3.1; 3.1.2; 4.4.4/4.4.7; and 5.3.2. The details of these Nonconformities are provided below:

A834990/1: (2.2.3.1) It was not found any boundary marks alongside the government road reserve adjacent to the Pamol Timur estate area.

A834990/2: (3.1.2) No documented evidence showing yearly review of replanting programme has been conducted. For example: replanting programme of Pamol Timur Estate.

A834990/3: (4.4.4/4.4.7) At Pamol Mill and Pamol Timur Estate, it is found that rainfall data monitoring is not consider as a part of water management plan.

A834990/4: (5.3.2) Based on field visit, it is found two effluent ponds was potentially over flow and go to nearby the water stream. Correction taken by the mill is to build the safety bund and maintain the effluent level is 1 feet below. However, the proper corrective action shall be taken to prevent repetition of potential over flow of effluent is happening.

Observation/Opportunity for improvement

There are Seven Observations/Opportunities for improvements were identified. The progress with the Observations/Opportunities for Improvement will be checked at the next Annual Surveillance Assessment (ASA4). The Details are of below:

OBS1 (2.1.1): Progress on the renewal letter from SPAN as previous Observation 01 and 02 during ASA2; Even though company has fulfil requirement for renewal letter by submitting routine report on 5 October 2012, however company need to follow up the progress of getting renewal letter from SPAN, where until this assessment there is no official response from SPAN. Auditor concluded this observation remain open and will be checked during subsequent surveillance visits.

OBS2 (2.1.1): Approval application of generator and boiler to DOE has been submitted on 21 December 2012, however the mill should follow up to obtain the approval and the progress will be checked during subsequent surveillance visit.

OBS3 (3.1.1): it is should be clearly indicated the social and environment activities are included in Five Year Business Plan of Pamol Timur Estate

OBS4 (4.7.1): During field visit to the mill, auditor found several opportunities for improvement in some areas, such as:

- Safety and health signages should be considered and available at high risk area as per internal risk assessment. For example: in Mill stations (sterilizer, pressing, chemical store).
- It is consider providing mask for operator who works in Pressing Station at the mill to prevent dust contamination.
- Routine checking on fire host reel at the mill need to be done to ensure is in working condition at any time, and to avoid use for washing floor.

OBS5 (6.9.2): Gender committee of Pamol Barat is formed and latest meeting was done on the 27/11/2012 attended by 11 people. No issues were raised. However,

minutes of the meeting should not be recorded in the Grievances record book.

OBS6 (6.10.3): it was found the contracted truck driver is not using proper PPE (helmet) in loading ramp area at the mill. The awareness and socialization need to be done to ensure all contractors are fulfilling the safety requirements.

OBS7 (RSPO SCCS D.3.4): Inconsistency implementation of SOP No: RSPOSC/SOP/SG/2 regarding supply chain model stamping on the delivery order. For example: CSPO/IP was stamped instead of CSPO/SG as stated in the SOP.

Noteworthy Positive Components

- ✓ The Mill has consistently maximised the use of renewable fuel for generating electricity by running the steam turbine outside of processing hours.
- ✓ At the Estates, Company has maintained a system whereby buffalos that are purchased by the company for infield collection of FFB are then sold prior to completion of foreign worker contracts and the "sale proceeds" are distributed amongst the workers.
- ✓ Proceeds from the sale of "recyclables" collected from domestic waste are distributed to the residents.

3.3. Status of Nonconformities (Major and Minor) Previously Identified

Corrective Actions for Nonconformities identified during the ASA2 has been effectively and consistently implemented and the nonconformity remains closed.

Minor Nonconformities

A694301/1: (2.2.3.1) At Unijaya Estate, during field inspections found some of the boundary stones were not being located and visibly maintained. E.g. in Block PM90A and PR10A which are located nearby the smallholders area. Evidence observed by BSI was no programme is in place to monitor and maintaining the boundary stones within the estate.

ASA3 findings: Company has provided a plan to monitor and maintain the boundary stone started on 2012 until 2015. Evidence of record: Boundary Stone/Marking Upkeep Programme. The programme is include repainting, slashing of weeds and repairing the current identified boundary stones. Up to January 2013, the implementation of the program was done for 11 field blocks. **Auditor has satisfied and considers the nonconformity is closed on 17 January 2013.**

A694301/2: (5.5.3) At Swee Lam Estate housing, even though socialization toward zero burning has been carried out, however, inspection to the workers housing found evidence of burning waste. Company to conduct additional socialization session to raised workers awareness toward zero burning.

ASA3 findings: The estate management produced a Memo for all workers stating prohibition of open burning in housing, mosque, and all estate areas. Further, the estate has installed two signboards in surrounding worker housing area. Estate management had progressively encouraged all the workers to prohibit open burning in surrounding estate area. **The nonconformity is considered closed on 17 January 2013.**

Review of progress with Observations/Opportunities for improvement identified during Initial Certification assessment

OBS1 (2.1.1): Company has not been routinely reporting the water quality test results to SPAN as required by the permit.

ASA3 Findings: see Observation 01 raised during this assessment. Auditor considers this observation remain open and will be checked on next surveillance.

OBS2 (2.1.1): Company need to follow up to the SPAN on the renewal of license for using water and treatment (expired on 31 Dec 2011). The renewal letter has sent to the SPAN on 21 Dec 2011.

ASA3 Findings: see Observation 01 raised during this assessment. Auditor considers this observation remain open and will be checked on next surveillance

OBS3 (2.1.1): It is found at Pamol Mill, the waste chemical were kept over than 180 days which are not comply with Environmental Quality (Schedule waste) regulation, 2005. Evidence observed by BSI, the waste chemical were kept since 10 May 2011 and disposed to the licensed facilitator Kualiti Alam Sdn Bhd on 03 February 2012.

ASA3 Findings: Pamol Mill has now ensure all the waste chemical were kept not longer than 180 days in accordance to (Schedule waste) regulation, 2005. Company is now implementing E-Consignment registration through on line for schedule waste report to the relevant government. It has been updated once a month throughout <http://eswis.doe.gov.my>. All records show no schedule waste was kept over the limited permit. The licensed facilitators engaged were Kualiti Alam Sdn Bhd for transporting laboratories wastes, while OLS for transporting hydraulic oil, lubricant oil, and contaminated containers.

OBS4 (4.6.2): There are 8 litres of monocrotophos have been stored in chemical store of Swee Lam Estate since 2005. At the time of assessment there was no programme to phase out the storage of

monocrotophos. The last time using of monocrotophos was before 2010.

ASA3 findings: Swee Lam Estate has removed the 8 liters of Monocrotophos from the chemical store of Swee Lam Estate 7 March 2012. Collection Transportation Instruction from Kualiti Alam (Authorized contractor by DOE) for collection and disposal of the expired Monocrotophos as chemical waste has been obtained

OBS5 (6.1.1): *SIA Action plan can be improved by reviewing the implementation and reduce the number of programme to the manageable level and easy monitoring; attention should be given to the most important issues.*

ASA3 findings: Latest SIA's Action plan (December 2012) has improved by giving attention on the most important issues such as donation to the school and local village.

OBS6 (6.3.1): *At Unijaya Estate, the status for each complaint received from internal stakeholders need to be made clearer to show the progress of implementation. For example, Complaint and Grievance Book should record the status of compliant either in progress, or completed. The estate has taken an action by notifying the status for each particular complaint.*

ASA3 findings: Unijaya Estate has now notifying the progress of status for each complaint received from internal stakeholder in the Complaint and Grievance Book. The estate has consistently maintained the records and up to date.

OBS7 (6.5.2): *The company has just recently translating the payslip from English to Bahasa Malaysia, Nepalese, Bangladeshi. However interview of Indonesian harvester at Unijaya Estate found the he did not understand the payslip and wage structures. This is indicated the socialization has not been sufficiently carried out. The estate manager has taken an action immediately on 02 March 2012 by providing socialization to the harvester.*

ASA3 findings: Company has consistently maintained translation pay slip from English to appropriate languages (i.e. Bahasa Malaysia, Nepalese, and Bangladeshi). Interview with foreign workers from Indonesia, Bangladesh, Nepal, and Myanmar confirmed the understanding of payslip and wage structures.

3.4 Issues Raised By Stakeholders and Findings with Respect To Each Issue

During this ASA3, the majority of stakeholders had positive comments about Pamol Kluang. For the situations where stakeholders raised issues, the company's response is stated. The detail of stakeholders comment has provided below:

Government

Stakeholder comment: *Comment:* DOE officer highlighted an issue regarding Pamol Mills's approval for

Genset and one of the boilers was missing. However, the management has submitted the application for new license and received by DOE on the 21/12/2012 is pending for the approval from DOE.

Company Response: Company admitted the recent issue is correct and will follow up appropriately.

Auditor findings: Considered to assess indicator 2.1.1 in relation to mill licenses. Observation has raised against indicator.

Stakeholder comment: All the fire extinguishers in Pamol Estates are being checked and refilled annually by IOI Pamol Mill management through appointed contractor.

Company response: Agree with comment and will consistently implemented.

Auditor findings: Confirmed during field visit. Some fire extinguisher in Pamol Timur and Pamol Barat Estates are available and refilled annually.

Local communities

Stakeholder comment: Kampung Pengkalan Terek, village head commented that the Sembrong River has been polluted due to the Pamol mill operation and other outside mill operations. However, there were no direct discharges to the natural water course from the mill effluent ponds.

Company response: Company reveals that no effluent discharges to either water stream or river. Mill is applying effluent to land application. Company is also conducting routine check on water quality test of river and results show compliance with allowable limits.

Auditor findings: review document and field visits to the Pamol mill confirmed no effluent discharge direct to the river. Mill applies effluent to land application and monitor the water quality in accordance to allowable limits. Results of water quality test shows compliance to allowable limits.

Others

Stakeholder comment: Smallholder (Mr. Periasamy) highlighted that the charges for using estate road to bring out their FFB has been increased from RM 20 – RM 35 without any reason and he's not been briefed on the increments earlier.

Company response: the reason for increasing the charges was due to the AP escort and fee maintenance cost of the road. Also, this issue was clearly explained and agreed by the other entire small holder those who are using the estate road during stakeholder meeting which Periasamy did not attended even though he has been invited.

Auditor findings: Further verification with another local villager (Mr. Krishnan) revealed that Periasamy aware on company's reason and until today did not object. Auditor considers this issue is not supported with enough evidence.

Stakeholder comment: Mr. Periasamy also informed that the temple inside the estate should be re-located to other location near roadside since not many Indian workers are staying in the estate compound.

Company response: Estate allows outsiders to enter the temple for prayers. Therefore, it is not necessary to re-locate the temple.

Auditor findings: Interview with the temple head, Velu, disagrees on this issue as he claims that estate management has given full cooperation and assistance for all the temple activities and management. Estate also allows outside people to enter temple for praying.

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

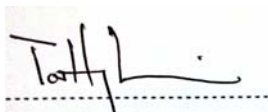
4.1 Date of Next Surveillance Visit

The next surveillance visit will be scheduled not later than twelve months of the ASA3 date.

4.2 Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

Please sign below to acknowledge receipt of the assessment visit described in this report and confirm the acceptance of the assessment report contents including assessment findings.

Signed for on behalf of
IOI Corporation Bhd – Pamol Kluang



Too Heng Liew
Head of Sustainability (Malaysia & Indonesia)
Date: 04/03/2013

Signed for on behalf of
BSi Group Singapore Pte Ltd



.....
Mr Aryo Gustomo
BSI RSPO Lead Auditor
Date: 04/03/2013

Appendix “A”

Supply Chain Certification Audits

Main Report Details

Standard: Supply Chain Certification requirement for CPO Mills – Module D Segregation

Location: Pamol Kluang Mill, Date: 15/01/2012

Total last transaction in UTZ system for period of March 2012 to December 2012 is 30,315.39 mt with the balance stock as per December 2012 is 22,958.95 mt. This was checked through eTrace system with total up the quantity entered in the months stated above (*Pamol Kluang has no transaction using Green Palm so far*)

D.1. Documented procedures

D.1.1 The facility shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:

a) Complete and up to date procedures covering the implementation of all the elements in these requirements.

Complies – Procedure is current and include all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products. I.e. SOP number RSPOSC/SOP/SG/2, dated 1st September 2012, Issue 2.

b) The name 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 facilities procedures for the implementation of this standard. *Complies – similar to previous ASA2, the Mill Manager has responsibility for the Supply Chain aspects of FFB receipts, processing and shipping of palm products. Interview confirmed their knowledge of the RSPO Supply Chain requirements for the respective areas of the operations*

D.1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFB.

Procedure No RSPOSC/SOP/SG/2 is cover receiving of FFB from certified supply base, processing and storage, and recording the dispatch of certified oil and palm kernel.

D.2. Purchasing and goods in

D.2.1 The facility shall verify and document the volumes of certified and non-certified FFBs received. *Complies – the Mill records tonnages received at the weighbridge and these are reported daily to Head Office.*

D.2.2 The facility shall inform the CB immediately if there is a projected overproduction. *Complies – the company has a mechanism for advising the CB of production variations, which are monitored internally.*

D.3. Record keeping

D.3.1 The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these requirements. *Complies – Inspection of records at the Mill confirmed these were updated daily. For example: Daily report dated 16 January 2013,*

D.3.2 Retention times for all records and reports shall be at least five (5) years. *Complies – Records are archived and stored for 5 years as per SOP.*

D.3.3 The facility shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO, PKO and palm kernel meal on a three-monthly basis. *Complies – these are updated every three month and reported to Head Office. Record: Mass Balance Table report 2012.*

D.3.4 The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/SG or Segregation. The supply chain model used should be clearly indicated. *Complies – The company uses the prefix SG on the Product Code. For example: Delivery Order dated 17 January 2013 to Felda Johore Bulklers; it was indicated RSPO/IP on the commodity brand. **Observation 07:** inconsistency implementation of SOP No: RSPOSC/SOP/SG/2 regarding supply chain model stamping on the delivery order. For example: CSPO/IP was stamped instead of CSPO/SG as stated in the SOP.*

D.4. Sales and good out

D.4.1 The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information:

a) The name and address of the buyer;

b) The date on which the invoice was issued;

c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance)

d) The quantity of the products delivered;

e) Reference to related transport documentation.

Complies – all of these items (a-e) are included in the company's invoices to buyers. For example: Delivery Order of CSPO to Felda Johore Bulklers dated on 17 January 2013,

D.5. Processing

D.5.1 The facility shall assure and verify through clear procedures and record keeping that the RSPO certified palm oil is kept segregated from non certified material including during transport and storage and be able to demonstrate that it has taken all reasonable measures to ensure that contamination is avoided. The objective is for 100 % segregated material to be reached. The systems should guarantee the minimum standard of 95 % segregated physical material; up to 5 % contamination is allowed. *Complies – The company has owned mechanism on the processing facility in term of working*

instruction and procedure. Review and site visit confirms all mechanisms are available for each station in the mill, and most of the mill workers are aware.

D.5.2 The facility shall provide documented proof that the RSPO certified palm oil can be traced back to only certified segregated material. *Complies – Pamol Kluang Mill has owned several procedure which might be easily traced back, e.g. Daily report, monthly progress report. The content of these documents showed FFB receipt and processed, CPO and PK produced.*

D.5.3 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that: The crush operator conforms to these requirements for segregation; The crush is covered through a signed and enforceable agreement. *Not Applicable – The mill is not equipped with palm kernel crushing plant. The palm kernel sells to several palm kernel crushing plants through local sales. The example of kernel crushing plant is Hok Huat Oil Mill located in Pasir Gudang - Johor Bahru.*

D.6. Training

D.6.1 The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems. *Complies – The company maintains records of training. The training for RSPO supply chain for staff was conducted on 6 September 2012.*

D.7. Claims

D.7.1 The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims. *Complies – As of the Assessor's knowledge, the company has not made claims outside of the RSPO rules for Communications and claim.*

Appendix “B”

RSPO Certificate Details

IOI Corporation Berhad
 Level 8, Two IOI Square
 IOI Resort 62502 Putrajaya
 Malaysia
 Website: www.ioigroup.com

Certificate Number: **SPO 547027**

Applicable Standards: RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance; RSPO P&C MY-NIWG 2010; and RSPO Supply Chain requirements for CPO Mills; Nov 2011 Module D - Segregation.

Pamol Kluang Palm Oil Mill and Supply Base	
Location Address	Kluang Johor Malaysia PO Box 1 86007 Kluang
GPS Location	Longitude 103° 23' 24" Latitude 2° 6' 36"
CPO Tonnage Total	64,895 mt
PK Tonnage Total	15,441 mt
Own estates FFB Tonnage	280,760 mt
Non-company Suppliers FFB Tonnage	0 mt

IOI estates	Mature (ha)	Immature (ha)	Unplantable/ others	Total land lease	Annual FFB Production (mt)
1. Pamol Barat	1,913	281	83.67	2,277.67	45,100.00
2. Pamol Timur	1,297	875	129.35	2,301.35	33,020.00
3. Mamor	2,115	0	115	2,230.00	64,490.00
4. Unijaya	1,122	72	66.64	1,260.64	29,760.00
5. Swee Lam	1,345	107	102.6	1,554.60	37,730.00
6. Kahang	2,288	0	132	2,420.00	70,660.00
TOTAL	10,080	1,335	629.26	12,044.26	280,760.00

Appendix “C”

3rd Annual Surveillance Assessment Programme

Assessment Programme January 15th – 17th, 2013

Date	Time	Subjects	Aryo	Haris
Monday, January 14 th	13.55 – 16.35	Aryo is travelling from Jakarta to Changi airport of Singapore	√	-
	17.00 – 20.00	Meet and pick up by IOI at the Changi airport Team travelling to Pamol Kluang and over night in Kluang, Johor.	√	-
	14.00 – 17.00	Haris is travelling from KL to Kluang, overnight in Kluang, Johor.	-	√
Tuesday, January 15 th	08.00 – 08.30	Opening Meeting e.g.: <ul style="list-style-type: none"> • Introduction • Presentation by the company representative (Estate and mill activities, Supply Chain related to the FFB supplied to the mill, progress corrective action of previous findings and progress on time bound plan). • Presentation by Audit Team Leader and confirmation on the assessment scope • Finalize Audit schedule (including stakeholders consultation) • Other business 	√	√
	08.30 – 12.00	Document review at the Pamol Kluang Mill (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, Time bound plan verification etc)	√	-
	08.30 – 12.00	Meeting and Interview with mill workers, female workers, contractors, suppliers, workers union representative.	-	√
	12.00 – 13.30	Break/lunch/pray	√	√
	13.30 – 17.00	Pamol Kluang Mill – Review on the documents, Inspection, warehouse, workshop, mill wastes, working safety, Supply chain for CPO mill, etc	√	-
	13.30 – 17.00	Meeting and interview with local governments (e.g. DOSH, Labor Dept., Land Dept., DOE, etc	-	√
	Wednesday, January 16 th	08.00 – 12.00	Estate 1 (Pamol Timur Estate) – Inspections e.g. Office, worker housing, Clinic, Landfill, Chemical store and mixing, Fertiliser, field spraying & harvesting, etc	√
08.00 – 12.00		Estate 2 (Pamol Barat Estate) – Inspections e.g. Office, worker housing, Clinic, Landfill, Chemical store and mixing, Fertiliser, field spraying & harvesting, etc	-	√
12.00 – 13.30		Break/lunch/pray	√	√
13.30 – 17.00		Continuing visit to Estate 1 (Pamol Timur Estate) – Inspections e.g. Office, worker housing, Clinic, Landfill, Chemical store and mixing, Fertiliser, field spraying & harvesting, etc	√	-
13.00 – 17.00		Continuing visit to Estate 2 (Pamol Barat Estate) – Inspections e.g. Office, worker housing, Clinic, Landfill, Chemical store and mixing, Fertiliser, field spraying & harvesting, etc	-	√
Evening		Auditor meeting	√	√

Date	Time	Subjects	Aryo	Haris
Thursday, January 17 th	08.00 – 12.00	Audit feedback meeting, verify other outstanding issues	√	√
	12.00 – 13.30	Break/lunch/pray	√	√
	13.30 – 15.00	Closing meeting preparation (Reports, etc)	√	√
	15.00 – 16.00	Closing meeting	√	√
Friday, January 18 th	06.00 – 10.00	Aryo travelling from Kluang to Changi Airport of Singapore. Haris travelling from Kluang to KL	√	√
	12.25 – 13.15	Aryo is travelling from Changi Airport to Jakarta.	√	-

Appendix “D”

Corrective Action Plan of the ASA3 findings

Details of Non-Conformities and Corrective Action Plans for Pamol Kluang Region 3rd RSPO Surveillance Audit

Indicator	Classification of NCR	Details of Non-conformances	Root Cause of Non-conformances	Proposed Corrective Action Plans
2.2.3.1	Minor 01	It was not found any boundary marks alongside the government road reserve adjacent to the Pamol Timur estate area.	Requirement to install boundary marking adjacent to the government road was not identified as part of the estate's boundary marking plan.	Installation of boundary markers along the government road reserve to the Pamol Timur Estate will be included as part of the boundary markers installation and maintenance programme. Refer to boundary marking plan and maintenance programme.
3.1.2	Minor 02	No documented evidence showing yearly review of replanting programme has been conducted.	System of reviewing the replanting programme was not available in the current estate management practice.	A system for yearly reviewing on replanting programme has been proposed. Actual implementation of the system will be initiated after the system has been approved by higher management to ensure it's implementable.
4.4.4 & 4.4.7	Minor 03	It is found that rainfall data monitoring is not consider as a part of water management plan.	Importance of rainfall data was not identified as one of the important aspect in the current water management plan.	Rainfall data information from the oil mill and estates will be incorporated into the water management plan. Refer to plans with incorporation of rainfall information for updating of the water management plan.

Indicator	Classification of NCR	Details of Non-conformances	Root Cause of Non-conformances	Proposed Corrective Action Plans
5.3.2	Minor 04	<p>Based on field visit, it is found two effluent ponds was potentially over flow and go to nearby the water stream. Correction taken by the mill is to build the safety bund and maintain the effluent level is 1 feet below. However, the proper corrective action shall be taken to prevent repetition of potential over flow of effluent from happening.</p>	<p>Although standard operating procedure (StOP) to prevent POME ponds from overflowing was available, the StOP was only based on physical observation and no actual data recording for effective monitoring.</p>	<p>POME pond level markers were installed to monitor and maintain the ponds by having a minimum of 1 feet freeboard from the surface of the bund. In order to prevent repetition of similar issue, Daily POME ponds level recording to be implemented.</p>

Appendix “E”

List of Stakeholders Contacted

LIST OF STAKEHOLDERS CONTACTED

INTERNAL STAKEHOLDERS

<i>Pamol Kluang Mill</i> Mill manager and staffs 1 boiler operators 1 engine room operators 1 chemical store officer 1 chief of central workshop 1 Clinic/hospital assistants	<i>Pamol Timur Estate</i> Estate manager and staffs 2 field supervisor/mandor 2 harvester 1 buffalo carrier 2 manuring workers 6 males spraying operator 1 female estate administrator 1 chemical store officer 1 chief of central workshop	<i>Pamol Barat Estate</i> Estate manager and staffs 2 field supervisor/mandor 1 chief of central workshop 1 chemical store officer 1 Nursery mandor 1 buffalo carrier 1 harvester
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EXTERNAL STAKEHOLDERS

<i>GOVERNMENT DEPARTMENTS</i> <ul style="list-style-type: none">• Department of Environment• Kampong Gajah Police Station	<i>NGOs and others</i> Workers UNION leader (NUPW) AMESU representative EFB Contractor Neighboring Smallholders Indian Temple Head Foreign workers representative (1 Indonesian, 1 Bangladeshi, 1 Nepalese, 1 Myanmar)	<i>Local Communities</i> Kampung Pangkalan Tereh Head Kampong Gajah School Head Master Ladang Pamol School Head Master
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Appendix “F”

Progress of Time Bound Plan

Schedule for Sustainability Auditing in IOI Group Mills and FFB Supplying Estates

Jan'08	Feb'08	Mar'08	Apr'08	May'08	Jun'08	Jul'08	Aug'08	Sep'08	Oct'08	Nov'08	Dec'08
--	--	--	--	Pamol Sabah Oil Mill (Covering 6 Estates)	--	--	--	--	--	Sakilan Oil Mill (Covering 3 Estates)	--
Jan'09	Feb'09	Mar'09	Apr'09	May'09	Jun'09	Jul'09	Aug'09	Sep'09	Oct'09	Nov'09	Dec'09
--	--	Pamol Kluang Oil Mill (Covering 6 Estates)	--	--	--	--	Gomali Oil Mill (Covering 11 Estates)	Baturong Oil Mill (Covering 4 Estates)	--	--	--
Jan'10	Feb'10	Mar'10	Apr'10	May'10	Jun'10	Jul'10	Aug'10	Sep'10	Oct'10	Nov'10	Dec'10
--	--	--	Bukit Leelau Region RSPO Main Audit (Covering 1 Oil Mill & 6 Estates)	--	--	Mayvin Grouping Main Audit (Covering 1 Oil Mill & 5 Estates)	--	--	--	--	Pukin Region RSPO Main Audit (Covering 1 Oil Mill & 4 Estates)
Jan'11	Feb'11	Mar'11	Apr'11	May'11	Jun'11	Jul'11	Aug'11	Sep'11	Oct'11	Nov'11	Dec'11
Sakilan & Pamol Sabah Grouping RSPO Surveillance Audit	--	Pamol Kluang Region RSPO Surveillance Audit	Syarimo Grouping RSPO Main Audit (Covering 1 Oil Mill & 9 Estates)	--	--	Gomali Region RSPO Surveillance Audit & Ladang Sabah Grouping RSPO Main Audit	--	Baturong Grouping RSPO Surveillance Audit	Bukit Leelau Region RSPO Surveillance Audit & Leepang Grouping RSPO Main Audit	--	Grouping RSPO Surveillance Audit & Morisem Grouping Main Audit (Covering 1 Oil Mill & 9 Estates)

						(Covering 1 Oil Mill & 8 Estates)			(Covering 1 Oil Mill & 7 Estates)		
Jan'12	Feb'12	Mar'12	Apr'12	May'12	Jun'12	Jul'12	Aug'12	Sep'12	Oct'12	Nov'12	Dec'12
--	--	--	Ladang Sabah Region RSPO Main Audit (Covering 8 estates) <i>*Audit date is depending on uplifting on suspension</i>	--	--	Syarimo Region RSPO Main Audit (covering 9 estates) <i>*Audit date is depending on uplifting on suspension</i>	--	Leepang Region RSPO Main Audit (covering 7 estates) <i>*Audit date is depending on uplifting on suspension</i>	--	--	--
Jan'13	Feb'13	Mar'13	Apr'13	May'13	Jun'13	Jul'13	Aug'13	Sep'13	Oct'13	Nov'13	Dec'13
Morisem Region RSPO Main Audit (covering 9 estates) <i>*Audit date is depending on uplifting on suspension</i>	--	--	--	--	--	--	--	--	--	--	--
Jan'14	Feb'14	Mar'14	Apr'14	May'14	Jun'14	Jul'14	Aug'14	Sep'14	Oct'14	Nov'14	Dec'14
--	--	--	--	--	IOI-Pelita RSPO Main Audit (covering 2 estates)	--	--	--	--	--	--

					<i>*Audit date is depending on uplifting on suspension</i>						
Jan'15	Feb'15	Mar'15	Apr'15	May'15	Jun'15	Jul'15	Aug'15	Sep'15	Oct'15	Nov'15	Dec'15
--	--	--	--	--	--	--	--	--	--	--	--
Jan'16	Feb'16	Mar'16	Apr'16	May'16	Jun'16	Jul'16	Aug'16	Sep'16	Oct'16	Nov'16	Dec'16
--	--	--	--	--	--	--	--	--	--	--	PT SKS & PT BNS RSPO Main Audit <i>*Audit date is depending on uplifting on suspension</i>